

**REPRESENTATIONS TO WINCHESTER CITY COUNCIL'S
LOCAL PLAN 2020 TO 2040**

**PROPOSED SUBMISSION LOCAL PLAN (REGULATION
19) CONSULTATION**

ON BEHALF OF BARWOOD LAND

OCTOBER 2024

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1.0 INTRODUCTION

- 1.1 Grass Roots Planning are instructed on behalf of Barwood Land, to submit representations to Winchester City Council's (the council) Proposed Submission Version of the Local Plan (Regulation 19). Once adopted, the new Local Plan will supersede both the Local Plan Part 1 Joint Core Strategy (LPP1) adopted in March 2013 and the Local Plan Part 2 Development Management and Site Allocations (LPP2) adopted in April 2017.
- 1.2 In addition to commenting on strategic planning issues, the representations are focused on the proposed level of housing allocated to the Intermediate Rural Settlement of Otterbourne and more specifically the site that the Regulation 19 (Reg 19) Local Plan proposes be allocated for housing here. We have already raised numerous concerns regarding this site and its associated constraints and proposed capacity, which remain unanswered. These representations continue to promote the site Land off Cranbourne Drive (as will be covered in Section 4 of this report) for allocation. This alternative site is less constrained and will offer far greater benefits, as a more suitable allocation for the settlement; or indeed an additional allocation to deal with the increasing housing need facing the Local Planning Authority (LPA) in what is a sustainable, well-connected location.
- 1.3 We understand the housing requirement set through the Reg 19 Local Plan is based on the Government's latest published Standard Method (SM) calculations. Whilst we welcome the use of the SM as the basis for calculating the minimum housing requirement, given the changes to the National Planning Policy Framework (NPPF) proposed by the new government (consulted on between July 2024 to September 2024); alongside the proposed changes to how the SM is calculated, it is not considered a robust approach for the Council to now be fast-tracking the Local Plan to examination without fully considering the potential consequences of meeting this additional need. This will simply delay the delivery of sufficient houses in the area and lead to a backlog in delivery that will adversely affect the plan making process in years to come.
- 1.4 The proposed amendments to the NPPF are likely to be ratified by the end of 2024/ early 2025, at which point the Council would have to plan to accommodate the additional housing numbers. This will need to be addressed either through the allocation of additional sites in the emerging Local Plan, or if the Council continue to press forward and submit the current Reg 19 version of the Plan for examination, a number of policies (including those referring to the settlement boundaries) will become out of date immediately and the Plan will require an immediate review following adoption.

- 1.5 With the number of concerns raised under the Reg 18 consultation (regarding the spatial approach, sites allocated for housing and the evidence compiled to support the chosen approach) which remain unanswered; and noting the amount of time required to understand the issues arising from the Reg 19 consultation, there is considered insufficient time for the Council to even consider progressing to examination with a robust Plan prior to the NPPF being ratified.
- 1.6 As is clearly stated in para 1.1 of the Procedure Guide for Local Plan Examinations (Aug 2024) *“The LPA should rigorously assess the plan before it is published under Regulation 19 to ensure that, in their view, it is sound and meets all the necessary legal requirements”.... “This approach may raise uncomfortable questions but the purpose of preparing a plan is to address all the necessary matters as far as possible, and not to defer them to future updates or rely on the Inspector to deal with them, or to fix deficient plans at examination”.*
- 1.7 Reviewing the summary of consultation responses to the Reg 18 Local Plan, it looks like a range of concerns were not robustly addressed prior to progressing to the Reg 19 Local Plan, despite the significant amount of time the Council took in publishing the responses, circa 18 months following the consultation.
- 1.8 The Procedure Guide for Local Plan Examinations goes on to advise that the LPA should look to invest time to produce a focused and comprehensive statement of the main issues raised in the Reg 19 representations to support the examination - providing the Inspector with a response to the issues raised so that they understand from the outset any substantial concerns about the Plan’s soundness or legal compliance. Given the time it took for the Council to summarise and publish the consultation responses from the Reg 18 consultation it is highly unlikely they will be able to review, and compile a summary of the main issues raised through the Reg 19 Local Plan consultation prior to submission (or indeed whilst the examination is running) and it is therefore highly unlikely that the Council will be in a robust position to progress to examination prior to the changes to the NPPF and SM being ratified. Accordingly, we strongly recommend that the Council reassesses its position, by looking to at least meet the minimum requirement set by the updated SM, not doing so will undermine the soundness of the Local Plan. Put simply, there is a significant and acknowledged housing need (particularly affordable) across the district, which will not be met by the emerging plan as it stands.
- 1.8 In terms of how this document is structured we have sought to respond to the policies included in the Proposed Submission Local Plan where relevant, largely focused on those falling under the “Homes for All” category, but also consideration of the evidence base which is intended to justify those policies. The report then focuses specifically on policy OT01, the draft allocation for Otterbourne and provides a critical review of the site “Land east of Main

Road”. In Section 4, the report sets out further details of the site promoted through these representations - Land off Cranbourne Drive (referenced OT08 in the SHELAA) which offers a more suitable, less constrained option for allocation. The report ends in an overall conclusion of the representations.

- 1.9 We are fully aware that at this stage in the Local Plan process, it is important to highlight if concerns are raised as to whether the Local Plan meets the test of soundness set out in the NPPF which includes being **Positively Prepared** (providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and where appropriate meet the unmet need from neighbouring authorities); is **Justified** (takes into account reasonable alternatives, and is based on proportionate evidence); is **Effective** (deliverable over the plan period, and based on effective joint working over strategic matters); and **Consistent with National Policy** (enabling sustainable development in accordance with the policies in the NPPF).

- 1.10 Given concerns relating to progressing the Plan to examination without considering how to accommodate the significant increase in housing numbers for Winchester that result from the proposed NPPF/ SM update, and concerns regarding how the evidence behind specific allocations has been compiled; we do not believe the Reg 19 Local Plan has been positively prepared or is justified - accordingly it is unsound.

2.0 CONSULTATION QUESTION RESPONSES

- 2.1 The following section sets out Barwood Land’s response to the specific questions included in the Council’s online consultation portal. Through this response we will look to confirm whether we support or object to a specific policy; providing a reasoned justification behind any objection where relevant, including whether the policy is considered to meet the tests of soundness.

Homes for all

Strategic Policy H1: Housing Provision

- 2.2 In submitting these representations, Barwood Land objects to Policy H1 which relates to Housing Provision across the Winchester district. As will be set out in this response, the Policy is not considered to have been positively prepared (i.e. provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed housing needs), and the approach taken is also not considered to be justified based on the proportionate evidence available.
- 2.3 As part of the Reg 18 consultation, Barwood Land previously provided representations which concluded that the number of dwellings proposed through the Reg 18 Local Plan was too low, with a heavy reliance on a few large strategic sites, an insufficient buffer to meet the neighbouring authorities unmet need and no buffer included to make an allowance for the non-delivery of a proportion of existing permitted sites. Whilst the Housing Topic Paper (July 2024) has sought to summarise the concerns raised and provide a justification as to how the Council has considered these to progress to Reg 19 consultation, it is clear that these issues have not been fully addressed. Indeed, the total district housing requirement put forward in Policy H1 is not considered sufficient to meet the housing need based on the current SM, let alone that suggested in the impending SM update which will significantly increase the housing requirements for the district. Instead of looking to consider the potential implications associated with this dramatic increase, the Council is instead looking to fast-track the Local Plan to examination, and thus avoid the consideration of this matter now – that simply delays grappling with this significant issue which is the antithesis of what the plan making system should be doing, instead it should be positively prepared to meet this issue head on now.
- 2.4 This is clearly set out in the Council’s paper to the Cabinet regarding progressing the Reg 19 Local Plan to consultation (paper published 19th August 2024). The reasoning behind why the Council is trying to accelerate the plan (and consultation process) to submit this for examination before the new NPPF is ratified is summarised in the following statement:

“The Government is consulting on significant amendments to the National Planning Policy Framework (NPPF) and in particular on an emerging requirement for new housing which would result in the Council needing to plan for a substantial increase in dwellings over the period of the new Local Plan. The Government consultation indicates this would not apply where a new Local Plan has been submitted for examination before the publication of the amended NPPF plus one month. Given the advanced stage of work that the new Local Plan has reached, and the significant delay and cost if matters are not expedited at this juncture, Officers therefore have recommended that the new Local Plan be approved by Cabinet and the Council for publication and then submitted for examination as soon as practically possible. Accordingly, this matter has been brought forward for decision in accordance with the urgency process set out in the Council’s Constitution – Part 4.4 Access to Information Procedure Rules 17.1 and 17.2”. (para 3.7 of the Scrutiny Minutes 19/08/24)

- 2.5 The Local Plan is effectively being fast-tracked to consultation, under the provision that from 1 month post-publication of the new NPPF (currently set to be ratified by Dec 2024/ Jan 2025), all Plans which set out new housing requirements will need to follow the new NPPF unless **(a) the plan has been submitted for examination already**, or (b) it has reached Reg 19 consultation, but the housing requirement is 200 homes a year or less below the new local housing need figure. Otherwise, the new NPPF applies along with any changed housing targets as derived by the new SM.
- 2.6 For Winchester, it is clear that whilst it has reached the Reg 19 stage in the Local Plan process, the updated SM would result in an additional 423 annual requirement (increasing from 676 dwellings under the current SM to 1,099 dwellings under the revised SM), which is more than double the 200 a year threshold. Therefore, even if the council do manage to rush its plan through to examination and it is found sound, national policy would require that it be immediately revised because its housing requirement is over 200 dwellings pa below what the new SM requires.
- 2.7 Our objection to Policy H1 is therefore focused on the proposed housing requirement set out in the policy because it is so significantly below that required to meet the need set out in the updated SM. This will have significant consequences for the LPA and important decisions regarding the spatial implications of this should not be ignored; regardless of what stage in the Local Plan process the Council has reached to date. The Council should be looking to accommodate a significant increase in housing across the district, which will undoubtedly mean allocating increased growth to smaller settlements outside of Winchester City including sustainable Intermediate Rural Settlement’s such as Otterbourne.

- 2.8 Whilst it is not considered robust or justified to progress with a housing need figure so significantly below that emerging through the SM update, fast tracking the Local Plan to examination also raises significant risks in not robustly addressing the concerns raised through the Local Plan consultation process. The concerns will be further covered in sections 3 and 4 of this report regarding Barwood Land's response to Policy OT01 and the current allocation at Otterbourne; but can be seen to be more widely discussed in relation to sites across the district, as highlighted in the Policy response Grass Roots submitted to the Council on behalf of Barwood Land following the publication of the Reg 18 consultation summary document (see appendix 1).

Plan Period

- 2.9 As set out in the NPPF with regard to a Local Plan - plan period it is expected that '*strategic policies should look ahead over a **minimum 15 year period** from adoption*' (NPPF para 22) and should be reviewed every 5 years. As set out in para 2.2 of Winchester's Housing Topic Paper 2024, work on the new Local Plan started in 2018 which was 5 years on from the adoption of the Core Strategy. This also coincided with the updating of the NPPF and introduction of the SM for assessing local housing need. A 20-year plan period was expected, to give 15 years from plan adoption.
- 2.10 The Housing Topic Paper sets out in para 2.4 that a revised plan period of April 2020 to March 2040 is proposed for the Reg 19 Local Plan (amended from 2019 to 2039 under the Reg 18 Local Plan). If the Council do continue to submit the Plan for examination in time for it to be examined under the existing NPPF and is successful in quickly progressing through the examination to allow adoption of the Plan next year (all of which, as will be set out, is considered highly questionable), then the Plan will only just cover the bare minimum 15 years from adoption. Given this point, it is considered appropriate to further extend the plan period, to allow for any delays in the process, and to ensure the 15 years at least is covered. However, on this point it is also acknowledged, that given the circumstances regarding the updated SM this may be a moot point as the Council would be required to immediately review the Plan following adoption, if the Council does not meet the updated housing numbers.

Current Housing Requirement

- 2.11 As set out in table H2 of the Reg 19 Local Plan the total housing requirement is based on the current SM and equates to 13,565 over the plan period (2020-2040) combined with an "*Unmet Needs Allowance (for unmet need in neighbouring authorities)*" of 1,900 dwellings. This equates to a total housing target of 15,465 dwellings. Despite the additional 500 dwellings added to the buffer, this figure is actually a reduction to that previously progressed

under the Reg 18 Local Plan of 15,628, which was based on the SM at the time being 715 dwellings pa, as opposed to that currently published which is now 676 dwellings.

- 2.12 Within the updated Development Strategy and Site Selection document (July 2024) it is stated in para 3.1 that the “*starting point for considering the minimum level of housing development is the Government’s “Standard Method”. The expectation is that this will be followed unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals*”.
- 2.13 Within the Reg 19 Local Plan the Council has updated the figures to take account of the latest published SM (as of March 2024) but has disregarded the proposed changes to the SM and significant additional annual requirement to be met by the district, given the “*advanced stage of work that the new Local Plan has reached, and the significant delay and cost if matters are not expedited at this juncture*”. Whilst the statement set out in para 2.10 above is made in relation to justifying why the Council did not propose a bespoke methodology to define its housing requirement, the significant increase in the housing requirement that the emerging SM suggests is considered to more than justify progressing an alternative approach which would appropriately address affordability concerns and the Government’s growth agenda by increasingly the housing requirement to reflect the proposed updates to national policy.
- 2.14 The Council’s approach to rush through the Local Plan based on the current SM, raises serious questions in terms of the robustness of the Plan, its evidence base and how the Plan has reacted to responses raised in the consultation process, significant issues which will no doubt become apparent through the examination process if progressed. As the Council acknowledges this would result in the need to start a review of the Local Plan as soon as it is adopted, meaning the settlement boundaries could be considered out-of-date (particularly based on the significant shortfall) at the point of adoption.
- 2.15 Within the 2024 Housing Topic Paper the Council confirm in para 3.6 that “*following the July 2024 General Election, the Government has announced its intention to reintroduce housing targets. It is expected that this will be done by reversing some of the changes made to the NPPF in December 2023. This is likely to reinforce the conclusion that the Standard Method should be used and, indeed, it may become obligatory*”. The Council clearly understands the implications of the proposed updates to the NPPF/ SM but are essentially disregarding the changes in order to fast track the Plan under the existing housing need figure. On this basis alone this is clearly not a version of the Local Plan which has been positively prepared or justified by the evidence available at the point of submission.

Affordability

- 2.16 The proposed amendments to the NPPF and SM can be seen to be a direct a result of issues facing Councils such as Winchester, an area with significant affordability concerns. Reviewing Winchester’s Strategic Housing Market Assessment (SHMA) Update 2024, this states in para 2.6 that the median house price in the Winchester District in 2023 was £494,475, up from £410,000 at the year ending March 2019 (as referenced in the SHMA 2020) a 20% increase in 5 years. As acknowledged in the SHMA this is circa 25% above the South East equivalent and 52% above that for England as whole (at £290,000).
- 2.17 The graph included in figure 2.3 of the 2024 SHMA (figure 1 below) presents the workplace-based price to income ratio and highlights that as of 2023 this stood at 13.19 for Winchester (up from 12.25 in 2018).



Figure 1. Housing Affordability Ratios in Winchester District against comparator geographies (2018 to 2023)- Source Winchester SHMA 2024

- 2.18 Figure 2 below, was published in the SDL Property Auction Publication - October 2023 and highlights the price to income ratio, showing that Winchester comes in at number 4 of the least affordable cities in the UK to buy a property, and showing property prices in Winchester are on average 18 times people’s earnings.

No.	City	Avg. Yearly Salary	Avg. Property Value	Price-to-Income Ratio
1	City of Westminster	£44,720	£1,801,760	40.29
2	St Albans	£31,928	£672,379	21.01
3	City of London	£56,628	£1,089,757	19.24
4	Winchester	£34,892	£635,378	18.21
5	Wells	£31,720	£553,565	17.45

Figure 2. 12/10/2023 - SDL Property Auctions - The most and least affordable cities to buy property in the UK - <https://www.sdlauctions.co.uk/latest-news/the-most-and-least-affordable-regions-to-buy-property-in-the-uk/>

2.19 As set out in the 2024 SHMA's Summary and Conclusions (para 7.1 and 7.2), 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*” (para 7.1). Affordability is clearly a growing concern for the district which is not being addressed under the current spatial strategy and unlikely to be addressed under that put forward for consultation. Given the significant increase proposed under the revised SM and the increasing affordability concerns, it is considered extremely important that the Local Plan be focused on determining a housing requirement for Winchester that goes as close as possible to addressing the area's full housing need.

Unmet Need of Neighbouring Authorities

2.20 Regardless of whether the proposed changes to the SM had come about, it is still considered that the housing numbers proposed under the Reg 19 Local Plan would be too low. This is based on similar issues to those previously highlighted in response to the Reg 18 consultation, which have not been fully addressed and thus remain valid.

2.21 In terms of the unmet need of neighbouring authorities, whilst the buffer included in the housing requirement is now referred to as “*Unmet Needs Allowance (for unmet need in neighbouring authorities)*” as opposed to the Reg 18, which referred to this as “*Standard Method changes / unmet need in neighbouring authorities*”, it has been increased from 1,450 to 1,900. This increase is marginal and considered to be insufficient to meet the acknowledged unmet need of neighbouring authorities. This also, as set out in the title change, (and at a time when this would be most relevant), takes off any consideration of potential future SM changes, which are evidently going to have a significant impact not only on the level of need across the district, but also on the level of unmet need in adjacent authorities such as Portsmouth and Havant.

2.22 Considering the “*unmet need in neighbouring authorities*” alone, it is understood that based on the March 2024 SM, several authorities within the Partnership for South Hampshire (PfSH) had confirmed they are unable to meet their SM housing needs in full and would therefore be looking for other authorities in the PfSH to assist in dealing with their unmet need under the Duty to Cooperate (DtC).

2.20 Whilst under the Reg 18 Local Plan the PfSH was still working towards establishing the scale of any shortfall in provision, the PfSH published a Spatial Position Statement in December 2023 which identified an overall unmet housing need of some 11,000 dwellings. Whilst we acknowledge that the shortfall is at the lower end of that previously estimated (at between 11,000 to 13,000), this issue pales into insignificance when considering the impact of the SM update across the PfSH. Even taking into account the reduced housing need for Southampton,

considering the other PFSH authorities set out below have all seen significant increases in their housing need with the total annual requirement covering the Authorities of Southampton, Portsmouth, Eastleigh, East Hampshire, Fareham, Gosport, Havant, Test Valley and New Forrest increasing from 6,189 under the current method to 8,888 under the proposed SM.

ONS Code	Local Authority Area	Current Method	Proposed Method	Difference
E06000045	Southampton	1,473	1,295	-178
E06000044	Portsmouth	897	1,098	201
E07000086	Eastleigh	645	902	257
E07000085	East Hampshire	575	1,074	499
E07000087	Fareham	498	794	296
E07000088	Gosport	339	465	126
E07000090	Havant	508	874	366
E07000093	Test Valley	524	921	397
E07000091	New Forest	729	1,465	736
	Total	6,189	8,888	2,699

Table 1. PFSH – housing numbers based on the amended housing need figures

2.23 Whilst some Authorities may be able to meet the increased need within their local authority area, various authorities in particular Portsmouth and Havant, have already confirmed under the DtC that they cannot meet the existing SM figures and will be looking for other authorities to meet their acknowledged shortfall. The implications of the proposed SM update is likely to result in further councils taking this stance and as part of the DtC, Winchester should be a key contributor towards meeting this unmet need in neighbouring areas that are highly constrained in terms of available land.

Non-Delivery and Reliance on Strategic Sites

2.24 As set out in para 3.26 of the Housing Topic Paper 2024, the Council has not considered it necessary for the SM figure to be updated or a buffer added for market fluctuation, flexibility or non-delivery.

2.25 The Council also remains too reliant on several strategic sites including the three ‘strategic allocations’ at West of Waterlooville, North Whiteley and North of Winchester which account for over 5,000 dwellings. By not including a non-delivery buffer they also fail to take account changing circumstances in terms of the economy and other external factors. Indeed, the Council is still in the process of dealing with the impact of Natural England’s requirement for nutrient neutrality, which has, and will continue to impact housing delivery across the district;

and still impacts the viability and deliverability of certain sites. Indeed, just because sites have planning permission does not necessarily provide, as the Council suggests “*a high level of certainty over the delivery of this additional housing*” within the plan period.

- 2.26 Again, we maintain this is not a robust approach and as previously set out suggest a non-delivery buffer should be included to the overall total, the application of such a contingency buffer is commonplace in plan making and essential to allow the plan to react to changing circumstances.

Conclusion to Policy H1

- 2.27 In conclusion, the housing requirement currently being progressed through the Reg 19 Local Plan is significantly under that required to meet the acknowledged housing need.
- 2.28 In para 3.9 of the supporting housing topic paper 2024 it is stated that “*There is no merit in increasing the SM figure to try to pre-judge future changes, as the PPG allows it to be updated until the Plan is submitted. Therefore, the SM figure is more likely to fall in the period up to submission of the Plan, rather than increase, but there is scope to update it as necessary*”.
- 2.29 It is clearly the case that the SM update will actually result in a significantly increased housing requirement for Winchester, and it is considered necessary to update this now prior to submission of the Plan to examination. The Government has been clear that plans should not be progressed if prior to submission the difference between the existing standard method and that proposed is more than 200 dwellings, as acknowledged the difference in respect of Winchester’s Plan is more than double this, and we cannot therefore think of any justifiable, or indeed sound, reason as to why the Local Plan should be progressed without considering the pending increased requirements.
- 2.30 Policy H1 is therefore considered unsound as it has not been positively prepared or seek as a minimum to meet the area’s objectively assessed needs, and the approach taken is also not considered to be justified based on the proportionate evidence available. In terms of potential modifications to meet the increased need, this would require a significant uplift to the buffer; or an additional buffer to deal solely with potential increased need associated with future SM updates. Acknowledging, this would in turn have significant implications for other policies within the Plan.
- 2.31 This would require a significantly increased Total District Housing Requirement to accommodate the additional 423 annual requirement set by the proposed SM update, equating to circa 23,079 dwellings (when incl. 5% buffer); which is an additional 10,144

dwellings over the plan period; alongside a robust buffer, which takes account of the additional needs of neighbouring authorities (via the DtC) and accounts for non-delivery.

Strategic Policy H2 - Housing Phasing and Supply

- 2.32 Barwood Land object to policy H2. In summary, progressing the current phasing approach will inevitably lead to issues in the short-term housing supply and housing delivery not being located in the most appropriate locations. It is therefore considered that this policy is unsound as it has not been positively prepared and could in fact further restrict the LPA from meeting its housing need, particularly regarding affordable housing.
- 2.33 It is widely known that delivering brownfield sites often involves overcoming significant constraints, which can impact a site's deliverability/ viability, with higher remediation and demolition costs making such sites more expensive to develop. Brownfield sites are also typically smaller and more physically constrained than greenfield sites and this combined with the higher remediation costs often results in the need for a greater height and density to be delivered on site, essentially the delivery of flats, over family houses. The increased costs can also often lead to concerns over viability and in many cases affordable housing is the first thing to be reduced to make the scheme more viable, while also mitigating other impacts (i.e. highways, education etc. infrastructure which will still need to be delivered in preference to affordable housing). Given the affordable housing need across the Winchester district and noting brownfield sites are only required to deliver 30% affordable housing, under the proposed affordable housing policy - policy H6 (rather than 40% for greenfield) this further compounds this issue. It is not considered a suitable approach to restrain the greenfield allocations which are most likely to deliver the required affordable housing the area so desperately needs.
- 2.34 With a significant focus on Winchester town to meet the housing requirement (37% of the total target) and a focus on brownfield delivery above greenfield, it is likely to lead to the delivery of less family homes and less affordable dwellings in the short term, as well as having potential implications on the Council's ability to maintain a rolling 5-year housing supply.
- 2.35 Appendix 4 of the Local Plan Part 1 includes in figure 4.1 a chart showing net completions on previously developed land and greenfield land and shows the important contribution greenfield development makes in terms of housing delivery across the district (see figure 3 overleaf).

Appendix 4 – Local Plan Part 1

Figure 4.1 Net Completions on Previously Developed Land and Greenfield Land (2011/12 –

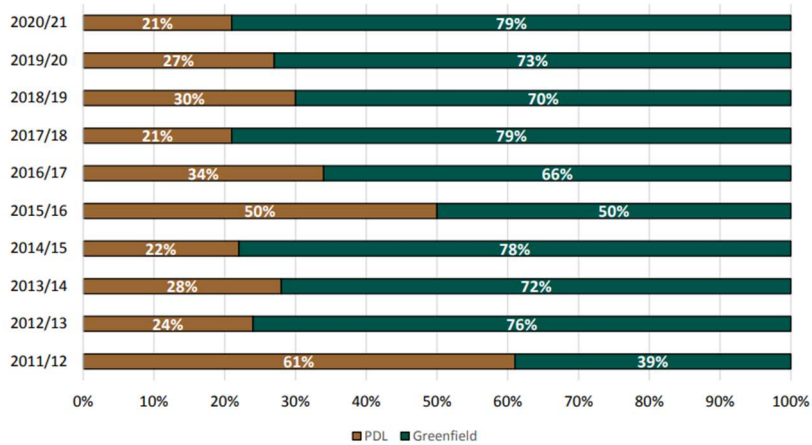


Figure 3. Winchester Authority Monitoring Report 2021

2.36 Figure 4 includes a chart taken from Winchester’s latest Authority Monitoring Report (AMR) 2022/23 and shows the continued importance in terms of the greenfield contribution, now accounting for 80% of the total net completions.

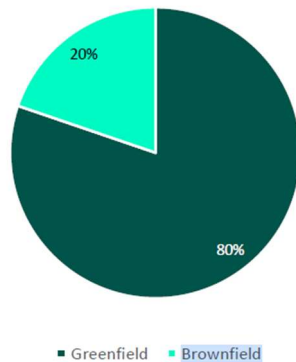


Figure 4. Chart taken from the 2022/23 Authority Monitoring Report

2.37 Greenfield land also has the potential to deliver on the government’s net zero aspirations and make considerable biodiversity net gains, again something brownfield sites are more constrained to deliver.

2.38 We acknowledge this policy has been updated, apparently to reflect comments arising from the Reg 18 Local Plan, however we cannot see how the inclusion of site-specific restrictions adds anything further in terms addressing the concerns raised.

2.39 Given the issues raised above it is not considered appropriate to continue to progress a policy which adds further restrictions to any form of housing considered suitable for allocation, acknowledging the significant unmet need across the district.

Strategic Policy H3 - Spatial Housing Distribution / Strategic Policy SP2

- 2.40 Barwood Land object to policy H3 and SP2 which both refer to the spatial strategy and distribution of housing. The Policies are not considered to be positively prepared, as they do not represent the most appropriate strategy to meet the area's objectively assessed needs. In summary the approach continues to be too focused on Winchester Town and South Hampshire Urban Areas, neglecting to fully consider the potential that smaller sustainably located towns and villages can offer.
- 2.41 As set out in Policy H3 the spatial housing distribution approach is currently split between Winchester Town (5,640 dwellings), South Hampshire Urban Areas (5,650 dwellings) and Market Towns and Rural Areas (3,825 dwellings). This approach relies too heavily on Winchester itself, and it is felt that housing should be distributed more evenly across the district, to support the facilities in smaller towns and villages and deliver affordable housing across the district.
- 2.42 There are no doubt various locations in Market Towns and Rural Areas which are suitable to deliver enhanced levels of growth. This is particularly apparent when considering sustainable locations such as Otterbourne, which could deliver significantly more dwellings than are currently allocated to the settlement.
- 2.43 Paragraph 9.28 of the Local Plan states that "*The smaller 'intermediate' rural settlements have modest housing provision, as they do not benefit from significant commitments or completions*". This is misguided as the chosen growth strategy should be focused on the sustainability and suitability of a place rather than previous commitments – i.e., continuing existing development trends rather than assessing the evidence in respect to the accessibility/sustainability of specific sites and settlements. Simply following past trends is not a rational way to plan and is as unsound as it is unjustified.
- 2.44 Page 18 of the Council's latest AMR 2022/23 includes a chart showing net dwelling completions across the district, and indicates the important contribution made by Market Towns and Rural Areas. This accounted for 28% of all completions in 2022/23, as opposed to Winchester City (where the majority of growth is directed) which makes up just 20%.

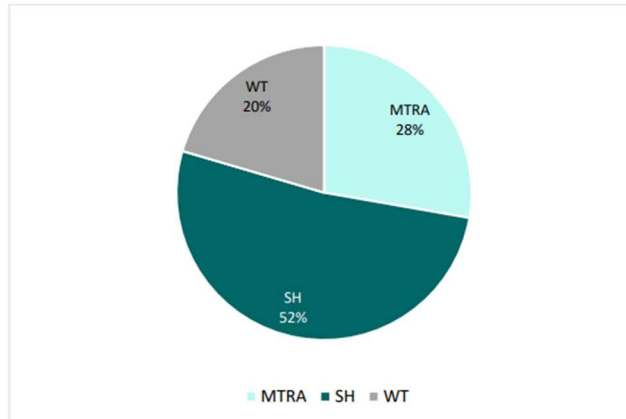


Figure 5. Winchester Authority Monitoring Report 2022 - 2023

- 2.21 As set out in paragraph 2.3 of the Local Plan Part 1; the Core Strategy was informed by a “settlement hierarchy” approach which ranked settlements, according to the availability and accessibility of a broad range of facilities, the settlement’s economic role and the environmental constraints to development. This resulted in the classifications of Winchester Town, South Hampshire Urban Areas and Market Towns and Rural Areas, which were progressed forward as part of the emerging Local Plan. The Council’s Settlement Hierarchy 2022 notes that Otterbourne functions as one of several villages with a high degree of accessibility.
- 2.22 As set out in paragraph 2.2 of the Settlement Hierarchy document “*Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby (now paragraph 83, NPPF)*”.
- 2.23 A points-based scoring system was used to rank the settlements, with points being scored for the presence and accessibility of services and facilities. Different facilities also attracted different scores, according to their assumed contribution to a self-sustaining community. For example, a supermarket would receive three points, but a convenience store would only attract two points. The full methodology for the Council’s evidence broadly follows the deprivation index criteria on accessibility to local services.
- 2.24 Whilst this is a sensible starting point, the approach omits accessibility to services and facilities within walking/cycling distance or via a short public transport journey. For example, an urban extension to Winchester, might be 5km from a facility on the other side of the settlement or 2.5km from the city centre whereas a Parish might omit facilities in adjacent parishes which in reality are within walking/cycling distance.

Polycentric Approach

- 2.25 As we previously set out in our response to the Reg 18 Local Plan, sustainability can be promoted amongst smaller settlements by treating these as parts of a 'polycentric' settlement. This approach takes into account the propensity for people to travel to their nearest facility, even if that lies beyond their defined village.
- 2.26 It is our view that the sustainability of Otterbourne should be considered as part of a polycentric network of adjoining villages. Given Otterbourne is close to other settlements it is accessible to a significant number of amenities and services within walking/cycling distance, which would be commensurate to that expected of a much larger settlement. The area could therefore accommodate a greater contribution to the overall housing requirement for Winchester.
- 2.27 These centres are visualised in Figure 7 below, with the size of the sphere representing the settlement score and relative draw of the location.

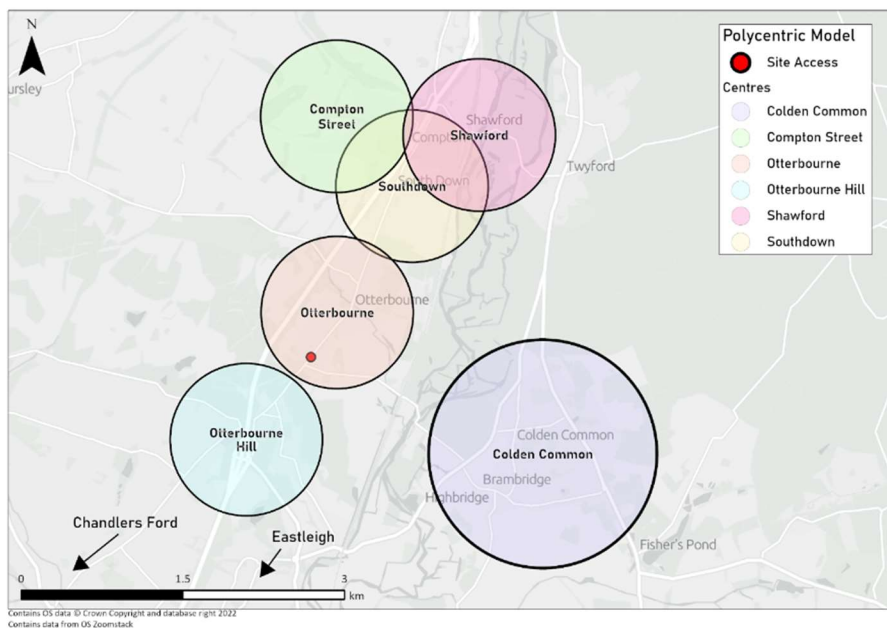


Figure 6. Polycentric Model – Otterbourne

- 2.27 Taking account of the wider accessibility of neighbouring villages, following the polycentric model, the score appointed to Otterbourne would have been significantly higher, with the ability to access a secondary school, GP surgery and railway station within cycling distance of large areas of the settlement.

- 2.28 In reviewing the assessments and scores awarded, it is clear this consideration did not factor into the progressed hierarchy. If it had of been in respect of Daily Facilities/ Services, Otterbourne could have scored a full 20. For example, Otterbourne was awarded a 0 under pre-school/ nursery, despite there being various pre-school/ nursery opportunities in the vicinity which residents obviously utilise, including Bright Horizons and Otterbourne Day Nursery and Preschool on Otterbourne Hill. Otterbourne was also given a score of 0 for access to a train station, when Shawford train station is within a short c. 2km cycling distance; and indeed, proposals to potentially improve this link could be delivered as part of a future application.
- 2.29 In reviewing further, Otterbourne was provided a score of just 2 points for “*Other facilities or services*”, which should have been higher given the availability of facilities within the surrounding villages.
- 2.30 In terms of employment availability which also impacts the potential sustainability of a settlement, the site is surrounded by several significant employment sites within a short commuting distance including the following:
- South Central Ambulance Service
 - IBM Hursley
 - Nuffield Hospital
 - Monks Brook Industrial Park
 - Boyatt Wood Industrial Estate
 - Marwell Zoo/Marwell House
- 2.31 Assessing settlements such as Otterbourne using Parish boundaries as ‘hard lines’ is inappropriate and does not reflect the reality of how people live and interact with their environs. Instead, we believe that given the availability of services in and around Otterbourne, it should be considered as part of a ‘polycentric’ settlement and one which could and should play a more significant role in terms of meeting the future housing needs of the district.
- 2.32 Understanding the sustainability of smaller settlements such as Otterbourne, can and should be key in allocating appropriate sites to meet the increased housing required under the SM update.

Reviewing the Windfall Allowance

- 2.33 In reviewing the windfall allowance this report has focused particular attention to the proposed windfall allowances allocated to those smaller settlements including Otterbourne.
- 2.34 The Assessment of Windfall Trends and Potential Report (2021) which remains the latest version of the document to support the Reg 19 Local Plan states that “*A potential windfall*

*supply for the MTRA3a settlements as a whole has been calculated as **45 dwellings (3 dwellings per annum over 15 years)**”.*

- 2.35 As set out in paragraph 5.25 of the Windfall Assessment report the settlements which fall within the category MTRA3(a) include: Compton Down, Hursley, Knowle, Littleton, Micheldever, Micheldever Station, Old Alresford, Otterbourne, South Wonston, Southdown, Southwick, Sparsholt and Sutton Scotney.
- 2.36 However, in reviewing the Local Plan housing sources for Hursley (pg. 481), Otterbourne (pg. 485), South Wonston (pg. 491) and Sutton Scotney (pg. 499) this shows that these settlements have each been given a windfall allowance of 20 dwellings. This highlights the windfall allowance for these settlements does not follow the evidence set out in the Windfall Assessment. The Council looks to be placing an over reliance on the delivery of windfall development in the smaller settlements when they should be ensuring the delivery of larger allocations in these settlements to provide greater certainty that the overall housing requirement will be met, rather than the hope that the windfall trend will continue on sites that are not specifically identified now in the plan.
- 2.37 The response provided in relation to the calculation of the Windfall allowance, as set out in the 2024 Housing Topic Paper, is that “*whilst some respondents question the accuracy of the windfall estimates that are attributed to the main settlements the Windfall Study does not attribute windfall estimates to most individual settlements, so the figures in these tables are broad estimates. However, they are based on the expected levels of windfall in the relevant spatial areas and the windfall estimates are not critical at the settlement level, as the settlement housing requirements are for ‘new sites to be allocated’. It is appropriate to make an allowance for windfall at the district level, but it is not critical whether the estimates prove to be exact for each settlement*”.
- 2.38 However, we do not feel the statement is a justified response to this concern. The Local Plan has apportioned a need for the various settlements, which is evidenced as being met through allocations, windfall development and existing commitments/ completions. If the windfall allowance for an area is too high, surely to meet that need a larger allocation would be required.
- 2.39 Assessing Otterbourne specifically, the Council has included a windfall allowance of 20 dwellings over the plan period to 2040. However as evidenced in the Assessment of Windfall Trends and Potential Report (2021), just 5 dwellings were delivered over the 11 year period between 2012 – 2023. Also acknowledging as of 2023, there were no outstanding commitments.

- 2.40 This again, highlights that a windfall allowance for Otterbourne of 20 dwellings is too high and will lead to under delivery. Based on the completions evidence it is considered more realistic to suggest a windfall allowance of around 9 dwellings for a settlement such as Otterbourne. The evidence base therefore suggests that the Council should look to allocate a site capable of delivering at least 64 dwellings in Otterbourne to ensure that housing need is met on suitable and sustainable sites within the village (acknowledging this is without further considerations regarding the implications of the SM update) .
- 2.41 In conclusion Barwood Land object to policy H3 which is considered unsound as it does not appropriately apportion growth to the most sustainable locations or consider how smaller settlements can (through a polycentric approach) actually provide access to a far broader range of services and facilities than simply assessing the sustainability of a location in terms of the settlement boundaries.
- 2.42 The evidence utilised to support the policy (including windfall figures for the individual smaller settlements such as Otterbourne), is not appropriately apportioned and suggests this alongside the proposed allocation will not meet the proposed need under the existing SM, let alone with a more detailed understanding of the implications of the proposed SM update.
- 2.43 The Policy is not considered to be positively prepared (i.e. deliver an appropriate strategy to meet the area's objectively assessed needs) and continues to be too focused on Winchester Town and South Hampshire Urban Areas, neglecting to fully consider the potential that smaller sustainably located towns and villages can offer.
- 2.44 It is suggested that the policy should be modified to allow for an increased focus on those smaller settlements and lesser reliance on Winchester Town.

3.0 OBJECTION TO POLICY OT01 - LAND EAST OF MAIN ROAD

- 3.1 The key focus of these representations is based on Barwood Land's objection to draft Policy OT01: Land east of Main Road; which is considered unsound, as it is not justified by robust evidence, or an appropriate assessment of alternative sites to support its allocation.
- 3.2 As we have previously highlighted to the Council in our representations to the Reg 18 Local Plan consultation, and furthermore in response to the Council's Reg 18 Summary of Consultation Responses document (see appendix 1) this site is considered inadequate to deliver the housing numbers required in Otterbourne and has a series of constraints which have yet to be appropriately addressed. This means that when viewed against an alternative option for the village – land off Cranbourne Drive, one that is less constrained and offers significantly greater benefits, questions are raised as to why this site has been included as the preferred allocation in the Reg 19 Local Plan.
- 3.3 It is considered that the progression of Policy OT1 as it stands is unsound, as the evidence before the Council highlights various constraints, which would greatly impact the potential capacity deliverable on this site, and indeed potentially its deliverability. The previous questions we raised about this site remain unanswered, which also leads to questions regarding the transparency of decision making and the appropriate assessment of alternatives in progressing the allocation of this site. Various consultation exercises undertaken separately by Barwood Land and the Parish Council confirm this is not the favoured allocation for Otterbourne, and yet it remains the Council's preferred allocation. In response to this policy, we also again highlight the serious concerns which surround rushing to fast-track the Local Plan to examination; these are not new concerns and should therefore be addressed, as with concerns raised on numerous other areas of the Plan, prior to the Local Plan examination.
- 3.4 In relation to the point set out in para 3.3, we refer specifically to the e-mail sent to the policy team on 31st July 2024 (appendix 2) and letter (see appendix 1) sent in response to the Council's e-mail sent 23rd August 2024. Within this letter we raised concerns regarding the robustness of Council's reporting regarding responses to the Reg 18 Local Plan consultation. This included the fact the representations submitted to Policy OT1 on behalf of Barwood Land were missing from the summary of comments to this Policy and as such, we cannot see how these concerns were properly considered by the Council or adequately reported to Members. We also requested that this was rectified ahead of the Cabinet Scrutiny meeting on 16th September (scrutiny meeting held to discuss fast tracking the Reg 19 Local Plan) which was not done. Indeed, the consultation on the Reg 19 Local Plan was progressed without updating

the inaccuracies or answering specific questions regarding the validity of the conclusions reached regarding site selection in this settlement.

- 3.5 Whilst an e-mail was received from the Policy Team in relation to the initial correspondence, this only provided a vague response, which lacked any detail and failed to answer any of the specific points we raised. This is despite acknowledging they had incorrectly missed Barwood Land's objections to Policy OT1 in the summary of responses, as our representations were recorded under the 'Omission Sites' section with our comments regarding site OT1 largely omitted. This is clearly incorrect as the representations state they are in direct objection to Policy OT1. This was never rectified, and we received no response to the letter sent prior to the Reg 19 consultation.
- 3.6 Without Barwood Land's objection to Policy OT1 added to the summary of responses, as far as we can see there is no documented trail of how feedback was taken account in the analysis process; and those scrutinising the documents would not have been aware of our concerns raised in respect of this policy (which differed from those raised by other objectors). Again, with the representations we submitted to Policy OT1 missing from the summary of comments, the concerns raised have not been responded to (or in our view properly considered by the Council) or adequately reported to Members. This is not a robust position to be progressing to the next stage of consultation.
- 3.7 As highlighted within correspondence with the Policy team (see appendix 1), the Consultation Summary outlines that there were 35 responses in support of Policy OT01, 7 neither supporting or objecting to the policy and 10 specifically objecting. However, the comments included in the body of the summary document itself include 9 objecting to the policy, 6 neither supporting or objecting and 6 in support of the policy. As we raised, (and as remains unanswered) whilst our concerns would still be relevant regardless of numbers in support/ objecting at this stage; we continue to query who are these 35 responders who are supporting the policy and noting the omission of our own objection to the policy have questioned whether these summaries are correct or are they misleading supporting evidence. For transparency, we have on more than one occasion requested a response to this query, but no response has been received. This only raises further questions regarding the progressed allocation, particularly considering separate consultations undertaken by Barwood Land and the Parish Council highlighted little community support for the chosen allocation.
- 3.8 The e-mail and letter included in Appendix 1 and 2 clearly highlight the specific questions raised to the Policy Team, which remain unanswered, and are considered key to the consideration of the most appropriate allocation for Otterbourne. Further detail on these points is set out in Barwood Land's assessments of Land east of Main Road (see para 3.43).

Planning history at Land east of Main Road

3.9 The promoters of Land east of Main Road have previously submitted two Outline Planning Applications on this site in both 2016 and 2019 both of which were refused:

- 16/02115/OUT: Outline planning permission for up to 90 residential dwellings (including up to 40% affordable housing), introduction of structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation and attenuation, vehicular access point from Main Road and associated ancillary works. All matters to be reserved with the exception of the main site access. Application Refused 25/11/2016. APP/L1765/W/16/3165768 Appeal withdrawn May 2017.
- 19/00233/OUT: Outline planning application for the erection of up to 90 dwellings with public open space, landscaping and sustainable drainage system (SuDS) and vehicular access point from Main Road (Application Refused 31/07/2019).

3.10 There were 266 objections to the 2019 application from residents, again highlighting the concerns felt surrounding the delivery of housing in this location.

3.11 There were also six reasons for refusal applied to the 2019 application, perhaps most significant in terms of other assessments was reason 2 which read as follows (our emphasis):

*2. The proposed development is contrary to Policy CP20 of the Local Plan Part 1, Policy DM14 of the Local Plan Part 2 and the National Planning Policy Framework in that it would extend development outside the built-up area of Otterbourne into an area of countryside which falls within the Cranbury Woodlands Landscape Character Area. **By introducing development on this site the proposals would be detrimental to the landscape character of this area and the rural setting of Otterbourne and would detract from the enjoyment of the countryside from the public realm and public rights of way.***

3.12 The response from the Council's Landscape Officer confirmed the following: *"Given that key issues for this character (LCA: Cranbury Woodlands Landscape Character Area) area include fragmentation of habitats and suburbanisation, the development is considered to have a negative impact on the landscape character and would seem at odds with the LCA's strategy to 'conserve the generally enclosed, varied views throughout the area' and 'Conserve the linear nucleated form of Otterbourne.'" "The development would be harmful to landscape character as it would completely change this area of countryside to an area of suburban housing. Despite the applicant's efforts to retain existing boundary vegetation, trees,*

woodland and hedgerows, the development by its very nature would have a significant negative effect on the countryside”.

- 3.13 The proposal was also refused on highways grounds under reasons 3 and 4 (below), and our own highway consultant has raised potential safety concerns resulting from the addition of a further arm off the Coles Mead roundabout required for access, which should be fully assessed.

3. The proposed development is contrary to Policy DM17 of the Local Plan Part 2 and the National Planning Policy Framework in that, in the opinion of the Highway Authority, the proposed access is inadequate to accommodate the development safely. This would result in an unacceptable impact on the safety of users of the development and adjoining highway.

4. The proposed development is contrary to Policy CP10 of the Local Plan Part 1 and the National Planning Policy Framework in that, in the opinion of the Highway Authority, the movements generated could not be accommodated adequately on the existing transport network. This would result in a severe impact on the road safety and operation of the local transport network.

- 3.14 The above references are specifically relevant when considering how the site was assessed through the IAA and the SHELAA.

Supporting Evidence Review

- 3.15 The section includes a more detailed review of the background evidence supporting the Local Plan including the 2021 and 2023 SHELAA, the Integrated Impact Assessment (IAA) 2024 and the Development Strategy and Site Selection 2024 (to support the above summary of concerns). We have also reviewed Otterbourne Parish Council’s assessment of the sites and responses received to their own consultation.

Strategic Housing and Employment Land Availability Assessment (SHELAA) 2021/ 2023

- 3.16 In responding to the Council’s Reg 18 consultation, we raised several inconsistencies between how sites were assessed through the 2021 SHELAA and these inconsistencies remain unaddressed in the 2023 SHELAA. Indeed, in relation to OT01 (OT03 in the SHELAA) and Omission Site Land off Cranbourne Drive (OT08 in the SHELAA) the same assessment summaries have been carried forward, which raises questions as to whether the consultation responses were fully reviewed and taken into consideration. As set out above we have had no feedback from the Council on these points.

- 3.17 According to the SHLEAA methodology, the following factors were considered to assess each site's suitability for development (which remains unchanged between 2021 to 2023):
- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination.
 - potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.
 - appropriateness and likely market attractiveness for the type of development proposed.
 - contribution to regeneration priority areas.
 - environmental/amenity impacts experienced by would be occupiers and neighbouring areas.
- 3.18 In assessing site suitability, the Council adopted the RAG system "Red/ Amber/ Green" as part of the high-level initial assessment. Whilst this is a well adopted practice in SHELAA methodologies, in reviewing the results it is at times unclear how the assessment resulted in the concluded colour score, partly as the approach lacks transparency, but also there appears to be issues of inconsistency across the assessment, particularly apparent when reviewing constraints such as landscape, archaeology and heritage.
- 3.19 For instance, in considering the results of the initial landscape appraisal it is unclear how a site such as Land off Cranbourne Drive, which is both physically and visually contained could be recorded as "amber" under the SHELAA appraisal and a site such as Land east of Main Road (the current allocation) where there has already been two planning applications refused on landscape grounds could be recorded "green". Land east of Main Road, would arguably have significantly higher impact in landscape terms than Land off Cranbourne Drive, particularly given the potential impact on views (adverse effects on receptors of higher sensitivity) available from people walking the public right of way crossing through the site and as evidenced in previous applications on this site which have been refused for reasons including landscape impact. This should have been flagged at this point as a potential significant constraint. In comparison, Land off Cranbourne Drive is considered to have limited potential impact on landscape given its contained nature and therefore should have been awarded "green".
- 3.20 As noted above we highlighted this point through the Reg 18 consultation but have received no further response in terms of why this approach was progressed or considered robust.
- 3.21 In terms of a potential heritage impact, Land east of Main Road is currently recorded as "green" despite the number of listed buildings in proximity, including Otterbourne House directly adjacent the site. A solely GIS desk-based assessment is not suitable to consider this

constraint when the impact of the setting of listed buildings is so important. At the least, Land east of Main Road should have been recorded as “amber” in the SHELAA.

3.22 Again, when considering Archaeology, Land east of Main Road has been recorded as “green”, despite the fact the line of a Roman Road directly bisects the site. Whilst our own assessments would suggest this unlikely to result in the undeliverability of the site, it would appear unjustifiable at this point to consider there to be no potential archaeology constraints. This should be recorded as “amber” in the SHELAA.

3.23 In solely reviewing the two sites OT03 and OT08 we have previously raised (and continue to raise) notable concerns on the validity of this assessment process and the robustness of the supporting SHELAA which has underpinned the initial assessment of sites and does not appear to have been reviewed despite the concerns raised.

Integrated Impact Assessment (IIA) 2024

3.24 We understand the Council’s IIA has taken forward those sites considered deliverable/developable and undertaken a more detailed appraisal, this was done through the IAA 2022, and then again reviewed in 2024 to support the Reg 19 Local Plan. When considering OT03 Land east of Main Road, against OT08 Land off Cranbourne Drive the inconsistencies noted from the SHELAA are again apparent, particularly in considering heritage and landscape impact.

IIA Objective	Score
IIA1: climate change mitigation	Minor negative (-)
IIA2: travel and air quality	Minor negative (-)
IIA4: health and wellbeing	Minor positive (+)
IIA7: services and facilities	Minor negative (-)
IIA8: economy	Negligible uncertain (0?)
IIA9: biodiversity and geodiversity	Significant negative (--)
IIA10: landscape	Negligible uncertain (0?)
IIA11: historic environment	Negligible uncertain (0?)
IIA12: natural resources	Significant negative (--)
IIA13: water resources	Significant negative (--)
IIA14: flood risk	Negligible (0)

Figure 7. Integrated Assessment: OT03: Land east of Main Road

3.25 Given the constraints at Land east of Main Road, particularly regarding potential landscape and heritage impacts it is again unclear how the site received certain rankings. For both Landscape (IIA10) and Historic Environment (IIA11) Land off Main Road received a negligible uncertain (0?) ranking. It would just take a high-level desktop assessment to show that this is

inaccurate and that the site should have been recorded as at least amber “minor negative (-)” for both.

3.26 When considering the justification behind the green ranking in relation to heritage, this refers to the SHELAA record with the justification simply being that it was rated green for effects on heritage assets in the SHELAA. This does not appear to be a particularly strong justification, or particularly clear evidence to suitably test alternatives.

IIA Objective	Score
IIA1: climate change mitigation	Minor negative (-)
IIA2: travel and air quality	Minor negative (-)
IIA4: health and wellbeing	Minor negative (-)
IIA7: services and facilities	Minor negative (-)
IIA8: economy	Negligible uncertain (0?)
IIA9: biodiversity and geodiversity	Significant negative (--)
IIA10: landscape	Minor negative uncertain (-?)
IIA11: historic environment	Negligible uncertain (0?)
IIA12: natural resources	Significant negative (--)
IIA13: water resources	Significant negative (--)
IIA14: flood risk	Negligible (0)

Figure 8. Integrated Assessment - OT08: Cranbourne Drive

3.18 In comparison, Land off Cranbourne Drive is recorded as minor negative uncertain (-?) for landscape (a ranking not included in the methodology as looks to combine minor negative with uncertain?). It is unclear how this can be justified given the site’s contained nature, both physically and visually. This is made more unclear and less robust given the ranking attached to Land east of Main Road which our own assessment suggests (alongside the Council’s previous reasons for refusal) could have the potential to significantly impact the landscape character and rural setting of the village.

3.19 This point has been reiterated by our own supporting landscape consultants Tyler Grange who, on conducting a Comparative Landscape and Visual Analysis of those SHELAA sites in Otterbourne, could find no reasons why sites OT03 and OT04 were assessed as being preferable to OT08 in landscape terms.

3.20 Indeed, the Council’s later Development Strategy and Site Selection 2022 report (updated in 2024), which includes initial technical appraisals in Appendix 3 (technical assessments were only done on chosen options), this highlights the site could have a high impact on visual sensitivity and a medium impact on both landscape character sensitivity and value. It is considered that this level of assessment would have been useful as part of the IAA in order to consider alternatives more robustly.

For this site the Overall Landscape Sensitivity to a housing development is assessed as follows

	Very high	High	Medium	Low	Very Low
Landscape character sensitivity			3		
Visual sensitivity		4			
Value			3		
Overall sensitivity	= 10 medium				

- 3.21 In terms of IIA Objective 1, whilst not previously raised we note in response to the Reg 19 consultation and 2024 IAA, the assessment incorrectly records Land off Main Road as being with 400 metres of a primary school, this is not the case, the distance is clearly over 500 metres and requires crossing the Main Road, adding further potential safety and/or traffic implications and making the walking route to school less attractive.
- 3.22 Regarding IIA objective 1, Land off Cranbourne Drive is also considered to be minor negative, despite the fact it is both within 400 metres of a primary school and within 501-1000m of a secondary school which should be considered of significant benefits in terms of sustainability. The site would also not result in any loss of public open space. Given these points it is considered that with regard to IIA1 this should for Land off Cranbourne Drive be at worst Negligible (0).
- 3.23 Finally, in considering health and wellbeing the assessment records OT03 Land off Main Road as being of minor benefit; although in reviewing the criteria behind this score it is unclear what this minor benefit relates and how the weighting has been attributed is unclear. There is also no recognition within the IIA that Land off Main Road would actually result in a loss of well used publicly accessible land, which is considered to be of detriment to the public health and wellbeing.
- 3.24 Indeed, for OT08 Land off Cranbourne Drive whilst it is acknowledged that this site is near the M3 motorway and the noise constraints associated with this require consideration, it is unclear how the site has been assessed in terms of potential noise constraints (which is likely the main reason for the negative score regarding IAA4). The site benefits from a substantial landscape buffer between the site and the motorway which can and would be retained and enhanced through any future development proposal at this site, which, alongside other mitigation measures will significantly reduce this potential constraint to acceptable levels. Initial noise modelling taken on this site, shows the site can be delivered to achieve adequate external noise levels; with further opportunities to include noise reduction features such as an acoustic fence along parts of the western boundary if required. The orientation of the

buildings can also be designed as such to reduce potential noise impacts on more sensitive parts of the development including protecting the residential amenity of resident's outdoor spaces. In addition, the orientation of the proposed uses on site could also act as a further noise buffer to existing residents along Cranbourne Drive and in this regard the proposed scheme could actually offer a minor benefit in terms of noise mitigation.

- 3.25 Since the site was promoted through the SHLEAA and Reg 18 consultation; Land off Cranbourne Drive is also now proposing to secure land on site for either a community building or health facility (in response to the community consultation) which would have been considered a further benefit as it could potentially assist to reduce health inequalities in the district.
- 3.26 With these amended results Land off Cranbourne Drive, would clearly be shown to be the lesser constrained site and therefore more suitable for housing allocation.

Parish Council Assessments

- 3.27 According to the Development Strategy and Site Selection Reports, discussions were held with Town and Parish Councils across the district regarding the emerging development strategy and potential SHELAA sites to meet the level of development identified.
- 3.28 Whilst we understand initial discussions were held with Parish Councils including Otterbourne, as was raised in response to the Reg 18 consultation, it is felt that they should have been more appropriately supported, particularly in terms of the site assessment process and the final decision over which site to allocate.
- 3.29 Page 76 to 79 of the 2024 Development Strategy includes the justification for putting Land east of Main Road forward for allocation, which is based on the response from Otterbourne Parish Council. This remains the same response as put forward in the 2022 Development Strategy, despite the queries raised in this regard through the Reg 18 consultation.
- 3.30 In putting forward Land off Main Road, it is clear in its response that the Parish Council were still open to other options for development in the village at that point. The report highlights that the Parish Council had had three meetings with landowners of those SHELAA sites in Otterbourne and a fourth was arranged. This is within the same response as the allocation put forward; and suggests the appropriate assessment of the alternative sites had yet to be made before the decision was issued. It is our concern that the allocation put forward was rushed through in order to meet the Winchester Council's deadline, rather than with confidence that this was the most appropriate choice for the village – with the Parish response specifically stating (our emphasis):

“We are also in discussions with Barwood Land, representing the landowner of OT08 Land west of Cranbourne Drive (see letter attached). Both of these sites could offer

*potential for part-site consideration, and **we are not closed to these options**, particularly in relation to the requirement for securing the s106 agreement for development of the OT03 part-site. Both options are sustainable in terms of proximity to village amenities, the major concerns being vehicular access and traffic generation in an area of the village with residential density and walking routes to the primary school, but they too could offer potential community open space benefit if that should be the way forward. To conclude, with the information in hand and in principle agreements, the above is the best way forward we have currently agreed at the Parish Council meeting 17 May for future development of our village. Our next Parish Council meeting is 19 July, and we would appreciate further consultation with WCC in regard to the above prior to this meeting”.*

- 3.31 We are aware through meeting with the Parish Council, that no further consultation took place, which again suggests that site OT03 was progressed without an appropriate consideration of the alternatives.
- 3.32 As shared through the Reg 18 consultation response, figure 8 below sets out extracts taken from Annex A of Otterbourne Parish Council’s meeting minutes of 8 March 2022 and includes reference to both OT03 Land east of Main Road and OT08 Land off Cranbourne Drive. In reviewing this table, as we have previously highlighted, it becomes unclear how or at what point it was decided to progress with site OT03 (Land off Main Road) as the proposed allocation, given this was not the favoured option as shown in the scores of both the village residents and indeed the Parish Council. The minutes including annex A and B have also again been submitted alongside these representations (appendix 3).
- 3.33 In reviewing those scores, it should be noted that these include all 8 sites within Otterbourne which were originally put forward in the SHELAA, some of which were later discounted as whilst they were favoured by residents (given their distance from the centre of the village and therefore considered impact), they were agreed to be unsustainable locations, given their distance from the settlement boundary.
- 3.34 As can be seen from the table, Land off Cranbourne Drive (OT08) was scored 5th by residents of the village and 2nd by the Parish Council. Land east of Main Road (OT03) was scored 7th by residents and 5th by the Parish Council, again highlighting of the two sites, Land of Cranbourne Drive should have been progressed as the preferred option.
- 3.35 In reviewing the table set out in Figure 8, the following points stand out:
- The statements that OT08 is considered to have a high number of constraints and Land east of Main Road a low number. It is unclear what these constraints are, as our own

review (particularly considering highways, heritage and landscape impact), would suggest OT03 is significantly more constrained).

- Responses to both sites mention potential traffic impact on Main Road, but this was not mentioned as a perceived issue from residents when progressing with OT03.
- It is unclear where the assumption with regard to the delivery of flats emerged at OT08; and how this site would be any different in terms of what mix was progressed. Indeed, given the suggested density achievable at OT03 (as part of the OT01 allocation) it is more likely that OT03 would see the delivery of more flatted units.
- Again, looking at the potential benefit of OT03, it records the potential delivery of a mixture of housing types and affordable/ market value homes. Again, it is unclear how this site is considered different. OT08 will also deliver a range of housing types and tenures and would have the ability to deliver increased levels of affordable housing. Indeed, the other benefits listed under OT03 in relation to the potential amenity area and the ability to deliver all the housing on one site should have also been listed under the benefits of OT08.

<p>Land to West of Cranbourne Drive</p> <p>(OT08)</p> <p>6 x Constraints</p> <p>Village scored 5th</p> <p>OPC scored 2nd</p>	<p>99</p>	<p>Extension of existing development.</p> <p>Reasonable access via 'kickabout'</p> <p>Increase in school age children likely.</p> <p>Within village community and beneficial to local facilities.</p> <p>Potential affordable/market value housing.</p> <p>Minimal road infrastructure update required.</p> <p>Potential for part development of the site.</p> <p>Potential to create linking footpath to Sponder's Mede and village hall.</p> <p>Land not currently accessible for public use.</p>	<p>High number of Constraints.</p> <p>Potential traffic issues getting out on to Main Road, esp at school times.</p> <p>Houses very close to M3 with impact of noise and air pollution on physical and mental health.</p> <p>Most likely to be flats and not necessarily with children.</p> <p>Concentration of properties in one area with impact on existing residents.</p> <p>Existing services infrastructure (drainage etc) impacted for village.</p> <p>Flood zone.</p> <p>Larger site than needed to meet housing target, but part site could easily be possible.</p>
<p>Land to East of Main Road</p> <p>(OT03)</p> <p>3 x Constraints</p> <p>Village scored 7th</p> <p>OPC scored 3rd</p>	<p>106</p>	<p>Low number of constraints.</p> <p>Balances out the village ribbon development.</p> <p>Viable access (spur from roundabout) from Main Road.</p> <p>Well screened, limited impact on existing residents.</p> <p>Potential mix of home types and affordable/market value homes.</p> <p>Retention of Public RoW (potential reroute).</p> <p>Potential for additional amenities eg. Play area.</p> <p>Ease of access to existing village amenities.</p> <p>Long term increase in children of school age.</p> <p>All of village housing requirements met from a single site.</p> <p>Part site could be potential for 1/3 numbers.</p>	<p>Greenfield site, used by residents to access countryside.</p> <p>Potential traffic issues with access from/to Main Road.</p> <p>Site drainage.</p> <p>Natural walkway for community.</p> <p>Impact on existing local services and infrastructure.</p> <p>Quite a large site at almost double housing target figure.</p> <p>Roman road bisecting site.</p>

Figure 9. Annex A Planning Minutes 08/03/2022

3.32 The following extract (Figure 10) is also taken from Annex B of the Parish Council Planning Minutes of 8 March 2022 and confirms that of the 145 responses received (23% response rate) only 23 respondents were “For” site OT03 Land east of Main Road, and a significant 112

respondents were against; suggesting 77% of those responding were against the allocation of site OT03.

- 3.33 In comparison 53 respondents were “For” site OT08 Land off Cranbourne Drive and 79 against, indicating OT08 would be the more preferred option, with just over a third of those responding “For” the site. The results of the parish survey do not appear to reflect what has been put forward as most preferred by the residents or indeed at that point the Parish Council.
- 3.34 In light of these results and no further evidence to suggest any showstoppers or significant constraints on OT08, and the fact this site is being promoted with Chamberlayne Estates, a landowner that has prioritised quality and legacy; it should have been recommended as a preferred option.

IMPLICATIONS FOR FUTURE PLANNING WITHIN OTTERBOURNE

RESPONSES RECEIVED FROM THE VILLAGE

The Parish Council delivered 621 newsletters with forms. 145 responses were received = 23% response rate overall.

Not all respondents scored a FOR or AGAINST for every site and some respondents just submitted comments.

SITE	'FOR'	'AGAINST'	Site name with potential number of dwellings in brackets
OT01	87	44	Land at 'Meadowside' and 'Dean Croft' on Poles Lane (36)
OT06	72	53	Land at 'Roselea' on Highbridge Road (41)
OT05	72	62	Land off Waterworks Road (24)
OT02	59	65	Highbridge Farm on Highbridge Rd (181)
OT08	53	79	Land west of Cranbourne Drive (99)
OT04	48	85	'Park Farm' on Kiln Lane (68)
OT03	23	112	Land east of Main Road (106)
OT09	14	119	Land off Kiln Lane (185)

Figure 10. Annex B Planning Minutes 08/03/2022

- 3.35 The change in approach in terms of the site progressed for allocation, may have been based on considering this as a 'part site', and the supposed gifting of land to the Parish Council; however, if this is the case, the same consideration should have been given to Land off Cranbourne Drive in terms of what that site could also offer. As to be discussed in section 4, Land off Cranbourne Drive has the ability to deliver 6.9 hectares of open space and to gift 5.26 hectares of woodland to the Parish Council. Significantly above and beyond the 2.8 hectares proposed to be offered to the Parish Council at Land east of Main Road. The site also now offers land for the delivery of either a community building or health facility.

- 3.36 Not allocating OT03 Land east of Main Road would mean the area of open space around the public right of way could be retained as such and continued to be enjoyed by residents of Otterbourne. Land off Cranbourne Drive is not currently publicly accessible and therefore any increase in publicly accessible open space in this location could be of significant benefit to the local community.
- 3.37 As highlighted to the Policy Team (see appendix 4) between the 9th May and 10th June 2024 Barwood Land also undertook a community consultation - <https://www.landoffcranbournedrive.uk/> in order to further understand local views in relation to the allocation being progressed and whether an alternative site such as Land off Cranbourne Drive would indeed be preferred. As part of the consultation, letters were sent to 684 homes and businesses in the parish of Otterbourne, as well as to the Parish Council.
- 3.38 The consultation ran for just over 4 weeks and over that period the website was visited 1,412 times. In total we had 41 responses to the consultation and as opposed to seeing any consistent support for the draft local plan allocation, of those who responded 51% confirmed they had concerns regarding the proposed allocation at Land off Main Road, with just 22% appearing to support the allocation and the remainder either neutral or focussing their response specifically on Cranbourne Drive.
- 3.39 The main concerns and comments raised to the draft allocation were:
- Area is publicly accessible land regularly used by hikers / dog walkers / runners. The site was vital during Covid.
 - Area seems very small to accommodate so much housing / cramped / concern regarding density.
 - The proposal has been rejected twice already. The reasons for refusal still stand.
 - Land east of Main Road was “the least preferred” of all options in the village survey.
 - The development offers minimal benefit to the village and only provides housing and no additional amenities.
 - The site is next to a walkable area of local nature and beauty.
 - Concern that housing development will extend beyond what is currently stated in the Local Plan.
 - Concern over another direct access onto Main Road.
 - General concerns raised regarding impact on services, school capacity, drainage capacity and increased levels of traffic and congestion in the village which will be true for any new development of this scale.
- 3.40 In contrast 44% of those responding to the consultation supported development proposals at Land off Cranbourne Drive, with just 29% objecting and 27% leaving a neutral response and / or voicing concerns with the allocation of any development in Otterbourne. As is well

understood, it is often those who oppose development that are more likely to respond to a consultation such as this, so it is very positive to see this level of support.

- 3.41 Whilst this information was shared with both the Parish Council and Winchester City Council Policy Team (see appendix 4), we were simply directed to responding to the upcoming Reg 19 consultation. As this information was not considered prior to progressing the Reg 19 Local Plan, and current allocation for Otterbourne, we hope the evidence is considered appropriately at this stage.
- 3.42 We also acknowledge that given the significant additional need for housing as set out in the updated SM; and the fact sustainable locations such as Otterbourne look to be able to accommodate additional growth over that currently proposed, this site would be more suitable to meet the current need and/ or need as an additional site if required. Of particular relevance as it is considered that the capacity for Land off Main Road is inaccurate when considering the existing constraints.

Barwood assessments of Land east of Main Road

- 3.43 In undertaking our own review of proposed allocation site OT01 Land east of Main Road we have raised significant concerns regarding the deliverability of the 55 dwellings within the land allocated for development, understanding that the majority of the site will be required to be retained as open space.
- 3.44 The area of land contained within the surrounding trees, which sits opposite the Old Forge Public house is just 1.69 hectares in size. When considering the constraints, which include an area of woodland and trees surrounding the site covered by a tree protection order (TPO), alongside the infrastructure required to deliver the site (including attenuation ponds, roads, play area etc); we consider the end result is an area suitable to deliver no more than around 30 dwellings.
- 3.45 As demonstrated in Figure 10 below, Gladman's own planning application in 2019 considered the actual developable area of this parcel to be nearer 1.1 hectares which if it were considered suitable for 55 dwellings would lead to a very dense development of circa 50 dwellings per hectare. This would be more akin to a city centre scheme than a development located on the rural fringe of a village. As we have raised previously, we still contend that it is important that those internal council officers who previously considered the design as appropriate based on the delivery of the wider site, are reconsulted to consider whether they believe that 55 dwellings can be successfully accommodated within the land available.

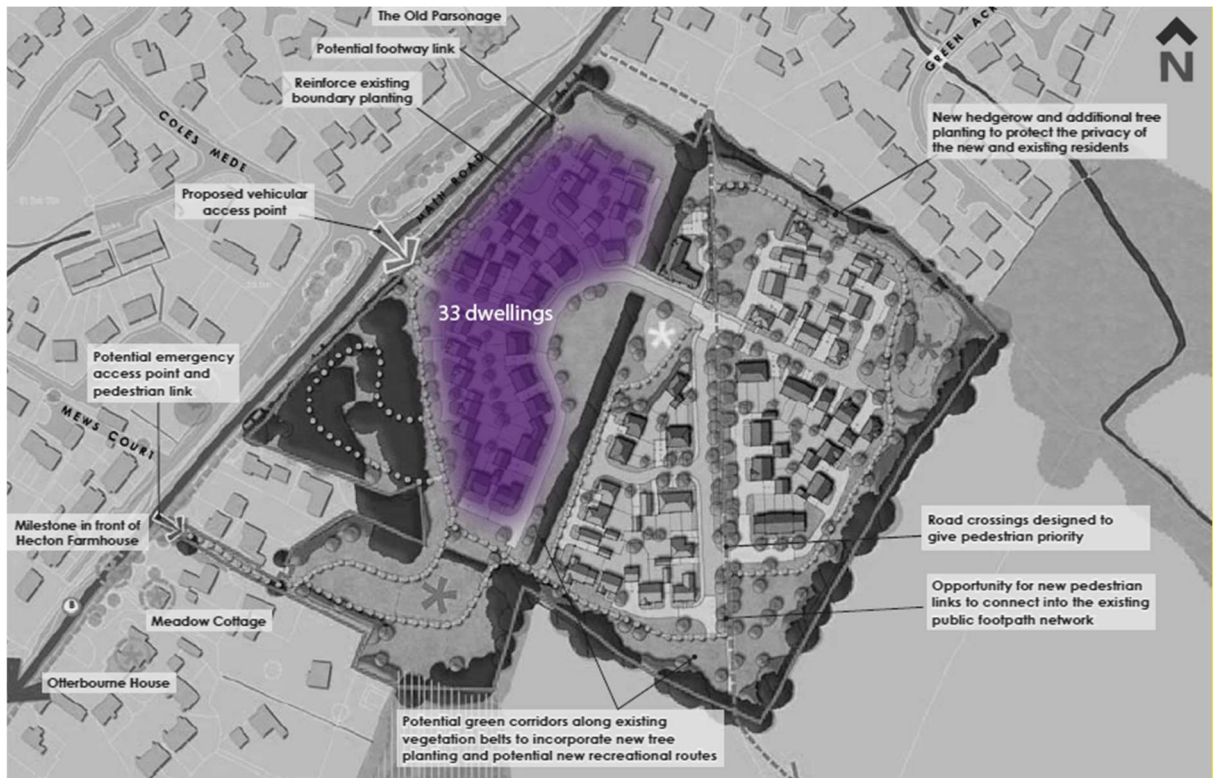


Figure 11. Gladman Masterplan from 2019 application, including shading and numbers inserted over.

- 3.40 The supporting text to Policy OT01 states “*The site at Otterbourne consists of an area of land that measures about 6.4 hectares with about 2.8 hectares of open space and about 3.5 hectares of developable area*” (para 14.153). This in itself should raise alarm bells to the local community; given the area of land they believe to be developable is just that parcel which equates to 1.69 hectares. Indeed, there would no doubt be significant ecological concerns in removing the woodland area, which is required to be retained under the draft policy and was also required to be retained under the previous planning applications.
- 3.41 There has also been no evidence provided to support the allocation in terms of Gladman's ability to gift an area of open space (land surrounding the public right of way) to the Parish Council under their current land agreement. Such agreements will have a minimum price per acre of land which would have to be achieved irrespective of whether the development on it is housing or open space – there is no certainty the land agreement Gladman hold will allow the flexibility to secure all the land for public open space and it is Barwood's experience that ‘normal’ land agreements are unlikely to achieve this. This raises questions around this claim, which is unlikely to be answered until a S106 agreement is drawn up as part of a detailed proposal. If this allocation were to be progressed, Gladman should be requested to provide details of how this land will be secured so the Parish Council have more confidence that this can be delivered in reality.

- 3.42 The area of land which is apparently to be gifted to the Council, is well-used, publicly accessible land and development here would impact on the currently unspoilt views from the public footpath. Indeed, moving the footpath adjacent the treeline which would border the new development would significantly impact the view of surrounding open space.
- 3.43 Unlike Land off Cranbourne Drive (to be covered in section 4), there is also no strong defensible boundary in this location. This could in turn lead to further development creep into the countryside if this allocation were to be pursued; something likely greatly opposed to by the local community.
- 3.44 Indeed para 14.158, which includes supporting text for Policy OT01 it is stated that the Parish Council have requested that the settlement boundary only be extended to include the developable part of the site. Although whilst the Policies map accessible from the Reg 19 consultation page includes proposed allocations, there appears to be only access to the existing settlement boundaries. If indeed they are amending these to include the proposed allocations (as should be the case) it is queried as to why the Policies map has not been updated to reflect this and we question whether the Council is amending the settlement boundary to include the developable part of OT01 or not, if they are this should be appropriately consulted upon.
- 3.45 Paragraph 14.117 of the Local Plan states “*Only part of the site is being promoted for development of about 55 dwellings. It is anticipated that the developable area of the site would comprise only that area consisting of the field bordering the length of Main Road, infilling only as far back as the current building line between ‘The Old Forge restaurant’ and the houses further up Main Road as far as Charlotte Mede, bounded by the hedgerows and tree line to north/south/east (all for retention) and the potential fourth access spur off the Coles Mede roundabout*”.
- 3.46 Assuming a link between the site and the remaining open space will be required, this is likely to significantly change the landscape, and the views benefited from this well-used public right of way; and again, could raise significant ecological concerns, in the breaking up of the existing extensive hedgerow. The more discreet the link the less able future developers would be to utilise the space proposed to be retained, to deliver anything other than open space as it is. Therefore, requirements such as a local area for play (LAP) would need to be delivered on the parcel of developable land within the treeline, reducing again the land available to deliver the required housing. There would no doubt be concerns regarding surveillance if the play area were not delivered with overlooking properties.
- 3.47 The draft Local Plan policy OT01 states in vi. that the development should “*Identify and protect the existing key landscape features and TPO’d trees on the site*”.

- 3.48 Areas of Land east of Main Road covered by a Tree Protection Order (TPO) include:
- A single tree within the grounds of Hecton Farmhouse on the south side of the access.
 - Two individual trees within the grounds of Hecton cottage on the south side of the access.
 - The tree belt between the triangular area and the rest of the site.
 - The perimeter trees on the southern and eastern boundaries together with those down the boundary dividing the two open fields.
- 3.49 The policy fails to acknowledge that the trees fronting Main Road and between the proposed developable area and open space are all covered by a TPO and therefore impacting this would be inevitable in order to deliver any proposed access to the site or permeability to the open space.
- 3.50 In terms of heritage considerations, development on this site has the potential to impact a number of listed buildings in close proximity. In terms of the non-designated heritage asset of the Old Forge Public House to the north, an element of heritage harm would be unavoidable. This is an important village asset with views from the public house looking out onto the field proposed for development.



Figure 12. View from the entrance of the Old Forge PH onto the allocated site.

- 3.51 The Built Heritage Statement originally included with the 2019 planning application submitted by Gladman on this site identifies a ‘harmful’ impact to one of the listed buildings in proximity; namely the Old Parsonage on the opposite side of Main Road. The consultation response from the Council’s conservation officer identifies more ‘harmful’ effects on listed buildings, principally in respect of the Grade II listed Otterbourne House, located to the south of the site.

- 3.52 Whilst in each assessor's consideration of the heritage impact would be less than substantial this would still need to be considered in the planning balance and cumulatively this highlights that the heritage constraints impacting Land east of Main Road are more significant than at Land off Cranbourne Drive. Paragraph 205 of the NPPF requires 'great weight' to be given to the conservation of heritage assets (including their setting) and Paragraph 206 sets out that 'clear and convincing justification' should be provided for any harm to a designated heritage asset such as a Grade II listed building. Given this, we would question whether these impacts could be clearly and convincingly justified if the desired housing growth could be delivered on other sites elsewhere at Otterbourne with no or less impact in that respect.
- 3.53 In terms of considering the potential highways impacts of allocating Land off Main Road, our supporting consultants have reviewed the allocation and previous reasons for refusal behind the 2016 and 2019 applications and would again highlight potential areas for concern in relation to the allocation of Land east of Main Road.
- 3.54 Para 14.159 of the supporting OT01 policy text states that there are potential options for the proposed access, although focus on modifying the existing roundabout, as per the previous applications (Drw. No. P16017) and creating a 4th arm from the existing mini roundabout or upgrading it to a compact roundabout. The application drawing (P16017) does not show the visibility splays for each of the approaches affected (visibility right, 9 x 40-55m) which will affect the trees/vegetation at the entrance given the required widening of the opening. This was also a stated reason for refusal in the 2019 application. There is therefore currently no clarity in respect to the amount of tree and hedgerow loss that will occur to create the site access, and this could be considerable the significant costs associated with upgrading the existing roundabout, which could create viability concerns if only circa 30 dwellings are deliverable within the parcel of land suggested (again potentially putting further pressure on what is supposed to remain open space).
- 3.55 The collision potential at a four arm mini-roundabouts is also significantly higher than those with 3-arms, in fact these factors appear to have contributed to a larger collision cluster at the Kiln Lane mini roundabout in the village.
- 3.56 Whilst the proposals appear to protect the existing footpath which crosses the site (albeit the landscape assessment suggests this would be moved to along the treeline), there is little explanation on the change to the character of this much used and enjoyed route or how this might support the Council's Public Rights of Way Improvement Plan.



Figure 13. The public right of way bisecting the Gladman site.

- 3.56 In terms of accessibility, severance (ability to crossroads) has an effect on a community's willingness to walk, depending on traffic flows. In reviewing the flows on Main Road that were just into 'high' threshold, pre-pandemic; post pandemic they may have fallen, so may now be into 'Medium'. There are various uncontrolled (refuge islands) and controlled (puffin) crossings. When these are away from the desire line, the diversion increases the effect.
- 3.57 The traffic flows necessitate refuge islands, some of these are narrow so might not support parent/buggy & bikes. The traffic flows on Main Road are tidal (>800/300 north/south (AM); <400/700 north/south (PM)) so it would be harder to identify gaps in the traffic to cross, particularly to get to the school.
- 3.58 As the flows are tidal in the morning, they will have some effect on willingness to walk to/from primary school and other nearby facilities and could therefore lead to increased numbers driving to school, as opposed to delivering a site adjacent to the local school whereby walking would be actively encouraged.

Consideration of other suitable sites in Otterbourne

- 3.59 Whilst we provided a review of other suitable sites in response to the Reg 18 Local Plan consultation, given the points raised have not been responded to, and certain sites are still considered potentially suitable if Land of Main Road fails to meet the housing needs required, we have again through this consultation provided our review of these alternative sites.
- 3.60 As set out in paragraph 6.41 of the Development Strategy and Site Selection 2024 report "*The parish council has also considered site OT05 as a secondary option, but this is not needed at the present time in order to meet the housing number. They are continuing discussions in the event that they should need to consider an alternative development site. If needed this site could bring forward around 5 – 11 larger houses if needed*". Alongside OT05 (Land off Waterworks Road), OT04 (Park Farm, Kiln Lane) was also reviewed as an alternative site. Our own assessments of these alternative sites, however, raise concerns over the known

constraints in these locations and their perceived deliverability which we consider should preclude them from further consideration.

OT04 - Park Farm, Kiln Lane

- 3.61 This site is located to the east of Otterbourne, and according to the SHELAA the site is currently in agricultural and residential use. The site is accessible from Kiln Lane and is adjacent to residential to the north, west and east and agricultural land to the south.
- 3.62 The main concern in relation to the delivery of this site relates to heritage, which our supporting heritage consultant EDP has indicated would be hard to overcome.
- 3.63 The site is located to the rear of three Grade II listed buildings: namely Otterbourne House (in the north), Cherrytree Cottage (in the centre) and Elderfield (in the south). In view of the site's proximity to the listed buildings and its open character on at least the west side, it is difficult to envisage how the site could be developed in a way which would not result in some degree of harm being caused to their significance. Even if this were to be considered less than substantial, the harm would still require a '*clear and convincing justification*' (NPPF Para 206); which would be difficult to achieve given there are sites elsewhere in Otterbourne that could come forward and deliver the desired housing growth with less or no harm to designated heritage assets. The conclusion of our consultant's view on the suitability of this site for development was that "*Overall I think that OT04 is distinctly problematic from a heritage point of view and it is easily the worst of the sites on offer at Otterbourne*".
- 3.64 Despite this the site has scored "green" in the 2023 SHLAA for all historical constraints; again, highlighting inaccuracies in the supporting evidence.
- 3.65 Ecology would also present a significant barrier to development in this location. There is a blanket TPO covering the site, which includes the strip of woodland along Kiln Lane. It is anticipated that trees within this woodland would require removal to facilitate access to the site and the required visibility splays would also result in a significant loss of vegetation across this frontage.
- 3.66 In landscape terms OT04 is open to filtered views from Kiln Lane, a road that is currently rural in character and which has little existing development in views and would therefore have a negative impact on the rural character of this location.
- 3.67 In terms of highway concerns, Kiln Road is circa 5m wide with no footway and limited verges, and therefore the ability to provide pedestrian access here would be difficult, particularly without harm to the adjacent listed building. The introduction of any footway provision in this location would also lead to further narrowing of this already restrictive lane.

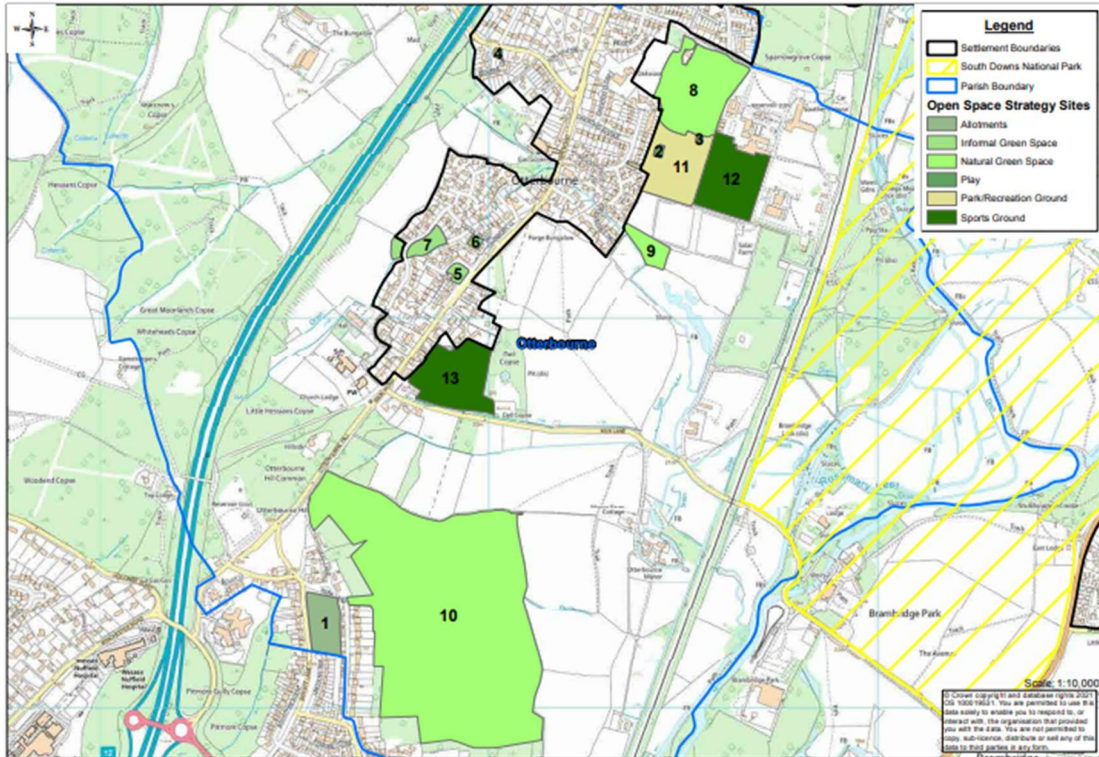


Figure 14. Winchester Open Space Assessment

- 3.67 The above plan was taken from the Winchester 2022 Open Space Assessment which is another evidence document supporting the Local Plan. Within this Assessment this site is recorded as a Sports Ground utilised as Elderfield Junior Cricket Pitch (Site 13). Given this we would therefore question if the use of this site has been correctly recorded. If it is indeed utilised for junior cricket, England and Wales Cricket Board may well object to this loss; and any loss may also require the delivery of alternative provision elsewhere.
- 3.68 Overall, due to the heritage, highway, landscape and ecological constraints faced by this site, we suggest this should not be considered to be a viable development site when assessing the reasonable alternatives.

OT05 – Land off Waterworks Road

- 3.69 This site is located to the east of Otterbourne, and southwest of the district. According to the 2023 SHELAA the site is currently in agricultural and residential use. The site is accessible from Waterworks Road and is adjacent to residential to the north, west and south and woodland to east.
- 3.70 Our concerns in relation to the potential allocation of this site are largely focused on highways and ecology, both concerns reiterated within the Parish Council’s own assessment.
- 3.71 In terms of ecology the entirety of the eastern site boundary is adjacent to Oakwood Copse SINC, with a development here potentially impacting this. Sparrowgrove Copse, another SINC site is located 200m east. The potential for protected species at this site is mostly associated with the adjacent woodland and mature trees, with bats and birds likely to be the biggest constraints. The woodland to the north of the site, where access would be required, is also covered by a TPO. A number of these TPO’s trees would therefore be lost through required improvements to the access (including visibility splays). Due to the small size of the

site and the existing use, it is very unlikely a 10% BNG net gain would be achievable on this site.

- 3.72 Waterworks Road is a private road, with discontinuous footways. It is subject to a posted 20mph speed limit, but this cannot be enforced nor is it supported with traffic management measures to manage speeds to this level. Within the Parish Council's own assessment, it is stated that Waterworks Road is privately owned by Southern Water and not highly suited to traffic, also acknowledging that access to the site and land levels are less than ideal. It is further noted that due to a lack of driveways, existing residents of Waterworks Road park their cars along the street, making it single carriage for large extents.
- 3.73 The site is also considered to be the least accessible, being located over 1km from the primary school. Given this distance it is unlikely to support children/ parents walking to school. Whilst we should be able to expect people to walk this distance, because of the escort nature of taking young children to school, this would require parents to walk over 2 km (there and back); resulting in them being more likely to drive and add to existing traffic in peak hours.
- 3.74 Due to the highway, arboricultural and ecological constraints faced by this site, we do not consider that it can be considered a viable development site, particularly when assessing the reasonable alternatives.
- 3.75 To conclude, neither OT04 or OT05 are considered suitable sites to deliver further housing in Otterbourne and should therefore not be considered suitable as 'reserve sites' if, as we predict will be the case, Land of Main Road is unable to deliver the required housing numbers.

Conclusion

- 3.56 While allowing a community to decide which allocation should be progressed is laudable in the context of Localism, such an approach to decision making needs to be consistent and made with proper regard to technical planning matters. It is apparent here that the Parish and the community were provided with a flawed evidence base and were not supported by WCC in terms of planning considerations.
- 3.57 In March 2022, the local community did not support the draft allocation of site OT03, with site OT08 at Cranbourne Drive being preferred by a higher number of respondents. However, without further guidance and in the context that they had only had discussions with the owners of site OT03 at that point in time, in May 2022, the Parish Council wrote to WCC stating that they would support OT03 but also importantly, that they were still considering alternatives, and that further analysis of these alternatives (including OT08) was required. However, no further technical planning support was given by WCC, and this further analysis was not undertaken.
- 3.58 To conclude on this question, Barwood Land strongly object to the housing allocation of Land east of Main Road and as evidenced, are also of the view that Land off Cranbourne Drive provides the only feasible alternative development site in Otterbourne.

3.59 Land off Cranbourne Drive (see section 4) is a far more suitable allocation as it is largely unconstrained, able to deliver all the required housing and with numerous benefits to the local community. It is maintained that insufficient evidence is available to support the current allocation, further evidence is required including the provision of responses to the questions raised by Barwood Land as set out in the Reg 18 consultation response, the follow up letters to the Policy Team and again through this Reg 19 consultation. The Plan submitted for examination should (given the known constraints) at the very least include a reserve site (capable of being delivered to meet the required needs) if Land off Main Road does not come to fruition or is progressed without the backing of the local community.

4.0 LAND OFF CRANBOURNE DRIVE

4.1 Barwood Land continues to maintain that the site progressed for allocation under OT01 has a series of constraints which have yet to be addressed and it should not be considered the most appropriate site for allocation in Otterbourne, based on these constraints and the consultation with residents of the village undertaken by both the Parish Council and Barwood Land. The evidence and justification used to support Policy OT01 is not considered robust, and it is therefore felt that policy OT01 as currently drafted is unsound and unjustified.

4.2 Barwood Land continue to promote Land off Cranbourne Drive, Otterbourne as a far more suitable (and supported) allocation for Otterbourne in the Local Plan. As highlighted through these representations this site is far more technically suitable to deliver the housing required in Otterbourne and will provide significant benefits for residents and the wider village population. Summary details are set out below, with further background on the site context, opportunities and constraints and current indicative proposals.

- **Address:** Land off Cranbourne Drive, Otterbourne
- **Easting/ Northing:** 445719 / 123245
- **Total area (ha):** 14.5 ha
- **Land type:** Greenfield
- **Ownership:** Single Ownership and the landowner has given permission for this site to be submitted and is committed to ensuring the delivery of a scheme which provides benefits to the local community.
- **Availability:** Available for development now
- **Constraints:** No significant constraints.

1.11 The Reg 18 Local Plan representations were supported by several high-level technical reports/ plans, whilst that proposed at Land of Cranbourne Drive has evolved from this point for completeness the following documents have again been submitted to support these representations as they provide further detail on the site (see Appendix 5).

- Vision Statement for Land off Cranbourne Drive
- Transport Assessment (PJA 2022)
- Access Plan (PJA 2022)
- Flood Risk Appraisal (PJA 2022)
- Preliminary Ecological Appraisal (Tyler Grange 2022)
- Heritage Assessment (EDP 2022)

The Site and Local Context



Figure 15. Site Location Plan – Land off Cranbourne Drive

- 4.2 Land off Cranbourne Drive is located on the western edge of the village of Otterbourne and sits adjacent to the settlement boundary. The site covers an area of 14.5 hectares (ha) of agricultural farmland and woodland. The land is both physically and visually contained, bordered by a recent plantation woodland along the western boundary (flanking the M3 motorway) and to the east (with the residential properties of Cranbourne Drive beyond this). The northern boundary goes up to the existing treeline and further mature woodland borders the site to the south.
- 4.3 The village of Otterbourne is well served by a variety of local facilities including a village hall, church, primary school, convenience store and pubs, with these local amenities and services all within walking distance of the site. As has been discussed in section 2, the village should also be considered as part of a cluster of villages which provide numerous services to residents of Otterbourne.
- 4.4 Otterbourne is located approximately four miles (6.4 km) south of Winchester and eight miles (13 km) north of Southampton.
- 4.5 The nearest bus stop is just 40 metres north of the proposed access (south-bound) and 150 metres (north-bound) providing regular services to locations including Winchester, and Southampton, via Eastleigh. There are also three railway stations located in close proximity to Otterbourne. Shawford Station (around 2.5km to the north), which provides excellent access to Winchester and beyond; and Eastleigh and Chandlers Ford stations (located 3.5 to 4km from the site in a south and south-easterly direction).

Housing allocation for Otterbourne

- 4.6 Under Policy OT01, the Reg 19 Local Plan currently allocates Land off Main Road (also known as SHELAA site OT03/ the Gladman site) for 55 dwellings. However, as is highlighted in the Development Strategy and Site Selection 2024 document, there are a number of caveats to this. Indeed, it is acknowledged that the Parish Council were considering other sites which may be more suitable and had previously asked the Council for further advice on the site assessment process which was never received.
- 4.7 As set out in our response to the consultation question OT01, our own review of the proposed allocation, highlights a series of constraints impacting the site's suitability for allocation in the Local Plan, including its ability to deliver the required housing on the site area specified.
- 4.8 Barwood Land is aware of the many objections raised by residents to the various previous planning applications submitted by Gladman on Land off Main Road, which reflect the responses received to our community consultation (see appendix 4). As such, in collaboration with The Chamberlayne Estates, they put forward land off Cranbourne Drive, as an alternative location for the identified housing need, or alternatively as a location to accommodate a greater level of growth should the Council expand the housing provision here – which we consider it should as previously outlined, particularly taking note of the increased housing numbers facing Winchester through the updated SM.
- 4.9 In reviewing Land off Main Road, it is clearly apparent that the site is more constrained regarding landscape, heritage, and access / accessibility. Indeed, the previous planning applications at the Gladman site were refused by the Council due to the landscape impact of the development and its impact on the rural context of the village.
- 4.10 Unlike Land off Cranbourne Drive, Land off Main Road has limited opportunities to deliver lasting benefits for the community, and indeed its delivery could actually greatly impact an area of publicly accessible open space well-used and enjoyed by existing residents. Given the site's location with no strong defensible boundaries between the site and countryside this could also open the gate to further development creep. Conversely, Land off Cranbourne Drive is visually and physically enclosed by extensive tree coverage (and the motorway beyond this) and therefore development in this location would not result in any significant landscape harm or incremental development into the countryside, with minimal impact on local or long-distance views. The site is also not publicly accessible but will be made so as part of any development, greatly enhancing the recreational offer in the local area.
- 4.11 Land off Cranbourne Drive provides a great opportunity to meet the housing needs of the village in a comprehensive manner. It will not only meet the identified future housing needs

in a plan-led way but will also deliver a number of other benefits and new/improved facilities and infrastructure that will benefit the whole local community, including providing significant opportunities to enhance green infrastructure provision in the village in line with emerging policy NE4 and the safeguarding of land for a community building/ health facility.

- 4.12 There is much to celebrate about the characteristics of the site, surrounding existing development and local settlement form. Design of the development at Land off Cranbourne Drive will be heavily influenced by this context whilst also meeting the requirements of sustainable low carbon policies that will ensure the site is prepared for, and adaptable to, emerging technologies and building practices that will help to limit climate change.
- 4.13 The scheme can be designed to ensure a seamless extension of the village, with a high-quality design and focus on providing links to both the natural environment and existing local facilities such as the village hall and primary school. Attractive public open space will be key to the delivery of this scheme and opening up the rural environment and links beyond.

Site Analysis

- 4.14 Preliminary work undertaken by various technical specialists, covering highways, ecology, heritage, landscape, noise and drainage, has underpinned the proposed indicative design. This work has helped identify the constraints and opportunities associated with the site, important issues for the masterplan to address, and enhancements which could benefit the scheme overall.

Highways and Accessibility

- 4.15 Transport consultants PJA were commissioned to consider the access arrangements and confirm a technical access solution is achievable – their initial report accompanies these representations, with further, more detailed assessment work currently ongoing.
- 4.16 The single access to the site is proposed off Cranbourne Drive (adjacent to no. 45) and early analysis confirms the access can be delivered with suitable visibility. An indicative access drawing has been submitted alongside these representations.
- 4.17 The proposed development would likely to result in 30-40 vehicles per hour (two-way) during peak hours, or a little over 300 vehicles per day. Subject to the distribution of traffic (north/south) this is unlikely to be perceptible for most, representing one vehicle every 3-4 minutes on sections of Cranbourne Drive/Coles Mede.

- 4.18 The site is highly accessible and benefits from a number of public transport links to surrounding areas, with bus stops located north and south bound, both within 150 metres of the site access. There are also three train stations within four kilometres of the site in Shawford, Eastleigh and Chandler's Ford.
- 4.19 In line with Strategic Policy T1 the site looks to encourage sustainable and active travel with pedestrian and cycle linkages forming a central feature of any future proposals. Including opportunities to link up the existing Public Rights of Way (PRoW) and creating a circular walk around Otterbourne (as promoted through policy T1 vi). There is also potential to improve the existing bridleway which connects this area to Shawford and the rail link opportunities available there.
- 4.20 PJA's assessment of the suitability of Otterbourne for future housing growth, reviewed the Council's Settlement Hierarchy and concluded that Otterbourne functions as one of several villages afforded good levels of accessibility if considered as part of a polycentric network of adjoining villages. As Otterbourne is close to other settlements it is accessible to a significant number of amenities and services within walking/cycling distance, commensurate to that expected of a much larger settlement.
- 4.21 The pedestrian environment surrounding the site is generally suitable to support walking for transport, having been improved in recent years. There are also significant stretches of the PROW network located near the site, oftentimes connecting with adjacent settlements using off-road footpaths. As part of the site promotion there are opportunities to preserve and enhance existing links, potentially linking existing footpaths through the site, village hall car park and to the school.

Heritage

- 4.22 Heritage consultants EDP have considered any heritage constraints which might impact the proposals. Important features to consider around the site include the Grade II* listed Church of St. Matthews and more widely the setting of the Grade II* listed Cranbury Park. However, the spatial separation and significant landscape screening surrounding the development site is considered to adequately and effectively protect these designated assets.
- 4.23 It concludes that, whilst there are 14 listed buildings within the wider surroundings of the site which could potentially be affected by its residential development, in reality only the Grade II* listed Church of St. Matthew has a relationship with the land at the site which bears upon its significance and means that it could be adversely affected (i.e. harmed) by its development.

- 4.24 However, the retention of the enclosed agricultural fields to the west and south of the Grade II* listed church as Public Open Space would serve to maintain and protect the setting of this heritage asset and ensure there is no harm caused to its significance.
- 4.25 The south end of the site (the woodland) includes the north-eastern aspects of Cranbury Park Grade II* Registered Park & Garden (RPG), whilst the centre and north of the site also fall within the wider setting of this designated asset and contribute to its heritage significance. However, the contribution which the land makes to the significance of the RPG is 'very small'.
- 4.26 For the most part, the relationship between the site and Cranbury Park is little more than spatial and there is almost nothing in the contemporary experience of the RPG to enable its significance to be experienced or appreciated. It is only the presence of the lodge, gates and metalled entrance track behind the parish church which illustrate the designed origins of the woodland and these features are all located to the south of the site's southern boundary in a location visually separate from the part of the site that would accommodate housing. Hence, it is concluded that the site's relationship to the RPG, where it includes some peripheral elements and falls within its setting more generally, is not an 'in principle' adverse effect or overriding barrier to its allocation and development. Indeed, the development of the site could bring forward an opportunity to directly enhance the significance of the park, by opening up public access to the spaces around the designated heritage asset, from where its significance can be better revealed.

Ecology

- 4.27 Ecology Consultants Tyler Grange have been commissioned to review any ecological constraints associated with the site and any potential impacts of delivering housing in this location. Such considerations are important given the location within the nutrient sensitive area of the River Itchen SSSI and adjacent SAC, as well as hosting habitats of ecological interest.
- 4.28 Initial assessments have confirmed the importance of retaining and where possible enhancing any ecological features found on the site, including the bordering trees. Housing development should also be restricted to those habitats of negligible ecological importance (poor semi-improved and improved grassland) which is why the land adjacent the SINC (northwest of the Village Hall) is proposed to be retained for open space and potential recreational opportunities, including educational features such as wildlife trails, if they can be sensitively designed alongside the important ecological features.
- 4.29 We are in the process of considering the most appropriate approach to phosphates mitigation, this is likely to include either provision of an onsite tank (wastewater treatment

plant) which would be managed by an appropriate statutory undertaker or the purchase of credits, confirmed as appropriate by Winchester City Council in its pre-application response regarding this site. Through either option it is considered that nutrient neutrality could be achieved on this site.

- 4.30 The requirement to achieve Biodiversity Net Gain (BNG) in new housing developments refers to the concept of leaving the natural environment in a measurably better state than it was beforehand. Given the incorporation of open space, a wild meadow, planting and other green infrastructure opportunities, the site will be able to deliver significant biodiversity enhancements over and above the 10% requirement set by emerging national policy.
- 4.31 The Preliminary Ecological Appraisal concludes, several ecological issues have been identified that could affect the principle of development or significantly affect the quantum of development. These issues pertain to the presence of the site within the nutrient sensitive areas of the River Itchen SSSI and SAC and wider Solent Region, the presence of non-statutory sites within or adjacent to the site, the presence of priority habitats and habitats of ecological interest within the site, and the potential for the site to support several protected or notable species.
- 4.32 However, based on the incorporation of the mitigation measures described below, the development has the ability to be compliant with existing and emerging local and national planning policy and legislation:
- A mitigation strategy to achieve nutrient neutrality;
 - A LEMP which includes strategies to protect SINC's on and adjacent to the site and the delivery of a long-term management plan to ensure the security of created and retained habitats, including priority habitats;
 - Proposals that ensure that they deliver the requirements for biodiversity net gain in line with current policy and legislation. Where this isn't possible within the red line boundary, off-site mitigation is likely to be required; and,
 - The use of results of protected/notable species surveys to inform any detailed site layout/design and embed mitigation.

Drainage

- 4.34 Drainage consultants PJA have undertaken an initial drainage assessment and have produced the supporting Flood Risk Appraisal technical note which considers that the proposed residential development may be delivered sustainably, without increasing flood risk or having a detrimental effect on water quality.

- 4.35 The majority of the site is located within flood zone 1, with a small part to the southwest boundary overlapping a flood zone 3 designation. Considering this, the proposed layout is designed to ensure all of the proposed dwellings fall within flood zone 1 and would not therefore be at an increased risk of flooding.
- 4.36 It is well understood that one of the effects of development is typically to reduce the permeability of the site and consequently to change its response to rainfall. Therefore, a suitable surface water drainage strategy is required to ensure that the surface water runoff regime is managed appropriately and that there would be no increased flood risk to third parties.
- 4.37 The proposed surface water management strategy will be derived based upon the principles of Sustainable Drainage Systems (SuDS), which is likely to include an attenuation basin and a network of swales designed to offer the treatment for water quality improvement and wider ecological benefit – an emerging drainage design has been incorporated into the current master plan for the site.

Noise

- 4.38 The site is located within close proximity to the motorway and therefore noise has previously been raised as a potential constraint. Initial noise modelling suggests the site can be delivered to achieve acceptable internal and external noise levels subject to additional mitigation including the bolstering of the existing landscape buffer, provision of an acoustic barrier, building envelope mitigation and careful scheme design to ensure the orientation of the buildings will also reduce potential noise impact to gardens.
- 4.39 The development will also likely deliver betterment to the existing residents of Cranbourne Drive in terms of noise levels. Additional modelling work is currently being undertaken to test mitigation options and this can be provided once available.






















Emerging Proposals

- 4.40 The illustrative masterplan shows an emerging spatial framework for the delivery of a residential development (including provision of a retirement living accommodation to meet a acknowledged need), alongside safeguarding land for a community facility, setting this within a generous network of open space, green infrastructure linkages and provision for opportunities to enhance connectivity to the surrounding natural environment and key community facilities. This emerging layout has been fully informed by the technical evidence base outlined above. The proposals were also informed through engagement with the Parish Council and in undertaking our own public consultation.

4.41 The current development proposals include the following:

- Between 60-65 dwellings including 35/40% affordable.
- A 70-bed retirement living complex to address a growing need for elderly accommodation, identified in the Local Plan.
- To include a range of housing types including smaller 2-3 bed homes suitable for young families (supporting the local school) and older residents (looking to downsize).
- To provide safeguarded land on site for a health / community facility, identified in the community consultation, which other sites have insufficient land to provide.
- To incorporate a generous level of undeveloped open space including a wild meadow, play area and parkland (nearly 7 hectares/ 17 acres).
- To enhance boundary planting around the perimeter of the site, further screening existing residential properties, providing a suitably landscaped buffer/ open space between the site and residents of Cranbourne Drive to protect the privacy and residential amenity of these existing dwellings.
- The potential to create a link between the village hall and the site and therefore connect the proposed Local Area for Play to existing community facilities.
- The potential to deliver a new footpath to join the existing public rights of way with the opportunity to provide an attractive circular walk around the village.
- The gifting of existing woodland to the south of the site to the Parish Council to ensure this is publicly accessible with the potential to deliver enhanced pedestrian and cycle trails through the woods. Residents would be able to use and enjoy this space as amenity woodland, forming a natural extension to Otterbourne Hill Common and offering footpath connectivity to the existing network.
- To provide Sustainable Urban Drainage (attenuation basin/ swales) with a site appropriate phosphate mitigation approach.
- To deliver significant biodiversity enhancements over and above the 10% requirement.
- To improve pedestrian and cycle connectivity to Shawford Station.
- To provide further noise mitigation to significantly benefit both existing and future residents.

- 4.43 The table included in figure 16 overleaf again highlights these benefits and provide a direct comparison between Land off Cranbourne Drive and Land off Main Road. The table clearly shows there are multiple benefits associated with Land off Cranbourne Drive which simply cannot be realised through the current proposed allocation.
- 4.44 The indicative layout plan provided in figure 17, shows how the scheme could be delivered to accommodate the proposed benefits alongside meeting Otterbourne's housing need.
- 4.45 In conclusion to Section 4, as noted in the objection to Policy OT01, it is considered that Land off Main Road is not suitable to meet the needs of the village and has a series of constraints which should have through a robust assessment put alternative site Land off Cranbourne Drive as the preferred allocation for Otterbourne; a point also backed through both the Parish Council and Barwood Land's own consultations.
- 4.46 Land off Cranbourne Drive is largely unconstrained and can meet Otterbourne's housing need on one site, alongside multiple benefits and will not intrude on land currently well-used by the local community.
- 4.47 It is considered that given the constraints raised, Land off Cranbourne Drive represents a far more appropriate housing allocation and thus should replace OT01 as the preferred allocation for Otterbourne.
- 4.48 Also, If the Council is requested to look to find additional sites to meet the huge additional needs for the district, borne out of the updates to the SM and need from neighbouring authorities, this site also offers a suitable opportunity to assist in addressing this wider requirement whilst also better reflecting the scale of the need for Otterbourne itself.
- 4.49 To further understand this additional need, if we consider the uplift in housing requirement across the district (i.e. new SM would require c. 23,079 dwellings - when incl. 5% buffer) then by following the same spatial distribution as currently progressed, Intermediate settlements would be expected to deliver c. 550 dwellings, and again breaking this down to individual settlements, Otterbourne would be required to deliver c. 118 dwellings by 2040. To meet this additional need, the Council will need to include additional allocations, and Otterbourne, (being a sustainable, well-connected settlement) is well suited to accommodate this additional growth.

ASSETS ALLOCATION OPTION	LAND OFF MAIN ROAD (SOLELY RESIDENTIAL)	LAND OFF CRANBOURNE DRIVE (MIXED-USE SCHEME)
Delivering Otterbourne's allocated housing on one site		
Providing land to deliver a community facility (i.e. GP surgery, dentist, nursery or other community facility)		
Supporting an ageing population through provision of specialist accommodation		
Supporting those in need through the provision of Affordable Housing		
The provision of large areas of public open space (including wild meadow and parkland)		
Delivering a site with defensible boundaries which will not open the door for further future development		
Delivering a site well-linked to the local school		
Providing enhanced public rights of way linkages and the potential for a circular walk		
Potential to improve the existing connections between this area and Shawford Station		
Reducing carbon emission and mitigating the impact of climate change		
Protecting environmental assets		
Delivering a site with limited landscape impact		

KEY



HIGH BENEFIT



SOME BENEFIT



NO BENEFIT

Figure 16. Table comparing Land off Main Road with the preferred allocation at Land off Cranbourne Drive



Figure 17. Indicative Parameters Plan

5.0 CONCLUSIONS

- 5.1 This document has set out Barwood Land's response to the Reg 19 consultation on Winchester City Council's Proposed Submission Version of the Local Plan. Barwood Land has been actively involved in the Local Plan process over the last two years, having previously submitted representations to the Reg 18 Local Plan and also submitting Land off Cranbourne Drive through the Councils SHELAA and Call for Sites.
- 5.2 As part of the Reg 18 Local Plan consultation response, important questions were raised regarding the proposed allocation for Otterbourne and the evidence to support this; alongside general concerns regarding the level of housing growth which was considered too low to accommodate the necessary buffer to support under delivery, changes in the SM and the needs of adjacent more constrained authorities through the DtC. These issues have not been appropriately addressed through the Reg 19 Local Plan, and most significantly in terms of housing need, the plan now also fails to incorporate a buffer to accommodate the acknowledged changes coming out of the proposed SM update that is likely to be ratified by the end of the year, which include a significant increase to Winchester's housing requirement.
- 5.3 In relation to the progressed allocations, specifically the site in Otterbourne, questions raised through the Reg 18 consultation around the deliverability of the site 'Land at Main Road' and the evidence behind the allocation, have remained unanswered. In reviewing the minutes of the scrutiny meeting held to discuss progressing the Reg 19 consultation, it is clear this is also the case for a number of sites across the authority area. Instead of taking the time to answer these questions and ensure the evidence behind the allocations progressed is robust, the Council has instead opted to fast-track the Local Plan to examination, to avoid having to deal with the increasing housing need to come out of the proposed update to the SM. This is the antithesis of good planning as these changes are coming imminently and the Council are simply looking to delay dealing with this significant issue. This naïve approach will further constrain supply and delivery and mean that a large shortfall accrues in the coming years that will mean its plan will be out of date at the point of adoption and will remain so for years to come without urgent remedial action.
- 5.4 As is highlighted in these representations Land off Cranbourne Drive has and continues to be promoted as a more robust and deliverable allocation for Otterbourne, which will result in lasting benefits to the village. The site also offers an additional housing allocation opportunity, which will assist the Council in meeting a more appropriate housing requirement that will result from the SM update. The indicative proposals for Land off Cranbourne Drive would see the delivery of around 65 new homes, alongside a variety of other benefits including significant

areas of open space, care provision, land for a community/ health facility, attractive green linkages to the wider rural countryside and opportunities to enhance access and enjoyment of the woodland. This site was supported by a greater proportion of the community when it was considered alongside the current draft allocation in a local consultation event in March 2022 and again through the more recent consultation held in summer 2024.

- 5.5 Our consultation response also highlights that the plan continues to focus too heavily on growth in Principal Settlements and Market Towns, without fully realising the potential of smaller settlements, which often have the community services and facilities required to support a greater housing uplift (such as Otterbourne) and are often the places which struggle to deliver the affordable housing required to meet their need. Past plans have also retained focus on the Principal Settlements and Market Towns, rather than a more balanced approach, and delivery has failed to meet requirements as a result.
- 5.6 As we have raised through these representations it is our view that based on the SM update alone, which will result in a significantly increased housing need requirement for Winchester, it is necessary to update the Plan to include significantly more allocations to meet this pending uplift. The Government has been clear that plans should not be progressed, if prior to submission, the difference between the existing SM figure and that proposed is more than 200 dwellings. As acknowledged the difference in the emerging Winchester plan is more than double this, and we cannot therefore think of any justifiable or indeed sound reason as to why the Local Plan should be progressed without considering this need.
- 5.7 Based on the above considerations the Plan as it stands clearly does not pass the tests of soundness. It has not been “positively prepared” as it significantly under delivers against the districts upcoming housing need and does not include appropriate buffer provisions. The Plan is not “justified” as it does not fully consider appropriate alternative growth scenarios including the increased role of those smaller, sustainable settlements. More specifically for Otterbourne the allocation progressed is also not justified based on the evidence available. The Plan is not considered “effective” as it is unlikely to deliver the required growth to meet the identified need across the plan period and finally it is not “consistent with National Policy” as it fails to take account of the countries direction of growth, and upcoming changes to the NPPF and SM.
- 5.8 Accordingly, we strongly recommend that the Council reassesses its position, most importantly by looking to at least meet the minimum requirement set by the updated SM, as not doing so clearly undermines the soundness of the Local Plan.

APPENDIX 1

Letter sent on behalf of Barwood Land to Winchester
Policy Team following publication of their Reg 18
Summary of Responses (23/08/2024)

Date 23/08/2024

Our Ref:735

helen@grassroots-planning.co.uk

0117 930 0413

Planning Policy Team
Winchester City Council
City Offices, Colebrook Street
Winchester
SO23 9LJ

Dear Planning Policy Team,

Re: Winchester Local Plan Assessment of Regulation 18 Responses

Thank-you for your recent e-mail received 16th August 2024, which provides a response to the concerns raised regarding the Council's assessment of alternative sites and the Regulation 18 Local Plan consultation responses (set out in the e-mail sent 31st July 2024).

Whilst we are grateful for a response given how busy the policy team must be with fast-tracking the Local Plan to examination; unfortunately, the response received does not answer any of the specific queries set out or provide any further reassurances on the assessment process. Given this, I have sought to again clearly highlight the points raised and whilst we acknowledge the current work pressures, I would gratefully request that we receive a full response to these. The issues will all become more apparent through the Local Plan examination, and we therefore believe it is in the Council's best interest to acknowledge, and appropriately respond to the concerns raised now.

Firstly, thank-you for confirming Barwood Land's representations were received. As the Policy Team will be aware a response was submitted via e-mail (to allow the submission of more detailed evidence) and for completeness to the online consultation; with the response we received to our e-mail submission confirming that the "*comments will be added onto our online consultation survey, Citizenspace*"(16/12/2022).

Whilst our representations to the Regulation 18 Local Plan consultation do include details of the site Barwood Land are promoting at Land off Cranbourne Drive (and the reasons we believe this is a far more suitable allocation for Otterbourne), it is clear that the submission formed an objection to Policy OT1 and should therefore have been recorded as such. See extract of our online representation confirming this on the following page.

OT01. Do you support the approach in policy OT01 - land east of Main Road?

Please select one item

- Yes, I support the policy
- I neither support or object to the policy
- No, I object to the policy

If no, please explain how these policies should be amended?

The policy should allocate Land off Cranbourne Drive as the most suitable allocation for development in Otterbourne. Please refer to supporting representations document submitted by Grass Roots Planning on behalf of Barwood Land via e-mail (to planningpolicy@winchester.gov.uk) on 14/12/2022.

Figure 1. Extract from Barwood Lands Representations to the Reg 18 Local Plan

There is clearly no reason Barwood Land's objection to this policy should not have been recorded under the summary of responses to Policy OT1. This incorrect omission of Barwood's objection to this policy in the summary document is untransparent and misleading to those reviewing the responses to the Local Plan and views on the Sites being progressed to allocation. Currently, Barwood feel that concerns regarding Policy OT1 have been dismissed purely because they are promoting an alternative site which is unacceptable.

It is not sufficient or robust to simply say that 'we should be assured the feedback was noted and taken account of in the analysis process'. As far as we can see there is no account of this and those scrutinising the documents would not have been aware of the full responses to this policy and the concerns raised. Again, with the representations we submitted to Policy OT1 missing from the summary of comments, the concerns raised have not been responded to (or in our view properly considered by the Council) or adequately reported to Members.

This point should clearly be addressed and Barwood's objection to this policy added to the summary document (with responses to the concerns raised) before the Local Plan is taken to Public Consultation and recirculated where relevant.

Summary of Representations to Policy OT1

As highlighted within the e-mail sent 31st July 2024, we note in reviewing the OT1 representations, that the summary states: 35 in Support, 7 Neither support nor object, 10 Object. However, the comments included in the summary document are for 9 objecting to the policy, 6 neither supporting or objecting and 6 in support. As previously set out, we therefore query who are these 35 responders who are supporting the policy and noting our own omission

whether this is indeed correct? **For transparency, as requested previously please provide an answer to this query.**

Again, as we noted in the above referenced e-mail, our representations to Policy OT1 of the Local Plan highlighted a series of concerns with this allocation which are not included in the representation summary document for the Policy and therefore no Council response has been provided to these legitimate concerns and questions. For your ease, a summary of our key representations made to the Regulation 18 consultation regarding Policy OT1 are as follows:

- The developable area of the draft allocation (when subtracting the land designated to the community for open space) is not large enough to deliver the allocated 55 dwellings. The masterplan submitted for the previous application shows only c. 33 dwellings in the developable area as allocated within the Plan. As such, either an extremely dense development would result or further encroachment on adjacent open space. Whilst it is noted that the northern parcel is c. 1.69ha, this includes a copse of trees and hedgerow which will need to be retained. Gladman's own planning application in 2019 considered the actual developable area of this parcel to be nearer 1.1ha which would lead to a very dense development of c. 50 dwellings per hectare, more akin to a city centre scheme than a suburban housing development. **We strongly feel that this point is being ignored and would appreciate a robust response to this being added to the OT1 representations summary given it was a key question within our reps to this Policy.**
- The previously refused applications on the Gladman site highlight landscape and access concerns, including an unacceptable impact on the local landscape character, and the setting of the village. **Acknowledging this, how is this site considered Negligible Uncertain (0?) in the Integrated Impact Assessment with regard to landscape, and no concerns raised in the SHLAA?**
- Unlike 'Land at Cranbourne Drive', there is no strong defensible boundary to future development. Concern has been raised that this could lead to further development creep into the open countryside. **Has this been appropriately considered?**
- There is no evidence of Gladman's ability to gift the remaining land east of the public right of way to the Parish Council as open space. **Has this issue been fully considered?**
- The Gladman site is well-used, publicly accessible land and development here would impact on the currently unspoilt views from the public footpath. **Regarding residential amenity, threat to a valued community asset and landscape impact, have these issues been fully considered?**
- Safety concerns have previously been raised regarding the addition of a further arm off the Coles Mead roundabout required for access to the site. **Has sufficient evidence been submitted to address this concern?**
- The distance between the school and the site would be less likely to encourage walking to school and could therefore increase traffic at peak times. **Given the increase in traffic was considered a concern for other omission sites, has this been appropriately considered?**

- There could be potential impacts on listed buildings in proximity including (Old Parsonage or Otterbourne House). **Has this been appropriately considered? Given the constraints highlighted why was the historic environment considered Negligible Uncertain (0?) in the Integrated Impact Assessment, and no concerns raised in the SHLAA**
- There are ecological concerns regarding the tree area that is subject to a Tree Preservation Order which would be impacted by implementing the access. **Has this been appropriately considered?**

Otterbourne Omission Sites

Regarding the ‘Omission Sites’ document, again as raised in our previous e-mail this document does not (as it should) provide a clear review of how those alternative sites were assessed or provide a summary of the opportunities or constraints associated with each. Whilst we acknowledge your response regarding the SHLAA and Integrated Impact Assessment (IIT), it remains that the summary document largely relies on the statement “*this was the preferred site of the Parish Council*”. Again, as we have highlighted this is despite the fact we have clearly demonstrated in the representations put forward and our own recent community consultation that this is not the preferred site of the local community. Given the concerns we have raised, it is clearly not a robust approach to rely on the fact that the site was once put forward by the Parish Council. As we have set out this is especially pertinent, as when they put the site forward, they requested further discussion with the Council which never took place, highlighted their own concerns with the proposed allocation and stated they were still considering other sites (as evidenced on Page 76 of the Council’s ‘Development Strategy and Sites Proposed Submission 2024’ document). **Is the Council content that they appropriately responded to Parish Council’s queries and requests for evidence when asking them to decide on the preferred allocation?**

We acknowledge in your response that the Winchester Council’s SHELAA Assessment and Integrated Impact Assessment did include a review of the sites in question in Otterbourne. However, as we raised within our Regulation 18 representations, these evidence documents show significant inconsistencies with how the sites were assessed. **The inconsistencies raised have at no point been addressed or a response provided on how such conclusions were reached, something we would very much welcome.**

In solely reviewing the two sites OT03 (Land off Main Road) and OT08 (Land off Cranbourne Drive) there are notable concerns on the validity of this assessment process and the robustness of the supporting SHELAA which has underpinned the initial assessment of sites. Whilst both sites were concluded to be deliverable/developable, these inconsistencies highlight how the data provided to the Parish Council and feeding into future assessments could have been misinterpreted. Whilst these issues were raised through the Regulation 18 Local Plan consultation, they have not been addressed, and rather than respond to these inconsistencies, the 2023 SHLAA remains unchanged and therefore the same unsubstantiated judgements are continuing to feed into future decisions.

Suites 9 & 10
Bristol North Baths
Gloucester Road
Bristol
BS7 8BN

We would request that you refer back to Barwood Land's detailed representations to the Regulation 18 Local Plan consultation in this regard but for clarity, we again highlight the inconsistencies regarding how landscape, highways, and heritage were considered and reiterated in the assessment tables provided.

For example, Land off Cranbourne Drive, which is both physically and visually contained is recorded as "amber" for landscape under the SHELAA appraisal, whereas Land east of Main Road (the current draft allocation) is recorded "green". However, as we have highlighted Land off Main Road would arguably have a significantly higher impact in landscape terms, particularly given the potential impact on views (adverse effects on receptors of higher sensitivity) available from people walking the public right of way crossing through the site and also as evidenced in previous applications on this site which have been refused for reasons including landscape impact. **This should have been flagged as a potential significant constraint and it was not, why is this the case?**

Regarding heritage impact, Land east of Main Road is recorded as "green" despite the number of listed buildings in proximity, including Otterbourne House directly adjacent the site. Again, when considering Archaeology, Land east of Main Road has been recorded as "green", despite the fact the line of a Roman Road directly bisects the site. Whilst our own assessments would suggest this unlikely to result in the undeliverability of the site, it would appear unjustifiable at this point to consider there to be no potential archaeology constraints. This should be recorded as "amber" in the SHELAA.

Finally, in considering health and wellbeing the assessment records OT03 as being of minor benefit; although in reviewing the criteria behind this score it is unclear what this minor benefit relates to; how the weighting has been attributed is unclear, and our own view based on the justification would record OT03 as negligible (0?) in this regard. **These inconsistencies in the evidence have not been addressed, and we have not been provided an answer as to why these sites have been evaluated as they have, which we gratefully request.**

We note a reference in the response provided regarding the location of Land of Cranbourne Drive and proximity to the motorway potentially impacting health and wellbeing. Whilst we acknowledge the proximity of the M3, all initial assessments have concluded that appropriate indoor and outdoor noise levels can be achieved, based on the existing and proposed enhancements to the significant areas of existing woodland planting at the site and proposed other mitigation opportunities. The site also offers numerous potential health benefits including the significant areas of open space for new and existing residents of Otterbourne, the gifting of the woodland to the Parish council for recreational use, and now the provision of land to potentially deliver a much need health facility for the community. We would highlight the importance of the appropriate consideration of benefits such as this as acknowledged in para 98 of the draft NPPF updates where "*Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for*

development". There does not appear to be any consistency in reviewing the balance of opportunities and constraints associated with these sites.

It is clearly not just Barwood Land who have concerns regarding how the previous representations have been responded to in the next stage of the Local Plan as evident from the following responses highlighted in the minutes taken of the 19th August Cabinet Meeting for example:

- Speaker 6 - voiced concerns about the lack of feedback on representations made during the Regulation 18 consultation, particularly regarding errors in assessments and outcomes and questioned the legality of proceeding with the plan without addressing these inaccuracies and called for a review to ensure the process remained lawful.
- Speaker 7- Criticised the Council for not adequately addressing errors in the Integrated Impact Assessment and failing to provide comprehensive feedback to representations made during the Regulation 18 stage.
- Speaker 14 - Stressed the necessity of thoroughly reviewing and responding to all comments from the Regulation 18 consultation before the plan's submission.
- Speaker 19 – Confirmed whilst the Conservative group supported the accelerated timeline for the Local Plan to meet future housing needs, they raised concerns about the process and consideration of public feedback. They also questioned the accuracy and transparency of housing allocations and urged the administration to provide a clear and comprehensive response to all Regulation 18 feedback online to ensure that residents' concerns are addressed.

As we have highlighted throughout this letter, the response received from the policy team does not answer any of the specific queries set out in Barwood Land's representations or subsequent e-mails or provide any further reassurances on the assessment process. Barwood Land has clearly objected to Policy OT1 and this objection has for whatever reason been missed out of the summary assessment. This point needs to be appropriately addressed before the Plan is taken to public consultation. Whilst we will be providing detailed representations to the Regulation 19 consultation; we would gratefully request answers to the questions raised which relate to the validity of the assessment of alternative sites and evidence base of the Local Plan going forward.

We look forward to hearing from you.

Yours faithfully



Helen Ross
Associate Director
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APPENDIX 2

E-mail sent on behalf of Barwood Land to Winchester
Policy Team following publication of their Reg 18
Summary of Responses (31/07/2024)

Helen Ross

From: Helen Ross
Sent: 31 July 2024 07:26
To: Adrian Fox
Cc: Planning Policy
Subject: Winchester Local Plan Evidence

Dear Adrian,

We write with regard to the information recently published on the Local Plan (Reg 19) pages of the Council's website, which was reported to Scrutiny Committee yesterday (29th July).

We have concerns regarding the robustness of some of the reporting. For example, the representations we submitted to Policy OT1 are missing from the summary of comments to this Policy and as such, our concerns have not been properly considered by the Council or adequately reported to Members. We request that this is rectified ahead of the Cabinet meeting on 16th September (if this goes forward) and I would be grateful if you could confirm this to me in writing as a matter of urgency (acknowledging the timetable for progressing the Local Plan is likely to now change given the proposed revisions to the NPPF and the Standard Method).

For completeness, I set out below our main concerns with the reporting.

Summary of Representations to Policy OT1

As outlined, we are concerned with regards to the transparency of the supporting evidence. Firstly, in reviewing the OT1 reps, the summary states: 35 – Support, 7 - Neither support nor object, 10 – Object. However, the comments included in the document are for: 9 objecting to the policy, 6 neither supporting or objecting and 6 in support. Who are these 35 responders who support the policy? More significantly, why is a summary of Barwood Land's representations missing from this document? With the omission of a summary of these comments, we have no response to the valid questions we raised regarding the ability of the site (Land off Main Rd) to deliver the allocated housing. It is misleading to present this evidence to Councillors without such comments and we would ask you respond as to why they were not included?

For your benefit we again highlight those key concerns below:

- The developable area of the draft allocation (when subtracting the land designated to the community for open space) is not large enough to deliver the allocated 55 dwellings. The masterplan submitted for the previous application shows only c. 33 dwellings in the developable area as allocated within the Plan. As such, either an extremely dense development would result or further encroachment on adjacent open space. Whilst it is noted that the northern parcel is c. 1.69ha, this includes a copse of trees and hedgerow which will need to be retained. Gladman's own planning application in 2019 considered the actual developable area of this parcel to be nearer 1.1ha which would lead to a very dense development of c. 50 dwellings per hectare, more akin to a city centre scheme than a suburban housing development. We strongly feel that this point is being completely ignored and we'd appreciate a robust response to this being added to the OT1 representations summary given it was a key question within our reps to this Policy.
- The previously refused applications on the Gladman site highlights landscape and access concerns, including an unacceptable impact on the local landscape character, and the setting of the village.
- Unlike 'land at Cranbourne Drive', there is no strong defensible boundary to future development. Concern has been raised that this could lead to further development creep into the open countryside.
- There is no evidence of Gladman's ability to gift the remaining land east of the public right of way to the Parish Council as open space.
- The Gladman site is well-used, publicly accessible land and development here would impact on the currently unspoilt views from the public footpath.

- Safety concerns have previously been raised regarding the addition of a further arm off the Coles Mead roundabout required for access to the site.
- The distance between the school and the site would be less likely to encourage walking to school and could therefore increase traffic at peak times.
- There could be potential impacts on listed buildings in proximity including (Old Parsonage or Otterbourne House).
- There are ecological concerns regarding the tree area that is subject to a Tree Preservation Order which would be impacted by implementing the access.

Otterbourne Omission Sites

As you will hopefully be aware from our last e-mail regarding the consultation we held across Otterbourne Parish, we (as with a large number in the community) have strong concerns regarding the allocation being progressed in Otterbourne – OT1. Unfortunately, these concerns have only increased reviewing the Council’s Otterbourne Omission Sites document, which highlight issues over the robustness of the supporting site assessment and review of alternative sites. We maintain that these concerns need to be addressed now, rather than simply leaving them to be picked apart at examination.

The Otterbourne omission sites document does not provide a clear review of how those alternative sites were considered or even set out the key issues (opportunities or constraints) of any of the sites, it simply provides a summary of the chosen allocation, largely relying on the statement *“this was the preferred site of the Parish Council”*. This is despite the fact that we have clearly demonstrated in the representations put forward and our own recent community consultation that this is not the preferred site of the local community. This is even set out in the OT1 reps document with one of the responders highlighting *“In the recent survey of the Community for this SHELAA local plan, this site was again proved to be very unpopular - 23 voted for and 112 against”*. Given the concerns we have raised, it is clearly not a robust approach to simply rely on the fact that the site was once put forward by the Parish Council. This is especially pertinent, as when they put the site forward, they requested further discussion with the Council which never took place, highlighted their own concerns with the proposed allocation and stated they were still considering other sites (as evidenced on Page 76 of the Council’s ‘Development Strategy and Sites Proposed Submission 2024’ document).

As we have previously highlighted, allocating this site above a more suitable alternative, such as land off Cranbourne Drive (preferred in both the Parish Council’s and our own consultation) is a missed opportunity to deliver a site for the village which provides significantly more public benefits. This includes amongst them land for a new community/ health facility (demand for which has been clearly highlighted by the ICB who have evidenced the already oversubscribed GP services in this area and concerns over further increased demand not being appropriately addressed through the local plan). This is also the case with education – neither of which will be addressed through the current allocation.

We cannot see any detail on how the above points have been considered or addressed. The evidence available simply does not support the proposed allocation taken forward or show a robust assessment of alternative sites; and will therefore be highly challengeable at examination. As set out above if you can let us know why a summary of Barwood Land’s Representations was not included that would be appreciated and we would hope noting the numerous points raised through the scrutiny of the documents published; revised versions are circulated to address key concerns.

Kind Regards,

Helen Ross
Associate Director



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APPENDIX 3

Otterbourne Planning Committee Minutes (08/03/2022)

**MINUTES OF OTTERBOURNE PARISH HCOUNCIL
PLANNING COMMITTEE MEETING 8 MARCH 2022 AT 7.30 PM
IN THE CHAMBERLAYNE SUITE, OTTERBOURNE VILLAGE HALL**

Present: Cllrs M Smith (Chair); Gilbert; Stansbury; Moody; Lansdown-Bridge.

In attendance: County and District Cllr J Warwick; District Cllr H Williams; 13 Parishioners, Clerk.

1. **Declaration of Interest:** Cllrs Lansdown-Bridge (site OT03) and Moody (site OT08)
2. **Apologies for Absence:** Cllrs Reed; King; J Smith. District Cllr B Laming
- 3 **To discuss the Strategic Housing and Economic Land Availability Assessment (SHELAA) sites for potential development within Otterbourne and to receive feedback from the village consultation.**

The Chairman addressed the meeting. The Parish Council was challenging WCC regarding the ongoing Local Plan. A letter, collectively signed by all parishes within the Ward, had been sent to highlight the number of potential development sites and cumulative housing numbers that had come forward within the Ward; also, that the timeline for consultation with parishes had significantly slipped before completion of the draft Regulation 18 Local Plan by August/September 2022. Otterbourne was also challenging the Settlement Hierarchy that formed part of the evidence base for the development strategy, regarding inconsistency in assessing some village settlements separately, eg Otterbourne and Otterbourne Hill, whilst not applying the methodology equally to all other villages with multiple settlements. A response had also been sent updating the facilities within Otterbourne and Otterbourne Hill that would be used towards the hierarchy.

The Chairman gave report about an online meeting 8 March with Adrian Fox, WCC Head of Strategic Planning, and Jill Lee, WCC Principal Planning Officer. County and District Cllr Jan Warwick and the Clerk were also in attendance. WCC was working towards 700 dwellings/year, but there was some concern that this figure could increase slightly; it had a duty to co-operate with the Partnership for South Hampshire (PuSH) regarding housing numbers; it would be taking into account housing numbers already committed under the current Local Plan; it would look at brownfield sites first, but there would be some need for greenfield sites; and it would make an allowance within its figures for ‘windfall’ sites ie those unexpectedly coming forward within the settlement boundary. However, sites had to be deliverable, landowners had to be willing to develop within the 2039 timeframe, and sites identified or dismissed had to be able to stand up to challenge by developers at the Local Plan inspection stage and through to the next Local Plan. WCC would be meeting with the Winchester Town Forum and the parishes bordering the city as well as individual parishes around the district to discuss the SHELAA sites. The next stage would then be assessment and testing through evidence (transport, landscape, viability) before the draft Regulation 18 Local Plan. The key strategy for development would be sustainability and Otterbourne, along with South Wonston and Sutton Scotney were considered sustainable due to their services and facilities. In the last Local Plan, Otterbourne had not been required to meet any housing target, but some small ‘windfall’ development had taken place within the village, such as the former ‘Old Deeds’ site. The housing

figure being tested for Otterbourne to meet towards the new Local Plan was 50-60 dwellings, ie around 10% of the current, total village, household number. WCC appreciated the early consultation with the village, the support of local knowledge, the feedback from residents and the Parish Council and progression to work collaboratively towards identifying a suitable site(s) to meet the housing target identified.

The Chairman briefly outlined the history of development within Otterbourne. Post 1996 the Parish Council had prepared papers assessing seven potential development sites within the village. Three sites: Sparrowgrove, Coles Mede and Cranbourne Drive had since been developed and the four remaining sites were amongst the current development options: OT03 Land east of Main Road; OT04 Park Farm on Kiln Lane; OT05 Land off Waterworks Road; OT08 Land west of Cranbourne Drive. To these had been added: OT01 Land at Meadowside and Dean Croft on Poles Lane; OT02 Highbridge Farm on Highbridge Road; OT06 Land at 'Roselea' on Highbridge Road; OT09 Land north of Kiln Lane. The decision to determine areas for development to meet future housing needs would be no easier today than in 1996, but the community input from the village survey 'Implications for Future Planning within Otterbourne', the feedback from the information sessions and the Planning Committee meeting would be helpful in shaping the current decision.

The Chairman reported on the feedback from the village survey – see Annex B. Some parishioners had given a huge amount of considered thought to identify positives and negatives for each site; others had been 'closed' to the option of development; and others (only recorded by area and not as individuals) appeared, understandably, to display 'not the one closest to me' as response. The response rate was 23% overall for the village and a breakdown of response rates per area had also been made showing stronger response rates from residents living near to some of the sites. Overall, and given that a 'no development' was not likely to be an option, small scale development was seen as the least unacceptable, whether a small site or part of a larger site. Additional traffic was the major issue raised by the majority of residents and perhaps why sites at the edges of the village, rather than those close to the centre may have been more preferred, such as: 'Meadowlands' and 'Dean Croft' site on Poles Lane, 'Roselea' on Highbridge Road, and Land off Waterworks Road. The village feedback would be put forward within the Parish Council's discussion, with WCC and with neighbouring parishes. However, all sites carried a number of constraints and had to be sustainable which would strongly influence any decision. The sites were then discussed in numerical order – see Annex A.

4. Open Session for Parishioners.

A number of matters were raised by Parishioners attending.

Land off Waterworks Road: concern about highway access, including the unsuitability of Waterworks Road for more traffic and that Sparrowgrove was already heavily used by Southern Water, Clancy Docwra and the South Central Ambulance Service. Concern about the site access and land levels was also raised, together with overload of the sewer infrastructure and its effect on dwellings further down the village.

Land west of Cranbourne Drive: concern that a constraint had not been recorded for the land being within a Flood Zone with request that this should be corrected if going forward.

A parishioner commented that if sites were chosen on the edge of the village it could lead to infill in future years and expansion of the village boundary. The problems of both noise and air pollution for the Cranbourne Drive site, being so close to the M3, should not be underestimated regarding the impact on physical health and mental well-being. The most likely type of accommodation for the site would be flats and this was not what had come forward as needed for the village from the last village survey in 2012. The demographic of the village was an older population, largely due to the unaffordability of the current housing stock, and the need was for small scale developments of 2 and 3 bedroom houses, suitable for young families who would also support the local school. The same sized housing would be suitable for older people who wished to remain in the village to downsize, freeing up larger houses again. The matter of 'brownfield' site development was raised. Three sites had been identified in the village and WCC would be asked whether their potential dwelling numbers could be included within the 50-60 figure for Otterbourne. Cllr Warwick pointed out that the timing for development of these sites could be critical as to whether they could be counted before Regulation 18 in August/September. Concern was noted about the proximity of the Compton & Shawford sites on Poles Lane for commercial development and significant housing numbers. The Chairman advised that WCC had been asked at the meeting 8 March to keep Otterbourne informed about the sites.

5. Summary and to agree way forward

Two information sessions for the village had taken place and a consultation with feedback submitted by 23% of the village, followed by a Planning Committee meeting with opportunity for residents to address Council in person. A meeting with the Head of WCC Strategic Planning and Principal Planning Officer had provided expected housing target of 50-60 dwellings and insight that sustainability would be a key issue. Councillors agreed that they would like to consider the input received and reassess the sites, putting forward their preferred three options to take forward for the Parish Council meeting 15 March 2022 before further discussions with WCC due by end of March.

Meeting closed 9.20 pm

Annex A – Individual Site Assessment

Annex B – Analysis of Village Responses

IMPLICATIONS FOR FUTURE PLANNING WITHIN OTTERBOURNE – INDIVIDUAL SITE ASSESSMENT

SITE	HOUSES	POSITIVES	NEGATIVES
<p>Land at Meadowside and Dean Croft, Poles Lane</p> <p>(OT01)</p> <p>5 x Constraints</p> <p>Village scored 1st</p> <p>OPC scored 4th</p>	<p>36</p>	<p>Reasonable access to Poles Lane, but is on a bend.</p> <p>Within an area of existing housing.</p> <p>Some impact on school.</p> <p>Low impact on most village residents.</p> <p>Low traffic impact on the village.</p>	<p>Fairly high number of constraints.</p> <p>Distance from local amenities and at far end of the village</p> <p>Pedestrian infrastructure not established at present.</p> <p>An “encourager” to larger, adjacent C&S developments.</p> <p>Size of site – potentially fewer affordable homes as small development could prioritise price over mix of home types.</p> <p>Low number of dwellings with decreased likelihood of additional new village amenities.</p> <p>Land subject to flooding.</p> <p>Second site needed for housing target.</p>
<p>Highbridge Farm, Highbridge Road</p> <p>(OT02)</p> <p>7 x Constraints</p> <p>Village scored 4th</p> <p>OPC scored 8th</p>	<p>181</p>	<p>Should be some affordable housing included.</p> <p>Likely increase in school age children, but see negatives.</p> <p>Minimal impact on residents.</p> <p>Greater than needed for village housing target.</p> <p>Potential new amenities needed to cater for numbers: parks, doctors etc</p>	<p>High number of constraints.</p> <p>Separated from local amenities/community.</p> <p>Large development with environmental impact on river/flood plain.</p> <p>Unlikely to use Otterbourne school.</p> <p>Lack of pedestrian facilities.</p> <p>Loss of buffer between EBC, OPC, CCPC, etc</p> <p>Insufficient road and transport infrastructure esp Allbrook Hill & rail bridge.</p> <p>More part of Colden Common/Allbrook community.</p> <p>Site number far exceeds housing target.</p>

<p>Land to East of Main Road</p> <p>(OT03) 3 x Constraints Village scored 7th OPC scored 3rd</p>	<p>106</p>	<p>Low number of constraints. Balances out the village ribbon development. Viable access (spur from roundabout) from Main Road. Well screened, limited impact on existing residents. Potential mix of home types and affordable/market value homes. Retention of Public RoW (potential reroute). Potential for additional amenities eg. Play area. Ease of access to existing village amenities. Long term increase in children of school age. All of village housing requirements met from a single site. Part site could be potential for 1/3 numbers.</p>	<p>Greenfield site, used by residents to access countryside. Potential traffic issues with access from/to Main Road. Site drainage. Natural walkway for community. Impact on existing local services and infrastructure. Quite a large site at almost double housing target figure. Roman road bisecting site.</p>
<p>Park Farm, Kiln Lane</p> <p>(OT04) 2 x Constraints Village scored 6th OPC scored 5th</p>	<p>68</p>	<p>Low number of constraints. Well screened but within village community and beneficial to local facilities. Potential for new amenities/allotments for residents. Potential mix of home types and affordable/market value homes. Long term increase in children of school age. Site currently inaccessible to the public i.e. no loss of 'open' countryside walks. Land not currently accessible for public use. Part site could be potential or whole site giving target housing figure.</p>	<p>Access onto Kiln Lane a concern as current access poor with a new wide access through treeline required. Increase in traffic on narrow, winding lane. No current pedestrian footpath. Site drainage. Impact on existing local services infrastructure (drainage etc).</p>

<p>Land off Waterworks Road</p> <p>(OT05) 4 x Constraints Village scored 3rd OPC scored 1st</p>	<p>24</p>	<p>Small development within existing housing. Least impact on village services and infrastructure given the small number of housing allocated. Inclusive within the village. Well screened, limited impact on existing residents. Site currently inaccessible to the public. Potential for some affordable homes. Benefit of increase in children of school age. Land not currently accessible for public use.</p>	<p>Already busy with traffic along Sparrowgrove due to SW site users, Clancy, NHS. Waterworks Road privately owned by SW and not highly suited to traffic. Potential impact on environment – woodland copse. Size of site - potentially fewer affordable homes as small development could prioritise price over mix of home types. Low number of dwellings with decreased likelihood of additional new village amenities. Access to site and land levels not ideal. Second site needed to make housing target.</p>
<p>Land at Roselea, Highbridge Road</p> <p>(OT06) 5 x Constraints Village scored 2nd OPC scored 6th</p>	<p>41</p>	<p>Minimal impact on village residents Potential for mixed housing types. Land not currently accessible for public use.</p>	<p>Fairly high number of constraints. Away from local amenities. Access from site onto Highbridge Road not ideal. Not part of village community. Unlikely to utilise Otterbourne school. Lack of pedestrian facilities. Countryside development. Insufficient current road and transport infrastructure esp. for Allbrook Hill & rail bridge More part of Colden Common/Allbrook community. Size of site - potentially fewer affordable homes as small development could prioritise price over mix of home types.</p>

<p>Land to West of Cranbourne Drive</p> <p>(OT08) 6 x Constraints Village scored 5th OPC scored 2nd</p>	<p>99</p>	<p>Extension of existing development. Reasonable access via ‘kickabout’ Increase in school age children likely. Within village community and beneficial to local facilities. Potential affordable/market value housing. Minimal road infrastructure update required. Potential for part development of the site. Potential to create linking footpath to Sponder’s Mede and village hall. Land not currently accessible for public use.</p>	<p>High number of Constraints. Potential traffic issues getting out on to Main Road, esp at school times. Houses very close to M3 with impact of noise and air pollution on physical and mental health. Most likely to be flats and not necessarily with children. Concentration of properties in one area with impact on existing residents. Existing services infrastructure (drainage etc) impacted for village. Flood zone. Larger site than needed to meet housing target, but part site could easily be possible.</p>
<p>Land adjacent Dell Copse, Kiln Lane</p> <p>(OT09) 5 x Constraints Village scored 8th OPC scored 7th</p>	<p>185</p>	<p>Access currently exists onto Kiln Lane. Potential for part site to be developed with linking footpaths to Footpath 4. Far exceeds housing target. New amenities required to cater for numbers – parks, doctors etc. Long term contribution to school numbers. Mixed housing types possible due to numbers, incl affordable homes.</p>	<p>High number of Constraints. Large development with significant impact on the village. Inadequate road infrastructure for access from/to Kiln Lane as narrow, winding lane. High impact of traffic on existing limited road infrastructure in village. Impact on existing local services infrastructure (drainage etc) for village. Public footpath would need diverting. Countryside development. Site drainage.</p>

IMPLICATIONS FOR FUTURE PLANNING WITHIN OTTERBOURNE

RESPONSES RECEIVED FROM THE VILLAGE

The Parish Council delivered 621 newsletters with forms. 145 responses were received = 23% response rate overall.

Not all respondents scored a FOR or AGAINST for every site and some respondents just submitted comments.

SITE	'FOR'	'AGAINST'	Site name with potential number of dwellings in brackets
OT01	87	44	Land at 'Meadowside' and 'Dean Croft' on Poles Lane (36)
OT06	72	53	Land at 'Roselea' on Highbridge Road (41)
OT05	72	62	Land off Waterworks Road (24)
OT02	59	65	Highbridge Farm on Highbridge Rd (181)
OT08	53	79	Land west of Cranbourne Drive (99)
OT04	48	85	'Park Farm' on Kiln Lane (68)
OT03	23	112	Land east of Main Road (106)
OT09	14	119	Land off Kiln Lane (185)

COMMENTS MADE ON THE RESPONSE FORMS

After entering all of the FOR/AGAINST responses, the comments were then divided into six overall reasons as being consistently mentioned. Many residents gave multiple comments and all were recorded and all scored equally.

REASON 1 30 Comments recorded.

Opposed to any development at all or against large scale sites. Some comments included larger sites could be considered, but only if part of the site was utilised with reduced housing numbers.

REASON 2 36 Comments recorded.

In favour of development or accepting that some development will/must take place. Particularly if this is smaller sized, affordable housing for young people, older people, and with accompanying infrastructure improvements. Some comments included that a reasonable figure would be a 10% increase on current village numbers.

REASON 3 57 Comments recorded.

Concern about highways, access to the sites and the amount of traffic. Particularly in relation to traffic increase on Main Road and its impact on noise, air quality and pedestrians; access off Kiln Lane being a narrow, country lane with no footpath; Cranbourne Drive as a residential area and walking route to the school; Waterworks Road as a residential, private road.

REASON 4 35 Comments recorded.

Concern about infrastructure overload. Particularly mentioning the sewer capacity, school capacity, road deterioration, flood plain capability, water resources and run-off into the Itchen.

REASON 5 35 Comments recorded.

Concern about loss of countryside, habitat for wildlife, rural village character, open space for recreation and unspoilt footpaths.

REASON 6 18 Comments recorded.

Concern about development not being too far from the village, too close to the M3 for reasons of noise and air quality, without footpath access, within walking distance of the village amenities, being in keeping with the Village Design Statement for build.

RESPONSE RATE BY LOCATION AND NET SCORES BY LOCATION AND SITE

Location	Response Rate	Net Score							
		OT01	OT02	OT03	OT04	OT05	OT06	OT08	OT09
Greenacres Drive / Meadowcroft Close	39%	7	-9	-14	3	9	-1	-7	-21
Oakwood Ave / Oakwood Close	27%	6	0	-10	1	0	3	0	-9
Oakwood House / Lodge	26%	0	-2	-2	-2	-6	2	-2	-4
Cranbury Close / Coles Mead / Old Parsonage	10%	2	-1	-5	-6	2	0	-5	-6
Cranbourne Drive	32%	7	-1	-13	-5	1	6	-20	-14
Main Road / Brooklyn Close / Brooklyn Court	24%	7	5	-17	-13	10	4	3	-17
Sparrowgrove / Regent Close / Richmond Park / Waterworks Road	23%	6	5	-10	-3	-15	5	4	-6
Poles Lane / Norlands Drive / Copse Close / Bourne Close / Beyond M3 bridge	19%	-5	-2	-9	-3	0	-1	-5	-10
Kiln Lane / Highbridge Road	47%	3	1	-3	-9	1	-1	4	-8
Boyatt Lane / Red Lane/Otterbourne Hill / Chapel Lane / Park Lane / Pitmore Road/Grange Dr	12%	10	-2	-6	0	8	2	2	-10
Total	23%	43	-6	-89	-37	10	19	-26	-105

Site number and name for reference

OT01	Land at 'Meadowside' and 'Dean Croft' on Poles Lane
OT02	Highbridge Farm on Highbridge Rd
OT03	Land east of Main Road
OT04	'Park Farm' on Kiln Lane
OT05	Land off Waterworks Road
OT06	Land at 'Roselea' on Highbridge Road
OT08	Land west of Cranbourne Drive
OT09	Land off Kiln Lane

APPENDIX 4

Letter sent on behalf of Barwood Land to Winchester Policy Team to provide feedback from their Consultation regarding Land off Cranbourne Drive (24/06/2024)

Date 24/06/2024

Our Ref:735

helen@grassroots-planning.co.uk

0117 930 0413 / 07841 026816

Mr Adrian Fox
Planning Policy Team
Winchester City Council
City Offices
Colebrook Street
Winchester
SO23 9LJ

Dear Mr Fox,

Re: Emerging Local Plan Allocation for Otterbourne - Public Consultation Results

On behalf of our client, Barwood Land we are writing to the Policy Team at Winchester City Council (WCC) to highlight the findings of a recent online public consultation event, which related to development opportunities in Otterbourne. The purpose of this event was to establish the local community's thoughts regarding draft allocation OT01 and whether in fact the community might prefer to give support to an alternative site, known as 'Land off Cranbourne Drive' (SHELAA ref: OT08).

We set out the context for this consultation below as well as the methodology and results.

Whilst we appreciate that the Council has previously taken the stance of not discussing omission sites, we consider that the below makes compelling reading and provides greater evidence to support the allocation of a different site in Otterbourne due to the significant and wide reaching community benefits it can offer. As such, we would greatly appreciate the opportunity to discuss this site with officers.

Context

As you are aware, under the emerging Regulation 18 version of the Local Plan, Otterbourne village is required to take c. 77 dwellings and in order to meet some of this identified need, the Council has sought to allocate 'Land east of Main Road' for c. 55 dwellings (draft Policy OT1).

As raised in our representations to this plan, we have some concerns regarding the ability of this site to deliver the level of housing required (see Appendix 1), as well as the limitations of this site to bring benefits to the village. Conversely, Cranbury Estate, whom you may also know as the Chamberlayne-Macdonald family who live locally, own land within the village which they believe can deliver the levels of housing required alongside real community benefits for Otterbourne.

The Estate wishes to leave a positive legacy within the village which really benefits the local community with potential to deliver a sustainable, vibrant, and resilient development. To facilitate this aspiration, Cranbury Estates has entered into a partnership with Barwood Land and together they have produced a masterplan for the site which seeks to provide a range of new homes, retirement living opportunities,

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safeguarded land for a new health / community facility and significant areas of open space. The details of the site and the development proposals are set out in Appendix 2 and 3 of this letter.

Cranbury Estates are active in the local community and were conscious that a number of residents were unaware of the draft Local Plan and its implications for the village. In addition, both Barwood Land and the Estate were keen to show what kind of scheme could be offered as an alternative for the village at land off Cranbourne Drive. As such, a decision was taken to hold an online public consultation event to inform residents of the Local Plan proposals and seek their views on the development site options.

Consultation Method and Results Summary

The consultation took place between 9th May and 10th June 2024. To advertise the consultation, we sent letters directly to the 684 homes and businesses in the parish of Otterbourne, as well as to the Parish Council. Whilst the consultation has finished, the website remains live, and we welcome the Policy Team to review this for further updated details on the proposed scheme: <https://www.landoffcranbournedrive.uk/>.

The consultation ran for just over 4 weeks and over that period the site was visited 1,412 times. In total we had 41 responses to the consultation and as opposed to seeing any consistent support for the draft local plan allocation, of those who responded 51% confirmed they had concerns regarding the proposed allocation at Land off Main Road, with just 22% appearing to support the allocation and the remainder either neutral or focussing their response specifically on Cranbourne Drive.

The main concerns and comments raised to the draft allocation were:

- Area is publicly accessible land regularly used by hikers / dog walkers / runners. The site was vital during Covid.
- Area seems very small to accommodate so much housing / cramped / concern regarding density.
- The proposal has been rejected twice already. The reasons for refusal still stand.
- Land east of Main Road was “the least preferred” of all options in the village survey.
- The development offers minimal benefit to the village and only provides housing and no additional amenities.
- The site is next to a walkable area of local nature and beauty.
- Concern that housing development will extend beyond what is currently stated in the Local Plan.
- Concern over another direct access onto Main Road.
- General concerns raised regarding impact on services, school capacity, drainage capacity and increased levels of traffic and congestion in the village which will be true for any new development of this scale.

In contrast 44% of those responding to the consultation supported development proposals at Land off Cranbourne Drive, with just 29% objecting and 17% leaving a neutral response and / or voicing concerns with the allocation of any development in Otterbourne. As is well understood, it is often those who oppose development that are more likely to respond to a consultation such as this, so it is very positive to see this level of support.

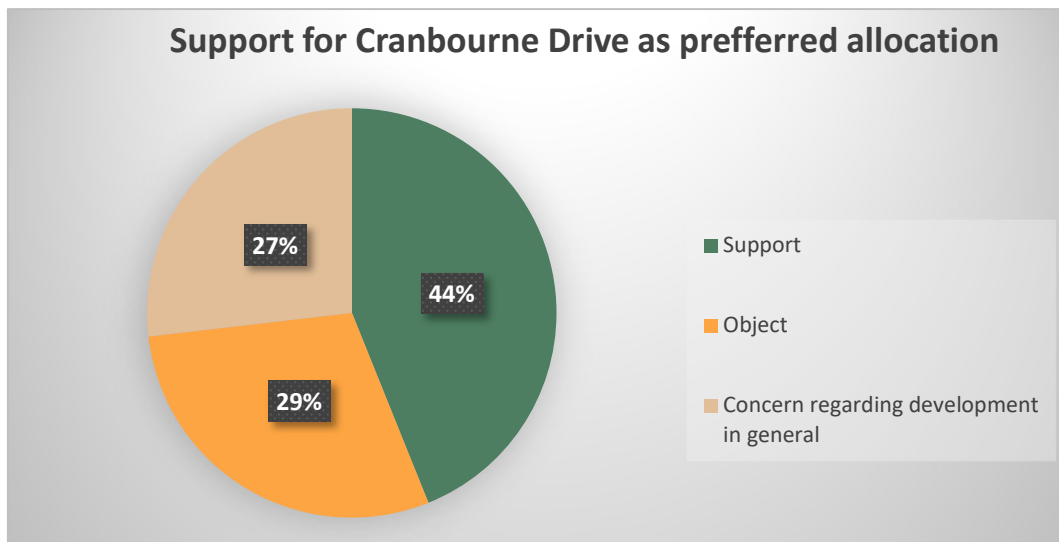


Figure 1. Results of Barwood Land consultation

Those responding to the consultation highlighted the following benefits in relation to the potential allocation of Land off Cranbourne Drive:

- Larger area of land proposed, less cramped with the ability to deliver further benefits and local infrastructure.
- Bringing private land into beneficial use.
- The provision of land to deliver a community / health facility.
- Desire for a GP surgery in the village.
- The gifting of woodland could be an attractive, generous community benefit. It can be used both for walking and wildlife preservation and could enable a number of community based projects to be realised.
- The potential to deliver a care home for the elderly / dementia sufferers.
- The delivery of safe pedestrian / cycling access to Otterbourne Primary School, away from the busy Main Road.
- Increased provision of affordable housing.
- Provision of a play area / trim trail. No such facility this side of Otterbourne currently.

Of those responding to the questionnaire, 45% felt that a new GP surgery should be delivered on the land earmarked for a community building. As noted, Barwood Land are in discussions with the NHS Hampshire and Isle of Wight ICB to understand local need. We would also welcome discussion with the policy team regarding any wider need for community / health facilities in the area which this site could help to deliver and the potential for funding through the Infrastructure Delivery Plan.

In addition to the numerous positive comments received regarding Land off Cranbourne Drive, some respondents did raise concerns which largely related to highways and the proximity of the school and the noise implications of developing housing close to the motorway. These are factors have been carefully considered in the design process, to ensure appropriate mitigation is in place and are discussed in further detail below.

Highways

With regard to highways, transport consultants PJA were appointed to consider the access arrangements and confirm that a technical access solution is achievable on this site. The single access to the site is proposed off Cranbourne Drive (adjacent to no. 45) and early analysis confirms the access can be delivered with suitable visibility.

The proposed development is likely to result in a maximum of 50-60 vehicle movements per hour (two-way) during the AM and PM peak hours. Outside of these peak periods the vehicle movements generated from the proposed development will be significantly lower. Subject to the distribution of traffic (north/south) this is unlikely to be perceptible for most, representing a peak of one vehicle every 1-2 minutes on sections of Cranbourne Drive/Coles Mede.

Further, the provision of a community facility such as a GP surgery within Otterbourne would reduce the need for residents to travel further afield to access such amenities. Currently the nearest alternative provision is in Chandlers Ford, Twyford or Colden Common which would all require journeys to be undertaken away from the village, likely by car.

We would also comment that primary aged children on this site would be able to easily walk to school along largely traffic free paths. Conversely, the Gladman site would require children to travel greater distances and to cross Main Road. As such, more of these journeys are likely to be made by car. In Otterbourne in general, it is also acknowledged that a number of the children attending the school come from out of the area as there is a lack of young families in the village. Additional family housing within close proximity of the school should therefore also reduce the number of children attending out of catchment and reduce car journeys.

The site is highly accessible and benefits from various public transport links to areas nearby, with bus stops located north and south-bound, both within 150 metres of the site access. There are also three train stations within four kilometres of the site in Shawford, Eastleigh and Chandlers Ford.

Pedestrian and cycle linkages will be central to these proposals, linking up the existing Public Rights of Way (PRoW) and creating a circular walk around Otterbourne. There is also potential to improve the existing paths which connect this area to Shawford and the rail link opportunities available there. We would be pleased to share further technical transport work with the Council if required.

Proximity to Motorway / Noise

With regard to proximity to the M3 motorway, initial noise modelling suggests the site can be delivered to achieve acceptable internal and external noise levels subject to additional mitigation including the bolstering of the existing landscape buffer, provision of an acoustic barrier, building envelope mitigation and careful scheme design to ensure the orientation of the buildings will also reduce potential noise impact to gardens. It is considered that careful design may actually achieve noise betterment for existing residents. Again, we would be pleased to share this technical work with the Council.

Other comments

Some respondents questioned the need for care / assisted living / retirement accommodation. A key reason for suggesting this type of housing was based on comments by the Parish Council that older

persons wishing to remain in the village were unable to downsize due to a lack of suitable housing. This in turn is understood to be restricting the amount of family housing coming onto the market which is impacting the school. We also sought initial advice from CBRE who advised that there is considerable need within the local area for additional accommodation offering sliding scales of care support. However, this is something we would be pleased to discuss with the Council regarding specialised housing needs in the area.

Several comments suggested that there is a general need for new play facilities / a trim trail in the village. In this regard, we consider it important to highlight that the main play area for the village is to the east of Main Road, with little in the western half of the village. Allocating a site to the west of the village will therefore deliver a play facility for local children, negating the need for them to cross Main Road to gain access.

A number of respondents raised concerns regarding the capacity of the local primary school. We understand that there is existing capacity in the school. In discussion with the Parish Council, it was also apparent that a number of pupils come from outside of catchment as it is an excellent school and there are not enough children living within the village to fill the places. The site is adjacent to the primary school, and we would be pleased to discuss the provision of land to the school for ecological learning. This might free up land elsewhere within the school site should there be any requirement for future expansion / improvement.

There were also comments questioning impact on technical matters such as ecology and drainage. In response, we have sought to progress technical studies, including a full suite of ecology surveys and no significant issues have been identified. The masterplan as proposed is grounded in this technical work and is therefore deliverable and achievable.

It should also be acknowledged that we received pre-application advice on the site in September 2023 (Ref: 23/00991/PRE) which beyond conflict with the development plan, did not raise any substantive issues with the site.

Regulation 18 – Allocation Process

As you know, the Regulation 18 draft Local Plan includes Land off Main Road (promoted by Gladman) as the preferred housing allocation for Otterbourne, put forward by the Parish Council. However, as we have previously highlighted in representations to the Local Plan, the Parish Council's own consultation on proposed housing allocations, confirmed that of the 145 responses they received **77% of those responding were against the allocation of Land off Main Road (OT3)**. In comparison, 53 respondents (37%) were "For" Land off Cranbourne Drive (OT08), indicating this would be the preferred option, with over a third of those responding "For" the site (see Appendix 4). Only 16% supported Land off Main Road. It is concerning that the results of this survey, do not reflect what has been put forward to WCC.

The responses received to our own consultation reflect the above, with residents having raised serious concerns with the chosen allocation. In the words of some local residents: *"Land East of Main Road has twice been rejected by the community and was "the least preferred" of all options in the village survey advising the Winchester City councils SHEELA document. Despite these wishes the Otterbourne PC went against the community in recommending the site for the Local Plan"*.

We understand that, despite the above, the key reason the Parish Council put its support behind the Gladman scheme is that Gladman agreed to a reduced developable area and to gift some land to the Parish which would be retained as open space. The Parish Council therefore made a unilateral decision to disregard its own consultation. However, as we set out in Appendix 1, there are clear questions regarding the ability of the Gladman land to deliver the c. 55 dwellings whilst retaining these promised areas of public open space. We would therefore urge officers to interrogate this further, as in discussions with the Parish, they were of the view that the area of woodland within the site could be removed which would provide additional space for the housing. However, from an ecological perspective, this would not be acceptable. It is our view that for a scheme to deliver 55 dwellings on the area identified, a density of some 50 units per hectare would be required.

Our own consultation identifies a strong level of support for proposals at Land off Cranbourne Drive and the public benefits which could be delivered in progressing this site as the preferred allocation. Land off Main Road is unlikely to meet the housing need and the cited benefit of the proposal - that the remaining land would be gifted to the Parish Council - pales into insignificance when you note this land is already well-used by the public and when considering this against the number of direct benefits associated with the development of land off Cranbourne Drive. These include amongst them the provision of land for a community / health facility, the delivery of elderly persons accommodation, the gifting of 5ha of woodland and the delivery of 7 hectares of open space. As put by one of the responses *“The Cranbourne Drive proposal sounds just what the village seems to need to grow in a way to benefit us all”*.

Land off Cranbourne Drive will deliver a range of public benefits for the existing and future residents of Otterbourne which significantly outstrip that suggested by the delivery of Land east of Main Road, which is why we are continuing to strongly promote this site for allocation.

ASSETS ALLOCATION OPTION	LAND OFF MAIN ROAD (SOLELY RESIDENTIAL)	LAND OFF CRANBOURNE DRIVE (MIXED-USE SCHEME)
Delivering Otterbourne's allocated housing on one site		
Providing land to deliver a community facility (i.e. GP surgery, dentist, nursery or other community facility)		
Supporting an ageing population through provision of specialist accommodation		
Supporting those in need through the provision of Affordable Housing		
The provision of large areas of public open space (including wild meadow and parkland)		
Delivering a site with defensible boundaries which will not open the door for further future development		
Delivering a site well-linked to the local school		
Providing enhanced public rights of way linkages and the potential for a circular walk		
Potential to improve the existing connections between this area and Shawford Station		
Reducing carbon emission and mitigating the impact of climate change		
Protecting environmental assets		
Delivering a site with limited landscape impact		

KEY



HIGH BENEFIT



SOME BENEFIT



NO BENEFIT

Table 1. Table summarising the proposed benefits of Cranbourne Drive in comparison to Main Road

Conclusion

We appreciate all the work which is being undertaken by officers as part of the Local Plan process and wholly support the fact that officers have sought to work with Parish Councils to identify preferred sites.

However, in the case of Otterbourne, we have considerable concerns that the Preferred site identified by the Parish is not capable of being developed out as per the draft allocation due to the scale of the site and technical constraints which the Parish Council may not fully appreciate without the benefit of technical planning expertise. Indeed, the allocation could threaten existing valued areas of open space.

Further, our client and Cranbury Estates wish like to leave a positive legacy within the village which really benefits the local community and has the potential to deliver a sustainable, vibrant, and resilient development. As such, we feel that 'land off Cranbourne Drive' could be a real missed opportunity given the significant benefits it could bring.

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There is still opportunity to change the approach going forward and to allocate the site which offers the most benefits to the community, and which as evidenced by our own research and that undertaken by the Parish Council, is supported over and above the site currently being progressed for allocation. The evidence simply does not support the proposed allocation taken forward. Rather than going over these points in detail through the Local Plan examination, we would very much appreciate the opportunity to meet with the policy team before the plan is progressed to the next stage as this is an opportunity for local residents which should not be missed.

We look forward to hearing from you.

Yours faithfully



Helen Ross
Associate Director

Appendix 1 – Review of Land off Main Road

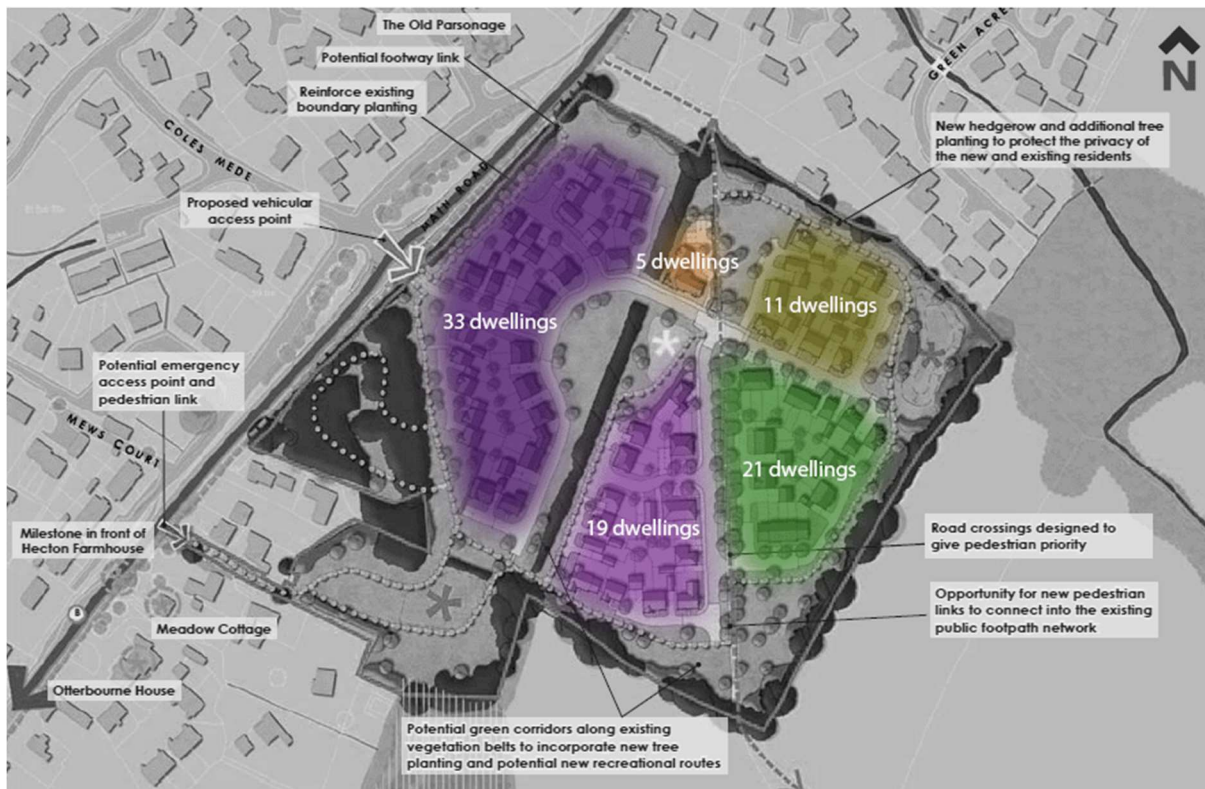


Figure 2. Previous Gladman proposal at Land off Main Rd (annotation added by Grass Roots)

Land east of Main Road (promoted by Gladman, part of Barratt David Wilson PLC) is currently proposed for a residential allocation of up to 55 dwellings in Winchester’s draft Local Plan. Planning permission has been refused on this land twice previously and an appeal withdrawn.

A high-level review of the site and the previous refusals by the Council highlight a series of constraints which impact the suitability of this site for allocation. These concerns are highlighted below and reiterate that the council should be reconsidering the proposed allocation for Otterbourne.

- The developable area of the draft allocation is unlikely to be large enough to deliver the allocated 55 dwellings. The masterplan submitted for the previous application shows only c. 33 dwellings in this area. As such, either an extremely dense development would result or further encroachment on adjacent open space.
- Excluding the copse of trees and hedgerow which will need to be retained, the northern parcel is c. 4.18 acres/ 1.69ha which could potentially accommodate a development of 55 dwellings at 32 dwellings per hectare. However, Gladman’s own planning application in 2019 considered the actual developable area of this parcel to be nearer 1.1ha which would lead to a very dense development of c. 50 dwellings per hectare. This would be more akin to a city centre scheme than a suburban housing development.
- Unlike Land at Cranbourne Drive, there is no strong defensible boundary to future development. Concern has been raised that this could lead to further development creep into the open countryside.

- There is no evidence of Gladman's ability to gift the remaining land east of the public right of way to the Parish Council as open space.
- The previously refused applications on the Gladman site highlights landscape and access concerns, including an unacceptable impact on the local landscape character, and the setting of the village.
- The Gladman site is well-used, publicly accessible land and development here would impact on the currently unspoilt views from the public footpath.
- Safety concerns have previously been raised regarding the addition of a further arm off the Coles Mead roundabout required for access to the site.
- The distance between the school and the site would be less likely to encourage walking to school and could therefore increase traffic at peak times.
- There could be potential impacts on listed buildings in proximity including (Old Parsonage or Otterbourne House).
- There are ecological concerns regarding the tree area that is subject to a Tree Preservation Order which would be impacted by implementing the access.

Appendix 2 - About Land off Cranbourne Drive

Land off Cranbourne Drive is private land located on the western edge of the village of Otterbourne adjacent to the settlement boundary. The land is physically and visually contained, bordered by significant tree coverage to the west (with the M3 motorway beyond this) and to the east (with the residential properties of Cranbourne Drive beyond this). The northern boundary goes up to the existing tree-line and further woodland borders the site to the south.

The site is well situated within walking distance to a variety of local facilities including the village hall, church, primary school, convenience store and pubs. The site also benefits from bus stops within c. 40m providing regular services to locations including Winchester, and Southampton. The nearest railway station of Shawford provides excellent access to Winchester and beyond.



Figure 3. Visualisation of Land off Cranbourne Drive proposal

An illustrative masterplan for the site is provided at Appendix 3 and demonstrates that the scheme can achieve the following:

- Delivery of Otterbourne's housing allocation on one site (up to 65 dwellings) including a mix of market and genuinely affordable homes to meet local need.
- A range of smaller, medium and larger homes which could assist downsizers, first time buyers / young families and growing families.
- Retirement living opportunities, addressing a growing need for elderly accommodation in the area, which may also assist older residents to remain living in the village. The site is level and within walking distance to local facilities making it ideal for care provision. This could be in the form of a care home, assisted living or over 60's housing provision, or a mix.
- Provision of land for a health or community facility. Discussions with the NHS Hampshire and Isle of Wight ICB are currently taking place to understand local need.

- Provision of biodiversity and green infrastructure enhancements that encourage access to, and learning about, the natural environment. This could include land for the adjacent primary school's natural sciences learning.
- Delivery of large areas of open space (nearly 7 hectares) including a wild meadow, play area and parkland.
- Improvement of footpath and cycle connections and enhance access to the wider countryside.
- Gifting of a substantial area of privately owned woodland (5.26 ha) to the south of the site to the Parish Council for public use, with the potential to deliver walking and cycle trails.
- Working with the community to deliver health benefits such as assisting with the necessary link to create a circular walk around Otterbourne.
- Improving pedestrian and cycle connectivity to Shawford Station.
- Enhancing boundary planting around perimeter, further screening existing residential properties.
- Provision of sustainable urban drainage systems (SUDS).
- Provision of further noise mitigation to significantly benefit both existing and future residents.

The site was assessed under the Council's SHELAA as "*deliverable/developable*" under reference OT08 and through the Integrated Impact Assessment 2022 which identified no significant constraints to development. This was reiterated to WCC through representations submitted by Barwood Land in response to the Regulation 18 Local Plan consultation. We should highlight that since the submission of those representations in December 2022 the masterplan for Land off Cranbourne Drive has evolved to introduce further public benefits including the land for a community building/ health facility and elderly persons accommodation.

Appendix 3 – Illustrative Masterplan



KEY

- Proposed Site Boundary (dotted line)
- Potential Site Access point (subject to detailed design)
- Residential Developable Area (1.5km² - 35dph)
- Proposed GP Surgery (3.4ha) indicative building size - 1200sqm, accommodating approximately 18 GP consulting rooms, pharmacy, minor ops.
- Proposed 70 Bedroom Care Home (2.6ha)
- Pedestrian Route through site
- Existing Pedestrian Routes
- Existing Bus Stop
- Potential Footpath routes and connections with permeable surfaces
- Existing trees and hedges retained
- Potential Landscaping and new tree planting
- Wildflower planting providing ecological enhancements
- Potential Afforestation areas providing opportunities for ecological enhancement
- New Area of Play
- Existing Badger sett

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Appendix 4 – Otterbourne Parish Council’s Consultation Results (taken from Parish Council Planning Minutes - 08/03/2022)

IMPLICATIONS FOR FUTURE PLANNING WITHIN OTTERBOURNE

RESPONSES RECEIVED FROM THE VILLAGE

The Parish Council delivered 621 newsletters with forms. 145 responses were received = 23% response rate overall.

Not all respondents scored a FOR or AGAINST for every site and some respondents just submitted comments.

SITE	'FOR'	'AGAINST'	Site name with potential number of dwellings in brackets
OT01	87	44	Land at 'Meadowside' and 'Dean Croft' on Poles Lane (36)
OT06	72	53	Land at 'Roselea' on Highbridge Road (41)
OT05	72	62	Land off Waterworks Road (24)
OT02	59	65	Highbridge Farm on Highbridge Rd (181)
OT08	53	79	Land west of Cranbourne Drive (99)
OT04	48	85	'Park Farm' on Kiln Lane (68)
OT03	23	112	Land east of Main Road (106)
OT09	14	119	Land off Kiln Lane (185)

Figure 4. Annex B Planning Minutes 08/03/2022



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