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10 October 2024

Our reference: MLP/FH-WCCReg19
Your reference: ANON-AQTS-3291-8

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]

Dear Sir / Madam

Winchester District Proposed Submission Local Plan Update 2020-2040: Regulation 19 Consultation August to October 2024 – Representation number ANON-AQTS-3291-8

Master Land & Planning Ltd is instructed by Foreman Homes (FH), who welcome the opportunity to comment on the Pre-Submission stage (Regulation 19) consultation of the Winchester District Local Plan 2020-2040.

Our client's interest relates to SHELAA Site Reference CU08 Land at Botley Road, Station Hill. The focus of these representations relates to your proposed housing requirement and spatial strategy, specifically how the PfSH broad area of search growth to the east of Botley should be defined and implemented as part of this Local Plan to support wider unmet needs and align with the governments objective to deliver more homes and deal with the acute housing crisis.

The policies in the NPPF (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage after 19 March 2024. References to the NPPF are therefore to the latest December 2023 version. The proposed 2024 reforms to the NPPF set out in the Governments consultation of July-September are however relevant and will be referred to where necessary.

Please find enclosed:

- Representations below with cross-references to the appropriate paragraphs, policies, topic papers and supporting evidence; and
- Associated evidence.

We look forward to being kept informed of your Local Plan.

Yours faithfully

Senior Planner

cc: Clients

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<i>Title of document:</i>	Proposed Submission Local Plan		
<i>Relevant chapter, policy, figure or paragraph:</i>	Introduction, paragraph 2.5 Local Development Scheme		
<i>Do you consider the supporting text and policy are:</i>	<i>Legally Compliant</i>	<i>Sound</i>	<i>Complies with the duty to co-operate</i>
	Yes	No	No

NPPF paragraph 22 sets out that *“Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.*

Paragraph 2.5 confirms that the Local Plan covers a period up to 2040, extended from the Reg 18 Plan which looked forward to 2039.

The Winchester Local Plan timetable as published on the website¹ expects submission of the Local Plan between October to December 2024, and adoption of the plan a year later between October and December 2025. Whilst these optimistic timescales are commended, the Council has allowed for no buffer should the examination process be extended. Adoption of the plan post December 2025 will mean the policies do not look forward to a minimum 15-year period.

The Local Plan has therefore not been positively prepared in the context of NPPF paragraph 22. The plan period should be extended in light of this.

The District is located within the Partnership for Urban South Hampshire (PfSH) spatial planning area. In December 2023, PfSH published a Spatial Position Statement (SPS) 2023 which sought to help inform the preparation of and strategic co-ordination of local plans. The SPS has been prepared in line with the NPPF to establish and distribute the objectively assessed needs for housing and economic growth. The SPS provides an overall vision and strategic direction for new development up to 2050. The SPS underpins the assessment of your Local Plan under NPPF paragraphs 24 to 27.

Given the District’s ability to contribute significantly towards the demonstrable unmet strategic housing needs of this area (as discussed later in these representations), the plan period should be extended to align with the PfSH Spatial Position Statement December 2023 to 2050.

¹ <https://www.winchester.gov.uk/planning-policy/winchester-district-local-plan-2018-2038-emerging/local-development-scheme>

Summary/ Recommendations:

- **Extend plan period to recognise the district's location within the PfSH spatial area and the Spatial Position Statement December 2023 which underpins the assessment of your Local Plan under NPPF paragraphs 24 to 27.**

<i>Title of document:</i>	Proposed Submission Local Plan		
<i>Relevant chapter, policy, figure or paragraph:</i>	Strategic Policy SP1 'Vision and Objectives' Local Plan Vision pg19 Objectives pg20-21		
<i>Do you consider the supporting text and policy are:</i>	<i>Legally Compliant</i>	<i>Sound</i>	<i>Complies with the duty to co-operate</i>
	Yes	No	Yes

The vision and objectives must not be elevated to a strategic policy in their own right. Instead, their purpose is to define the strategic and non-strategic policies of the Local Plan and demonstrate linked themes.

Not all objectives will be relevant to all proposals. The policy does not identify how any failure to 'contribute towards' an objective or how the delivery of a neutral position will be reacted to by a decision-maker.

Notwithstanding the above, the vision and objectives fail to adequately recognise the strategic context of the district. Reference should be made within the vision (at the second bullet point) and housing objective iv) to the duty to cooperate and significant PfSH unmet needs, as this will set the scene for the growth identified in Strategic Policy H1 and beyond.

Objective iv) is currently narrowly focused to "meet local needs" instead of delivering that and understanding how unmet needs can be accommodated. The objective should be amended to "meeting the needs of the wider community" in recognition of the strategic context.

Summary/ Recommendations:

- **Amend SP1 to recognise the strategic context of the district at bullet point 2 of the vision and objective iv.**
- **Amend objective iv) to refer to the needs of the wider community.**

<i>Title of document:</i>	Proposed Submission Local Plan		
<i>Relevant chapter, policy, figure or paragraph:</i>	Strategic Policy SP2 ‘Spatial Strategy and Development Principles’		
<i>Do you consider the supporting text and policy are:</i>	<i>Legally Compliant</i>	<i>Sound</i>	<i>Complies with the duty to co-operate</i>
	No	No	No

Strategic Policy SP2 sets out the overall spatial strategy for the district and stipulates the target for new homes in each spatial area. While our detailed comments on the housing numbers are included under representations related to Strategic Policy H1 it is important to note here that all housing requirements must be expressed as a ‘minimum’, not ‘about’, in accordance with the clear need to boost significantly the supply of housing. This principle is further emphasised by the recent Written Ministerial Statement of 30th July 2024 ‘Building the homes we need’. Your Local Plan must take this into account as has been recently demonstrated by the Inspector in the examination of the Bournemouth, Christchurch and Poole Local Plan, and their August 2024 letter to the Council².

SP2 fails to recognise the importance of the District’s location within the PfSH and the contribution it can, and must, play in securing sustainable development to meet the PfSH needs. In particular PfSH SPS 2023 identifies seven broad areas of search for growth with sufficient capacity for approximately 9,700 dwellings. One of these is ‘East of Botley (Winchester)’. The accompanying ‘Statement of Common Ground – Broad Areas of Search for Growth Assessments’ does not define the geographical extent of the ‘Broad Area of Search’ however, paragraph 3.5 confirms:

Local plans will need to assess the potential suitability and deliverability of the areas of search in more detail, along with other alternatives put forward. This assessment will be informed by more detailed and comprehensive evidence, including the Sustainability Appraisal and Habitat Regulations Assessment and full public consultation with all parties.

This area of growth has a strategic role in contributing to the housing shortfall and acute housing crisis that is evidenced within South Hampshire and the spatial strategy must be explicit in promoting this as a mechanism to respond to and accommodate unmet needs in line with NPPF paragraph 11. It is not sound that the Local Plan has not taken a more positive approach to the recommendations of the PfSH SPS. While this was published in December

² <https://www.localplanservices.co.uk/bcplocalplanandcilexamination>

2023, paragraph 1 of the PfSH Statement of Common Ground – Broad Areas of Search for Growth Assessments confirms work commenced on the framework in 2019. Paragraph 2 further confirms the evidence base of the Broad Area of Search for Growth has been completed by the PfSH Planning Officers Group, a working group comprising planning officers from each of the partner authorities. WCC has therefore been involved in the joint-working production of the SPS since 2019. There has been ample opportunity for the Council to assess the potential suitability and deliverability of the area of search East of Botley as part of this Local Plan

The spatial strategy should therefore be amended to align with the PfSH SPS to set the scene for growth in this area of the District, which is outside of the three spatial areas defined in SP2. The area of search must be spatially defined on the Policies Map. It is also noted that SP2 does not align with Policy H3 or paragraph 9.17, which does highlight the future direction of growth East of Botley.

The development principles in SP2 should be removed, they duplicate the subsequent development management policies and are consequently unnecessary. PPG makes it clear that all plans need to be focused and concise.

Summary/ Recommendations:

- **Amend 'about' to 'minimum' when referring to all housing requirements.**
- **Amend SP2 to reflect the PfSH area of search 'East of Botley' and spatially define the area of search on the Policies Map.**
- **The area of search should include SHELAA site reference CU08.**
- **Remove the development principles as these are duplicated in subsequent development management policies.**

<i>Title of document:</i>	Proposed Submission Local Plan		
<i>Relevant chapter, policy, figure or paragraph:</i>	Policy CN1 'Mitigating and Adapting to Climate Change'		
<i>Do you consider the supporting text and policy are:</i>	<i>Legally Compliant</i>	<i>Sound</i>	<i>Complies with the duty to co-operate</i>
	Yes	No	Yes

FH support the Local Plan in contributing to the Council's declaration of a climate emergency and mitigating the impacts of climate change. As such we support the policy in principle. However, as drafted, the policy engages all development except householder and change of use. Not all criteria are relevant to all other types and scale of development. The policy does not identify how any failure to demonstrate one of the criteria, or how the delivery of a neutral position, will be reacted to by a decision-maker.

While an Energy and Carbon Statement must be 'proportionate' clearer guidance will be required to explain what level of information will be required to judge any conflict with CN1. The further details and checklist referred to on page 38 have not yet been published.

FH particularly object to bullet point ii, which is overly burdensome by introducing a sequential approach to the rationale for the land use / site as a matter of principle. This is not sound as it is inconsistent with national policy.

<i>Title of document:</i>	Proposed Submission Local Plan		
<i>Relevant chapter, policy, figure or paragraph:</i>	Policy CN3 'Energy Efficiency Standards to Reduce Carbon Emissions'		
<i>Do you consider the supporting text and policy are:</i>	<i>Legally Compliant</i>	<i>Sound</i>	<i>Complies with the duty to co-operate</i>
	Yes	No	Yes

As per the above, FH support the Local Plan contributing to the transition towards net zero carbon. However as drafted, the policy is overly prescriptive and does not recognise that this is an area that is continually developing. The policy would immediately require zero-carbon dwellings, and no transitional arrangements are set out for the implementation of the policy mindful of the emerging technologies and ability to implement at-scale.

The impact of the policy will result in high viability impacts which must be fully considered and understood.

While there is some recognition that this may not always be possible in the second paragraph '*These should be in line with the requirements set out below unless there are exceptionally clear and compelling reasons...*' The policy does not allow for offsetting when the requirements have not been met. If the creation of a zero-carbon home to meet criteria i to iv is judged to be economically unviable, then how would a developer be able to viably offset through developer contributions to comply with the policy?

<i>Title of document:</i>	Proposed Submission Local Plan		
<i>Relevant chapter, policy, figure or paragraph:</i>	Strategic Policy D5 'Masterplans'		
<i>Do you consider the supporting text and policy are:</i>	<i>Legally Compliant</i>	<i>Sound</i>	<i>Complies with the duty to co-operate</i>
	Yes	No	Yes

FH recognise the importance of value of taking maximum advantage of the pre-application stage in-line with NPPF paragraph 39, which set out the range of tools that are available to the benefit of all stakeholders. This includes FH seeking to agree the principles of the masterplan at pre-application stage with the LPA, following further evaluation of the site constraints.

FH support the principle of using Masterplans to guide large scale development. However, the policy as drafted is ambiguous and not effective. Clarity must be provided on what is meant by 'larger sites', 'significant development' and 'major landowners/users'.

Detail should also be provided on the mechanism that will be used by the Council to 'agree' the masterplan. FH are concerned that a requirement for 'agreement' prior to a planning application is without a defined process for that approval, or arbitration for disagreement (however unlikely). Furthermore, they acknowledge that some matters and interests may not be presented until the planning application is made, and therefore any interaction between an amended masterplan, phasing and delivery strategy or reserved matters that may not be in accordance with the principles purported to be approved. This presents an uneasy approach towards bringing forward any site captured by D5.

FH welcome further clarification from the LPA on this matter including whether they see approval of a masterplan being defined through a Development Brief, Design Guide or SPD according to a defined process giving clarity to all involved. Given the urgency to address the chronic housing needs that exist in all areas of the country, no Local Plan should contain policies that unnecessarily restrict the delivery of housing.

Title of document:	Proposed Submission Local Plan		
Relevant chapter, policy, figure or paragraph:	Strategic Policy H1 'Housing Provision' Paragraphs 9.13 to 9.21 Table H1 Table H2 Housing Topic Paper July 2024 Strategic Housing Market Assessment Update July 2024		
Do you consider the supporting text and policy are:	Legally Compliant	Sound	Complies with the duty to co-operate
	No	No	No

NPPF paragraph 60 sets out that *“To support the government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community.”*

NPPF paragraph 61 confirms that *“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”*

NPPF paragraph 63 states *“Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.”*

NPPF paragraph 67 states that *“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.”*

Setting the housing requirement

Policy H1 sets out that the plan 2020 to 2040 will make provision for about 15,115 new homes. All housing requirements should be expressed as a ‘minimum’, not ‘about’, in accordance with the need to boost significantly the supply of housing. Table H2 shows how this quantum has been determined by use of the national guidance based upon the Government’s Standard Method (calculated at March 2024), and an additional allowance of 1,900 for unmet needs in neighbouring authorities. Paragraphs 9.14 to 9.17 provide further context to explain the calculation.

The NPPF confirms the standard method for assessing Local Housing Needs. It states that this ensures that plan-making is informed by an unconstrained assessment of the number of homes needed, in a way that addresses projected household growth and affordability pressures, alongside an efficient process for establishing housing requirement figures in local plans. This is the starting point for determining housing needs and PPG makes it clear the standard method provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

While an additional requirement has been included for unmet needs elsewhere (discussed further below), it is not sound that the Council has failed to examine why it has not been appropriate to plan for a higher housing need figure than the standard method indicates given the availability of suitable and viable land. The PPG at ID: 2a-010-20201216 confirms, *“This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated.”* Paragraph 3.5 of the Housing Topic Paper July 2024 explains that:

‘A major new area of work would be required to determine an alternative housing requirement to the SM, involving reassessing demographic trends and market signals and considering whether an alternative approach to the SM could be justified. This would result in long delays to the Local Plan process, with the outcome of such work being uncertain and, ultimately, potentially not being significantly different to the SM. Using an alternative to the SM would

require a much more rigorous examination of the housing requirement by the Local Plan Inspector and could become out of date if a new method of calculating housing needs is introduced. Therefore, developing an alternative to the SM would not warrant the additional cost and delay involved, especially when the Plan is able to meet the level of need indicated by the SM. Government has re-emphasised that getting up to date plans in place 'should be seen as a priority' (NPPF paragraph 1).'

It is not considered that the desire to rush through the Local Plan process should jeopardise the delivery of homes that are needed now to meet the acute housing shortage and form the reason to discount the consideration of increasing the housing requirement. This is particularly important in the context of the WMS and the proposed NPPF reforms published in July 2024 which sees a substantial uplift in the housing need as a result of a revised standard method.

The PPG additionally identifies that affordable housing needs can be a consideration in potentially setting a housing requirement over LHN where the PPG at ID: 2a-024-20190220 states that *"An increase in the total housing figures included in the plan may need to be considered where it could help to deliver the required number of affordable homes"*.

The Winchester Strategic Housing Market Assessment Update (July 2024) sets out that there has been a significant increase in the total affordable housing need (both rented and affordable home ownership) between 2020 and 2024 of approximately 62%. The net need for social/affordable rented housing across the district has increased from 220 to 411 dwellings per annum, and for affordable home ownership the net need has increased from 123 to 147 dwellings per annum. This annual affordable need equates to over 82% of the Standard Method need for the District.

The level of need in the SHMAs conclusions has been defined using an affordability threshold of 30% of gross household income. It is noted that the PPG does not provide any guidance on choosing an appropriate threshold. MHCLG SHMA guidance prepared in 2007 suggested that 25% of income is a reasonable start point, it also noted that a different figure could be used depending on local housing costs. The ONS estimates in 2022³ that renters in the South-east spent 22.1% of their average weekly disposable income on net rent and homeowners 16.2% on mortgage costs.

The use of a 35% threshold should therefore be considered a minimum. A lower affordability threshold must not be discounted as there are considerable challenges facing many who spend

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<https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/datasets/expenditureonmortgageandrentasaproportionoftotalexpenditureanddisposableincomeuk>

a higher proportion of their average weekly disposable income on housing costs. Given the current economic market and ‘cost of living crisis’⁴, with lower quartile house prices in Winchester having risen by approximately 11.5% between September 2020 and September 2023⁵; interest rates rising from 0.1% in 2020 to a current rate of 5%⁶ (with significantly increased borrowing costs); private rental prices having increased by approximately 7% in the 12 months to February 2024 in the South East⁷, and inflationary pressures, rising housing costs will affect households across the income distribution. They are more likely⁸ to disproportionately affect those who already spend a greater proportion of their household spending on housing costs.

The approach taken by WCC to setting the housing requirement has not been positively prepared and must be increased to respond to this demonstrable unmet affordable housing need that is shown to be worsening.

An increased housing requirement coupled with a wider choice of strategic allocations are required within the Local Plan to ensure a good mix of sites, including those that can be built-out relatively quickly.

In addition to the above, to meet the housing requirements over the plan period, Table H2 confirms there is significant reliance on existing permissions and commitments to make up the housing provision. Only 18.5% of provision is sourced from new allocations in the Draft Local Plan. 12% is to be delivered through windfall development. This does not represent positive planning for additional housing needs, neither is there sufficient evidence, such as through a detailed trajectory, to demonstrate the ‘carried forward’ allocations remain deliverable in the early parts of the plan period.

This high reliance on windfall allowance is explained in the Windfall Assessment Report (2021), which justifies a provision of 115 dwellings per annum. However, it is unclear where the figure in Table H2 of 1,895 has been derived from. 115 x 15 years remaining on plan period equates to 1,725 dwellings (which is consistent with the figures in Table H3). There is therefore a shortfall of 100 dwellings in Table H2, which must be accounted for. Moreover, the windfall

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<https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/articles/impactofincreasedcostoflivingonadultsacrossgreatbritain/latest#rent-and-mortgages>

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<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/adhocs/2186housingaffordabilityinenglandandwaleslowerquartile2023>

⁶ <https://www.bankofengland.co.uk/boeapps/database/Bank-Rate.asp>

⁷ <https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/private-rent-and-house-pricesuk/september2024#private-rents-for-local-areas>

⁸ <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/howincreasesinhousingcostsimpacthouseholds/2023-01-09>

allowance has been applied over a 15-year period, starting from the year 2025/26. Developments that are delivered in the first couple years of the plan period are likely to already be known through planning permissions and as such would be counted as a commitment. To ensure there is no double-counting, a more cautious approach must be taken, and a windfall allowance should not be applied for the first three years following the plan's adoption. Using a 12-year period for windfall would result in a total of 1,380 dwellings, further increasing the shortfall to 515 dwellings.

Further allocations would be needed to account for this difference. FH's representations set out a sustainable omission site that can contribute towards these unmet needs in a demonstrably sustainable location.

Moreover, the windfall allowance of 115 per annum is high. The windfall assessment sets out that past trends suggest an average of 206 dwellings per year have been delivered through windfall development. However, it is noted that the windfall assessment is out of date as it does not include data beyond 2019, which may have an impact on past trends. This assessment should be updated to ensure the figures remain consistent and can continue to be relied upon.

FH do not agree with the statement at 9.21, that it is 'not necessary to include a 'buffer' to allow for non-delivery. Fluctuations in the deliverability of sites throughout the plan period as a result of various factors, including market conditions, are inevitable and therefore potential non-implementation of outstanding planning permissions, other commitments and windfall development, cannot be discounted. Therefore, additional allocations are required to ensure that an appropriate buffer is in place. FH suggest that a 5-10% buffer would be appropriate.

It is noted that the Government are seeking to restore the 5% buffer on housing land supply calculations to account for fluctuations as part of the emerging reforms to national planning policy. There is national recognition of the importance for a buffer to account for sites that may not come forward during the plan period, and this should also be accounted for in the housing requirements.

Unmet Needs Allowance

Strategic Policy H1 identifies an allowance for unmet needs of 1,900 homes. Paragraph 9.16 explains this is 'provided in the spirit of cooperation required by government policy, to help contribute towards PfSH shortfall.' The Housing Topic Paper July 2024 further sets out the rationale for this contribution, however it remains unclear how the figure of 1,900 has been derived or why opportunities to meet a higher quantum have been discounted.

The December 2023 PfSH Spatial Position Statement (SPS), at Table 1 identifies that, at the time of writing, there were only two authorities in the area (Fareham and Test Valley) able to demonstrate a surplus in housing supply between 2023 and 2036 – albeit these are in the context of the existing standard method constraining minimum need. Winchester is shown as meeting but not exceeding the requirements. Overall, across the 10 authorities the shortfall is almost 12,000 homes, a significant unmet need with very limited opportunities within the PfSH area to provide for it. The SPS goes on to identify that only five out of the 10 authorities have the short to medium term ability to meet and exceed standard method-based housing needs in their local plan, Winchester being one of these.

As part of the DTC process, WCC received specific requests from both Havant Borough Council and Portsmouth City Council to assist in delivering their unmet needs. The unmet needs of these two authorities alone total approximately 7,877 dwellings, as set out in paragraph 4.40 of the Housing Topic Paper and the SOCGs with these authorities. WCC do not dispute that these two Councils have unmet needs that cannot be accommodated within their areas and must be met elsewhere.

The contribution of 1,900 represents only 24% of the unmet need from Havant and Portsmouth, without accounting for the wider shortfall in the PfSH area. Given Winchester's position on the border of both of these authorities, the Council is spatially well located to deliver the fullest extent of their unmet needs.

No evidence is provided to explain why this figure of 1,900 could not be higher. The IIA does not test an option with increased housing requirements and supply, neither does it test an option with a higher level of growth through greater strategic allocations in the South Hampshire area, despite the PfSH identification of the east of Botley area of search. This is not a justified way to explain why the plan has been prepared positively. It is clear that WCC have not taken part in meaningful engagement with the neighbouring authorities to determine how they can better contribute towards the unmet needs. As Havant Borough Council set out in their August 2024 Interim SOCG with WCC *'there has been no engagement between the Regulation 18 and Regulation 19 stages from Winchester City Council in order to address the matters raised in earlier representations or the letter of 5th March 2024.'* This is a fundamental soundness concern of the Local Plan and undertaking the DTC *'in the spirit of cooperation'* does not meet the expectations of NPPF paragraphs 24 to 27, nor the WMS.

The LP and evidence base additionally allow for this unmet need to contribute to other shortfalls. For example, paragraph 4.22 of the Housing Topic Paper 2024 and the 2024 SOCG with the South Downs National Park (SDMP) authority acknowledges that any shortfall resulting

in the expected housing contribution from the SDNP part of the District (350 dwellings) can be provided for within the unmet needs allowance. This could then reduce the number of dwellings that can contribute towards unmet needs down to just 1,550.

Paragraph 9.17 identifies the area of search east of Botley, as set out in the PfSH SPS, however states that developing site allocation proposals 'will take several years to complete and will be progressed through either a review of this Local Plan or a dedicated Development Plan Document.' There are no reasons why this work would take several years to complete. As shown in the IIA July 2024, significant amounts of available land have been promoted to the Council and assessed. FH have confirmed the availability and suitability of SHELAA site reference CU08, including the submission of technical reports which demonstrate in detail, the site's opportunities and constraints, to WCC Policy Officers who have not sought to further engage prior to the Regulation 19 Plan being published. The opportunities East of Botley, including focusing development on SHELAA site reference CU08, are clear with reference to the transport infrastructure, limited constraints and land availability.

Paragraph 1.2 of the PfSH 'Broad Areas of Search for Growth Assessments December 2023 report' confirms the identification of Broad Areas of Search for Growth should relate to emerging or future local plans. It is not sound that the Council have not taken the opportunity to deliver on this area of search as part of this emerging plan and provide a valuable contribution to the unmet needs of the wider area. As set out in our previous comments to Strategic Policy SP2, the PfSH Statement of Common Ground – Broad Areas of Search for Growth Assessments confirms WCC have been involved in the preparation of the evidence base and production of the SPS since the framework was established in 2019, through the Planning Officers Group. They have therefore had ample time and opportunity to assess and deliver on this area of search.

Moreover, the Local Plan gives no timescales for a future review or production of a dedicated DPD to deal with the East of Botley area of search, including no policies which clarify how monitoring will take place. Indeed, paragraph 4.45 of the Housing Topic Paper July 2024 confirms WCC are not seeking to do an early review of the Plan, and therefore the identification of land East of Botley, is likely to be some time away. It is also noted that this statement that an early review is not being considered does not align with the proposed NPPF reforms. The new standard method proposes an annual minimum housing need figure of 1,099, this is a significant increase of 423 above the existing 676. Annex 1 of the proposed NPPF at paragraph 227 requires that Local Plans reaching adoption with an annual requirement more than 200 dwellings lower than the relevant local housing need figure will be expected to commence plan

making in the new system at the earliest opportunity to address the shortfall in housing need. As the WCC Local Plan is drafted, this requirement would apply.

Consequently, the Draft Plan must set a higher housing requirement, to meet both the acute affordable needs within the District itself and to maximise the opportunities to meet the wider unmet needs. The housing requirement is not positively prepared and justified taking into account the need to significantly boost the supply of housing. The Plan should allocate all deliverable sites in sustainable locations which provide opportunities to access services, facilities and sustainable transport options. SHELAA Site CU08 'CU08 Land at Botley Road, Station Hill' is an available, suitable, and deliverable location for housing for a minimum of 177 homes that should be defined in the Local Plan as an allocation.

Summary/ Recommendations:

- **Amend 'about' to 'minimum' when referring to all housing requirements.**
- **The housing requirement should be increased above the LHN (defined by the current standard method) in order to boost the delivery of affordable housing.**
- **The housing requirement and current unmet needs allowance of 1,900 should also be substantially increased in order to maximise opportunities to meet the demonstrable unmet need within the PFSH, including the particular needs of Havant and Portsmouth. This higher growth option has not been tested in the evidence base.**
- **The emerging standard method housing need set out in the proposed 2024 NPPF reforms substantially deviates from the current need and requires a significant uplift in the supply of housing. To ensure the WCC Local Plan is positively prepared it cannot ignore the WMS and the thrust of the Government to deliver more homes.**
- **The identified area of search 'East of Botley' should be explored immediately as part of this Local Plan and a wider choice of strategic allocations sites allocated for housing to meet the demonstrable needs that exist now.**
- **SHELAA site CU08 'Land at Botley Road, Station Hill' is an available, suitable and deliverable location for residential development of a minimum of 177 homes that should be defined in the Local Plan as an allocation.**

<i>Title of document:</i>	Proposed Submission Local Plan		
<i>Relevant chapter, policy, figure or paragraph:</i>	Strategic Policy H2 'Housing Phasing and Supply Paragraphs 9.23 to 9.25 Table H13		
<i>Do you consider the supporting text and policy are:</i>	<i>Legally Compliant</i>	<i>Sound</i>	<i>Complies with the duty to co-operate</i>
	No	No	No

Strategic Policy H2 proposes a phased trajectory for greenfield allocations, whereby the development of 795 dwellings on 12 greenfield site allocation is restricted until the later half of the plan period. Paragraph 9.23 explains this is to maintain a reasonable level of provision in these phases and prevent all housing provision being built out in the early years of the plan.

The plan conflicts with paragraph 75 of the NPPF as it is unsupported by any detailed trajectory on housing delivery over the period to 2040 and associated evidence to justify that the brownfield sites and quantum would be developable in the first half of the plan period. Paragraph 9.24 of the plan rightly acknowledges that Brownfield sites often have a long lead in time in terms of delivery. The development of brownfield sites is generally complex, with greater constraints including demolition, site contamination and remediation for example. This therefore conflicts with the approach in H2 to phase these towards the earlier parts of the plan period.

The proposed approach is wholly inconsistent with the Government’s objective to significantly boost the supply of housing and with NPPF paragraph 60 which requires that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. Restricting new development in the first half of the plan period to those existing allocations and brownfield sites prevents an even distribution of growth across the district and does not allow for a range and choice of available, suitable and deliverable sites to come forward in line with paragraph 69 of the NPPF.

The Written Ministerial Statement of July 2024 confirms the existence of acute housing needs and a national crisis of housing, which must be addressed now. The phased approach in H2 has not been positively prepared to align with Government’s clear direction of travel to increase the delivery of homes. There should not be barriers placed on the delivery of housing on sites that are immediately available, suitable and can be built out quickly.

The Plan should encourage the delivery of brownfield sites whilst not artificially restricting the delivery of available and suitable greenfield sites, which are capable of delivering homes, including affordable homes, immediately and in greater numbers.

Summary/ Recommendations:

- **The phased housing trajectory is not justified or positively planned to achieve sustainable development.**

<i>Title of document:</i>	Proposed Submission Local Plan		
<i>Relevant chapter, policy, figure or paragraph:</i>	Strategic Policy H3 'Spatial Housing Distribution' Housing Topic Paper July 2024		
<i>Do you consider the supporting text and policy are:</i>	<i>Legally Compliant</i>	<i>Sound</i>	<i>Complies with the duty to co-operate</i>
	No	No	No

FH support the identification of 'Botley' within the South Hampshire Urban Area, and the recognition of the role of the settlement outside the District in influencing the Councils housing distribution. However, as Botley itself is not within the limits of WCC, it is considered that for Policy purposes, this should read 'Area of search East of Botley'.

It is not sound that this area of search has not been further defined or assessed for allocations. FH do not agree with the statement at 9.26 which states '*There is limited scope for intensification or expansion of the strategic sites in the South Hampshire Urban Areas so only modest additional growth beyond existing commitments is proposed.*' No consideration has been given to the area of search east of Botley, where significant land has been made available for strategic allocation to contribute to the wider PfSH needs. Given the pressing immediate need for housing, and the availability of land, there is no reason why the Council should not have given any consideration to identifying suitable sites within this location given the time elapsed since the publication of the PfSH statement.

At the very least it is considered that this area of search should be spatially defined as part of H3, the Spatial Strategy and Policies Map, to confirm the direction of growth in line with the PfSH SPS.

Summary/ Recommendations:

- **The housing requirement and current unmet needs allowance of 1,900 should be substantially increased in order to maximise opportunities to meet the demonstrable unmet need within the PfSH (see earlier representations)**
- **The identified area of search 'East of Botley' should be explored immediately as part of this Local Plan and a wider choice of strategic allocations sites allocated for housing to meet the demonstrable needs that exist now. The area of search as a whole should be spatially defined on the Policies Map.**

- **SHELAA site CU08 'Land at Botley Road, Station Hill' is an available, suitable and deliverable location for residential development of a minimum of 177 homes that should be defined in the Local Plan as an allocation.**

<i>Title of document:</i>	Proposed Submission Local Plan		
<i>Relevant chapter, policy, figure or paragraph:</i>	Strategic Policy H5 'Meeting Housing Needs'		
<i>Do you consider the supporting text and policy are:</i>	<i>Legally Compliant</i>	<i>Sound</i>	<i>Complies with the duty to co-operate</i>
	No	No	Yes

No evidence has been published which demonstrates a need for 6% Self and Custom Build (SCB) housing on sites of over 50 dwellings. The Feb 2020 SHMA notes '*in recognition of the level of demand in the District, a specific planning policy should be developed to help promote and encourage delivery of self-build and custom housebuilding. It is considered that schemes could come forwards on both small and larger sites in the District; and the policy should be flexible to provide for opportunities as and when they arise on suitable sites.*' The 2024 SHMA update provides no additional information on this matter.

It must be recognised that not all allocations and settlements would be suitable for SCB, or the 6% target which may threaten the delivery of housing required to address HMA and local needs. FH ask whether the 6% is a total of all new homes, or exclusive of affordable homes, i.e. just the open market housing component?

FH do not consider that the policy wording provides the flexibility as advised and no narrative has been provided to demonstrate the trigger point of sites of 50 dwellings, or proportion being required. The policy is not justified.

<i>Title of document:</i>	Proposed Submission Local Plan		
<i>Relevant chapter, policy, figure or paragraph:</i>	Policy H6 'Affordable Housing'		
<i>Do you consider the supporting text and policy are:</i>	<i>Legally Compliant</i>	<i>Sound</i>	<i>Complies with the duty to co-operate</i>
	Yes	Yes	Yes

FH support the delivery of affordable housing within the District. We support the recognition of higher costs associated with development of previously developed land and the reduced affordable housing targets for such circumstances. We are also supportive of the reduced targets where phosphate mitigation is required.

While the reduced provision on viability grounds is supported, the Inspector should be aware that the SHMA identifies an affordable need significantly in excess of 40% of the total housing requirement. We reiterate our comments above from Policy H1, where we note the District's annual affordable need equates to over 82% of the Standard Method need for the District.

Policy H6 is sound, However, in order to account for the reduced provision of affordable housing through H6, a significantly increased housing requirement is required if the acute affordable housing needs are to be met.

<i>Title of document:</i>	Integrated Impact Assessment SHELAA		
<i>Relevant chapter, policy, figure or paragraph:</i>	SHELAA Site CU08 'Land at Botley Road' Page 199 – 201 of IIA Appendix F		
<i>Do you consider the supporting text and policy are:</i>	<i>Legally Compliant</i>	<i>Sound</i>	<i>Complies with the duty to co-operate</i>
	No	No	No

Our client’s interest relates to SHELAA Site Reference CU08 ‘Land at Botley Road. The site represents an available, suitable and deliverable location for new homes in accordance with NPPF paragraph 69 and Annex 2 which should be released for housing development in response to the important matters previously identified in these representations.

The site has been assessed as part of the Integrated Impact Assessment, the results of which are detailed in the proforma on page 199 of Appendix F.

Our commentary on each of the objectives is set out in Table 1 below. However importantly, the IIA site assessment methodology is not clear whether it only considers district or local centres within Winchester District, rather than taking into account cross-boundary relationships. The assessment should not consider Winchester District in isolation, particularly in relation to the south Hampshire Urban Area and the PFSH area of search to the east of Botley, which is identified as a location for growth to meet wider strategic needs.

Inconsistencies exist in the assessment of sites. For example, when looking at distances to a primary school (for IIA Objective 1b) for sites in Curdridge Parish, it appears that the Botley CofE Primary School (within Eastleigh Borough) has been taken into account. SHELAA sites CU06, CO10, CU08 which are near the District Boundary are said to be between 400m and 1200m from a primary school. The distance to Curdridge Primary School is greater than this and therefore it must be assumed the assessment uses Botley CofE Primary School. Objective 1a on the other hand has not considered facilities within Eastleigh Borough. This looks at distance to an NHS GP Surgery. The NHS Living Well Partnership - Botley Surgery⁹ is located almost directly opposite the primary school, equal distances from the sites mentioned previously, however the assessments conclude all sites are over 1,200m from a GP surgery. The same applies to 1e for Local Centres. These inaccuracies have not been explained.

⁹ <https://www.nhs.uk/services/gp-surgery/living-well-partnership-botley/S6D0Z>

The failure of the assessment to consider the cross-boundary relationship does not accurately portray the true sustainability of sites on the boundary, whereby future residents would benefit from the daily services and facilities of the nearest settlement. The assessment must be redone to ensure it has been positively prepared in the context of this important cross-boundary relationship and PfSH direction of growth. As prepared, the evidence and consequently site selection strategy cannot be considered justified.

<i>Table 1 – CU08 IIA assessment commentary</i>	
IIA Criteria and Assessment	Commentary
<p>IIA1 - <i>To minimise the district's contribution to climate change through a reduction of greenhouse gas emissions from all sources and facilitate the aim of carbon neutrality by 2031</i></p> <p>The IIA gives an overall effect of 'minor negative'.</p>	<p>FH disagree with the scoring that has been undertaken for Land at Botley Road against objective 1. Appendix E, table E.1 is not clear how distances from the site have been measured. All measurements should be taken from the closest point of the site.</p> <p>The IIA at 1a states the site is over 1.2km from an NHS GP. This is incorrect. The site is 1km from the Living Well Partnership – Botley Surgery. 1a should therefore be upgraded to <u>Minor Negative</u> and not Major Negative.</p> <p>We agree with 1b that the site is within 801m and 1,200m of both Botley CofE and Curdridge Primary School. This is therefore <u>Minor Negative</u>. Notwithstanding this, it is noted that there are inconsistencies in the way the sites have been assessed.</p> <p>We agree with 1c that the site is over 2km from a secondary school. This is therefore <u>Major Negative</u>.</p> <p>We agree with 1d that the site is over 1.2km from a town centre. This is therefore <u>Major Negative</u>.</p> <p>We disagree with 1e which states that the site is over 800m from a district or local centre. The site is 500m from the Botley Village Centre identified by Eastleigh Borough Council, which offers a range of shops and services including a convenience store, pharmacy, post office, hairdressers as well as a number of pubs and restaurants. This is therefore <u>Minor Negative</u>.</p>

	<p>We agree with 1f and 1g as the site is adjacent to both rail and bus stations. These are therefore both <u>Major Positives</u>.</p> <p>We disagree with 1h which gives a minor positive. The methodology is unclear what consists of open country. The site is adjacent to the open countryside and contains PRowS which would be retained. The assessment has also not considered development opportunities. The site size means there would be ability to provide enhancements to the open space on site, and therefore result in major positive impacts. We consider this should be a <u>Major Positive</u> impact.</p> <p>We agree with 1i which gives a <u>minor positive</u>.</p> <p>Consequently, the site would score a total of 0.11 points, which would result in a Minor Positive conclusion.</p>
<p>IIA2 - <i>To reduce the need to travel by private vehicle in the district and improve air quality.</i></p> <p>The IIA gives an overall effect of ‘minor negative’.</p>	<p>The effects to objective 2 were assessed in the same way as objective 1. Therefore, for the reasons above, we consider this should result in a Minor Positive conclusion.</p>
<p>IIA4 - <i>To improve public health and wellbeing and reduce health inequalities in the district</i></p> <p>The IIA gives an overall effect of ‘negligible’</p>	<p>FH agree with the conclusions of 4a, 4b, 4c, and 4d.</p> <p>We disagree with 4e as the site is 1km from the Living Well Partnership – Botley Surgery. 4e should therefore be upgraded to <u>Minor Negative</u>.</p> <p>4f should also be upgraded to <u>Major Positive</u> as the site is adjacent to the open countryside and contains PRowS which would be retained.</p> <p>We agree with the conclusion of 4g of <u>Major Positive</u>.</p> <p>Consequently, the site would score a total of 0.57 points, which would result in a Minor Positive conclusion.</p>
<p>IIA7 - <i>To ensure essential services and facilities and jobs in the district are accessible.</i></p>	<p>Similarly, to IIA objectives 1 and 2, the effects of site options in relation to IIA objective 7 were tested by spatial analysis of</p>

The IIA gives an overall effect of 'minor negative'.	their access to essential services and facilities, public transport, open space, and employment. The same criteria were applied and the same SA scores reported as for IIA 1 and 2. Therefore, the effect should also be adjusted to Minor positive .
IIA8 - <i>To support the sustainable growth of the district's economy</i> The IIA gives an overall effect of 'negligible'	The site is not in existing employment use and therefore FH agree that the effect is negligible .
IIA9 - <i>To support the district's biodiversity and geodiversity.</i> The IIA gives an overall effect of 'significant negative'.	FH agree with the scoring criteria and that the effect is significant negative .
IIA10 - <i>To conserve and enhance the character and distinctiveness of the district's landscapes</i> The IIA gives an overall effect of 'negligible uncertain'	FH agree with that the site has low overall landscape sensitivity and that and that the effect is negligible .
IIA11 - <i>To conserve and enhance the district's historic environment including its setting</i> The IIA gives an overall effect of 'negligible uncertain'	FH agree with that the site should be rated green for effects on heritage assets and that and that the effect is negligible .
IIA12 - <i>To support the efficient use of the district's resources, including land and minerals</i> The IIA gives an overall effect of 'significant negative'.	FH agree with the scoring criteria and that the effect is significant negative .
IIA13 - <i>To protect the quality and quantity of the district's water resources</i> The IIA gives an overall effect of 'negligible'	FH agree with that the site is not within a source protection zone or drinking water safeguarded zone, and that and that the effect is negligible .
IIA14 - <i>To manage and reduce flood risk from all sources</i> The IIA gives an overall effect of 'negligible'	FH agree with that the site has low risk of fluvial and surface water flood risk and that and that the effect is negligible .

Based on the above, FH consider the scoring criteria against the IIA objectives is inaccurate. Table 2 below compares the scoring of WCC against the adjusted score, which shows improvements against four objectives.

IIA Objective	WCC IIA Score	Adjusted Score
IIA1: Climate change mitigation	Minor negative (-)	Minor positive (+)
IIA2: Travel and air quality	Minor negative (-)	Minor positive (+)

IIA4: Health and wellbeing	Negligible (0)	Minor positive (+)
IIA7: Services and facilities	Minor negative (-)	Minor positive (+)
IIA8: Economy	Negligible uncertain (0?)	Negligible uncertain (0?)
IIA9: Biodiversity and geodiversity	Significant negative (-)	Significant negative (-)
IIA10: Landscape	Negligible uncertain (0?)	Negligible uncertain (0?)
IIA11: Historic environment	Negligible uncertain (0?)	Negligible uncertain (0?)
IIA12: Natural resources	Significant negative (-)	Significant negative (-)
IIA13: Water resources	Negligible (0)	Negligible (0)
IIA14: Flood risk	Negligible (0)	Negligible (0)

As discussed previously in these representations to Policy H1, there are demonstrable reasons why a higher housing requirement should be delivered, including to meet the acute affordable housing needs in the District, and to maximise the opportunities to meet the wider unmet needs which exist now. The area of search east of Botley must be considered immediately as a solution to address this as part of this Local Plan, and not be pushed to many years down the line when the housing crisis will continue to worsen.

Based on the adjusted score and revised methodology above for site CU08, the results have been evaluated against all other assessed sites within the Parish of Curdrige (which is considered the most likely location for the area of search east of Botley). Table 3 below shows that the site now scores favourably against all other sites and equally to those that have been allocated as part of the extensions to North Whiteley, or which have received planning permission.

Site ref	IIA1	IIA2	IIA4	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14	Notes
CU01	-	-	-	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU06	+	+	+	+	0?	--	0?	0?	--	0	0	<i>Planning permission granted and performs equally to CU08</i>
CU08	+	+	+	+	0?	--	0?	0?	--	0	0	
CU09	-	-	0	-	0?	--	-?	0?	--	0	0	CU08 performs stronger than this site.
CU10	-	-	-	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU11	-	-	-	-	0?	--	-?	0?	--	0	0	CU08 performs stronger than this site.
CU12	-	-	-	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU13	-	-	+	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU14	+	+	+	+	0?	--	0?	0?	--	0	0	<i>Allocated - Policy SH2 and performs equally to CU08</i>
CU15	-	-	+	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU16	-	-	-	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU18	-	-	+	-	0?	--	0?	0?	--	0	0	<i>Allocated - Policy SH2 v</i>
CU22	-	-	+	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.

CU23	-	-	+	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU24	-	-	+	-	0?	--	0?	0?	--	0	-	Allocated - Policy SH2 although CU08 performs stronger
CU25	-	-	-	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU26	-	-	+	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU27	-	-	-	-	0?	--	-?	0?	--	0	0	CU08 performs stronger than this site.
CU28	-	-	+	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU29	-	-	-	-	0?	--	-?	0?	--	0	0	CU08 performs stronger than this site.
CU31	-	-	+	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU32	-	-	+	-	0?	--	-?	0?	--	0	0	CU08 performs stronger than this site.
CU33	-	-	-	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU34	+	+	+	+	0?	--	0?	0?	--	0	0	Allocated - Policy SH2 and performs equally to CU08
CU35	-	-	+	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU36	-	-	-	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU37	-	-	+	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU39	-	-	+	-	--?	--	0?	--?	--	0	0	CU08 performs stronger than this site.
CU40	-	-	+	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU42	-	-	0	-	0?	--	-?	0?	--	0	0	CU08 performs stronger than this site.
CU43	-	-	+	-	0?	--	-?	-?	--	0	0	CU08 performs stronger than this site.
CU44	-	-	-	-	0?	--	0?	0?	--	0	0	CU08 performs stronger than this site.
CU45	+	+	+	+	0?	--	0?	0?	--	0	0	Allocated - Policy SH2 and performs equally to CU08
CU46	-	-	+	-	0?	--	0?	0?	--	0	0	Allocated (carried forward) CU08 performs stronger.

FH consider site ref CU08' and at Botley Road, Station Hill' should be allocated within the Local Plan for the residential development of a minimum of 177 dwellings. In addition to the criteria discussed above, the site is located in a demonstrably sustainable location; 100m from the Botley Railway Station which provide services between Portsmouth Harbour and London Waterloo, and is the only rail station within the South Hampshire Urban part of the District. , and adjacent to bus stops on both Station Hill and Botley Road, which provide further services to Fareham, Whitely, Swanmore and Hedge End. The site also lies adjacent to the safeguarded route of the proposed Botley Bypass major infrastructure project.

The allocation of the site for a minimum of 177 homes would provide a substantial contribution towards an increased housing requirement at an appropriately scaled growth, on a deliverable site within an area recognised for growth by the PfSH Spatial Position Statement.

Summary/ Recommendations:

- **The above example critiques the methodology and outcomes used within the Integrated Impact Assessment which would need to be addressed should the Council continue to utilise this approach.**
- **The identified area of search ‘East of Botley’ should be explored immediately as part of this Local Plan and a wider choice of strategic allocations sites allocated for housing to meet the demonstrable needs that exist now.**
- **SHELAA site CU08 ‘Land at Botley Road, Station Hill’ is an available, suitable and deliverable location for residential development of a minimum of 177 homes that should be included as an allocation in the Local Plan. It is in a demonstrably sustainable location, recognised as an area for growth by the PfSH Position Statement and offers the potential for Winchester City Council to support the creation of a successful and logical extension to Botley, that would provide a substantial contribution towards an increased housing requirement.**
- **SHELAA site CU08 is immediately available and benefits from being promoted by a housebuilder who can bring forward houses on the site quickly to support the government’s objective to boost significantly the delivery of new houses. Foreman Homes are a sub-regional housebuilder that deliver 200-300 units per year across a range of sites in the region.**
- **The following enclosures are submitted to support the consideration of CU08 as an allocation for a minimum of 177 homes:**
 - **MLP Letter to WCC dated October 2024**
 - **Drawing No. 22.137.01 Location Plan**
 - **Drawing No. 22.137.SK01B Concept Plan**
 - **Drawing No. 22.137.SK02A Illustrative Masterplan**
 - **Access and Transport Report**
 - **Landscape and Visual Technical Note**
 - **Flood Risk Assessment**
 - **Interim Ecological Assessment**
 - **Biodiversity Net Gain Feasibility Report**
 - **Preliminary Noise and Vibration Assessment**
 - **Land at Station Hill, Botley Vision Statement**