

**Representations to  
Winchester City Council's District  
Local Plan 2020 - 2040  
Regulation 19 Consultation**



**Land at Dean Down Drove**

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BSc (Joint Hons) MSc MRTPI



Client: ██████████

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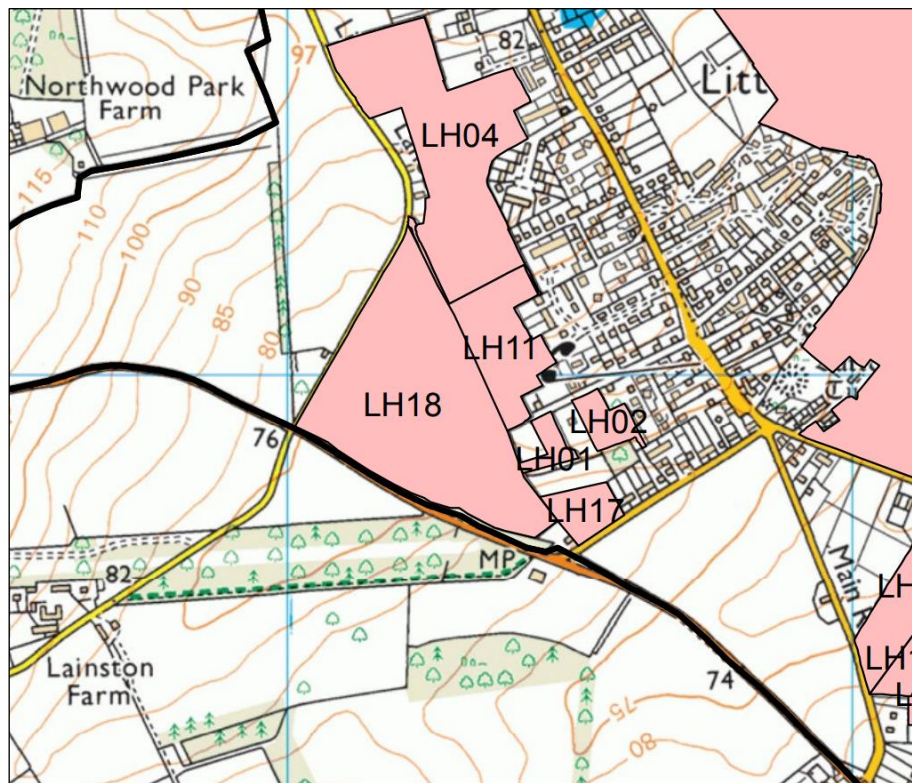
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<u>Contents:</u>	Page
<b>1.0 INTRODUCTION .....</b>	<b>3</b>
<b>2.0 THE OPPORTUNITY- LAND AT DEAN DOWN DRIVE .....</b>	<b>4</b>
<b>3.0 RESPONSE TO VISION AND OBJECTIONS AND SPATIAL STRATEGY .....</b>	<b>7</b>
<b>4.0 RESPONSE TO HOUSING PROVISION .....</b>	<b>8</b>
<b>5.0 CONCLUSION .....</b>	<b>10</b>

## 1.0 INTRODUCTION

- 1.1 This document has been prepared by Southern Planning Practice Ltd on behalf of N Craig-Harvey, who owns the land at Dean Down Drive, Littleton. This land is included as site LH17 in the 2023 SHEELA and identified as deliverable. It is shown below.



Extract from the 2023 SHEELA

- 1.2 These representations are made in response to the current Winchester District Local Plan 2020-2040, Regulation 19 public consultation document and in light of the proposed changes to the National Planning Policy Framework (NPPF).
- 1.3 It is disappointing to see that this site has not been included in the allocations when it provides a fantastic opportunity to expand the settlement of Littleton in a sympathetic manner. It would result in a logical extension to the existing settlement boundary by a small proportion, to the south east. This would follow the natural pattern of existing development along Dean Down Drive and would not harm the rural character of the settlement.

## 2.0 THE OPPORTUNITY– LAND AT DEAN DOWN DROVE

### SUMMARY

- The site is available for development now (within 0-5 years)
- The development of this site for residential dwellings would promote the viability and vitality of Littleton, whilst maintaining the rural character of the village
- The site presents a suitable infill development opportunity site within an existing ribbon of continuous development on the north side, fronting onto Dean Down Drove.
- The size and scale of the site would meet the requirements of Paragraph 70 of the NPPF, being “no larger than one hectare”. It should therefore form “at least 10%” of the housing requirement on sites proposed for allocation under the new draft plan.
- The whole site could include more than 20 homes at a density appropriate to the existing built form and the surrounding area.
- The site has been designed to include an appropriate number of affordable housing units.
- The site does not encroach on the local gap (policy CPI8)
- There is surplus area on the northern section of the site to provide for BNG.

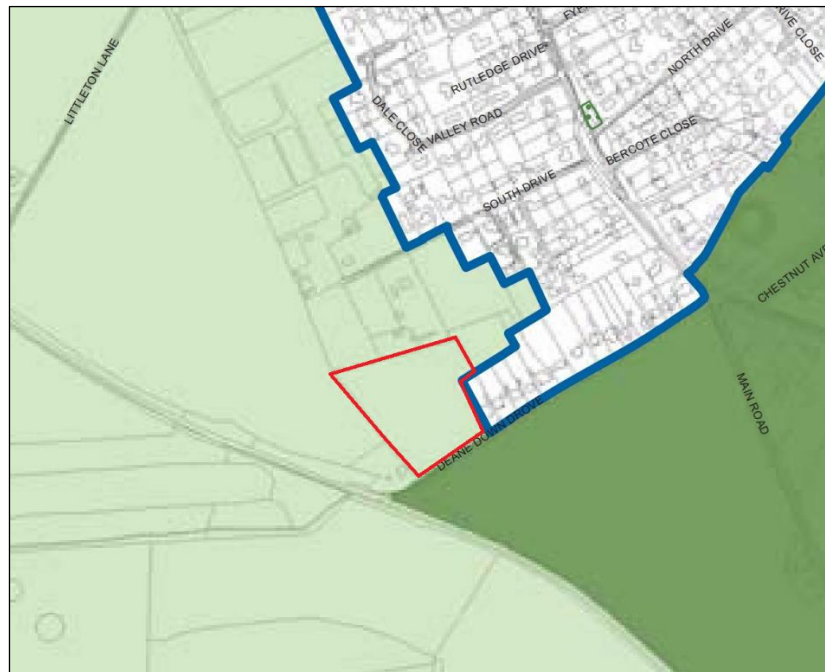
2.1 The land at Dean Down Drove measures 0.96ha and is located on the south west of Littleton, with direct access onto Dean Down Drove (30mph speed limit). It is approx. 0.5km from the village centre, 2.5km from Winchester town centre and 1.2km from the nearest services, shops, schools, surgery and facilities. There is a bus stop where Dean Down Drove meets the main road (north east).

2.2 It is a parcel of land nestled between two residential properties (Apley House and Ponthilly) and rises gently to the north. It is an obviously suitable infill development site within a ribbon of continuous development fronting onto Dean Down Drove.



Application site extents

2.3 The site lies immediately adjacent to the existing settlement boundary for Littleton . The gap between Harestock and Littleton is located to the south east (Policy CPI8). An extract from the Winchester North and Littleton proposals map (Development Management and Site Allocations (LPP2) is shown below:



Extract from the proposals map

- 2.4 The site has potential for development of more than 20 homes, at a density appropriate to the existing built form and the surrounding area. It would also be possible to accommodate a new safe vehicular access, direct from Dean Down Drive. The area in the north west section of the site would provide for BNG.



Potential layout of residential development and new access

- 2.5 In accordance with the definition of 'deliverable' within the NPPF (2023), the site is available for development now, is in a suitable location for future residential development and is achievable. It should therefore be considered a realistic allocation as housing could be delivered within the next five years
- 2.6 The site could satisfy 2 of the key issues of the district as set out in paragraph 9.8: "*housing affordability*" and "*housing for all sectors of the community*" by including affordable housing units in the middle of the community.
- 2.7 This land at Dean Down Drive would meet the size threshold of Paragraph 70 of the NPPF which recognises the "important contribution" small sites make to meeting housing requirements and the speed of delivery compared to larger sites. Councils are encouraged to

“promote the development of a good mix of sites” and should identify “at least 10% of their housing requirement on sites no larger than one hectare”. There is no reason why sites such as this land at Dean Down Drove, which can be started immediately, should not be included.

2.8 Paragraph 72 of the NPPF acknowledges that Local Planning Authorities can make an allowance for windfall sites in the five-year housing land supply and any windfall allowance should have regard to the SHELAA, historic windfall delivery rates and expected future trends.

2.9 The pressure to deliver windfall housing can have a potentially harmful impact on smaller settlements, such as Littleton. New site allocations should be appropriately located to enhance and conserve the existing character of settlements. Land at Dean Down Drove, due to its size and scale, is considered more appropriate to the existing scale and character of Littleton as opposed to the larger scale sites coming forward in the spatial area, such as Sir John Moor Barracks which would potentially encroach on the local gap (policy CPI8) and lead to a sprawling effect.

### 3.0 RESPONSE TO VISION AND OBJECTIONS AND SPATIAL STRATEGY

3.1 In response to Strategic policies Spatial Policy SPI and Spatial Policy SP2 as far as they relate to the potential development of land at Dean Down Drove, the following comments are made:

#### *Strategic Policy SPI - Vision and Objectives*

3.2 Development of the site at Dean Down Drove would meet the vision and objectives of this policy and would deliver a high quality sustainable and inclusive development over the plan period.

#### *Strategic Policy SP2 – Spatial Strategy and Development Principles*

3.3 The development of this site, through an appropriately designed scheme and comprehensive landscaping strategy would promote the vitality and viability of Littleton whilst maintaining the rural character and individual settlement, as required by this policy.

## 4.0 [RESPONSE TO HOUSING PROVISION](#)

4.1 The response to Strategic policy H1 and the housing provision for the plan period, in relation to the potential development of land at Dean Down Drove is as follows:

### [SUMMARY](#)

- The Council have over relied previously allocated sites in the housing requirement figure (para 9.18 and Table H1).
- It is unrealistic to rely on NDP areas to deliver over the plan period since they are at an early stage of preparation.
- In order to deliver the government's housing targets it is possible that the Council should further support the unmet needs of neighbouring local authorities (Table H2)

### *Strategic policy H1 – Housing Provision*

4.2 Paragraph 9.18 of the draft local plan states that *“There are a large number of sites which already have consent for residential development, some of which have been completed since the start of the Local Plan period (2020), or which are allocated by the existing Local Plan but have not yet been developed”*. Breaking down the housing requirement figure put forward, only 2,876 (18.6%) of those dwellings are from new allocations. In our view, this is too low a proportion and this should be increased. There are more deliverable sites available, as identified through the 2023 SHEELA which could provide a more secure form of housing supply.

4.3 There appears to be an over reliance on previously allocated sites, some of which form complex brownfield sites which notably have not come forward in previous plan periods (e.g. Station Approach, the Central Winchester Regeneration Area and Clayfield Park). Therefore, the deliverability of such sites is questioned. If a site cannot be demonstrated as available, suitable and achievable, it should not be included as an allocation. Without sufficient justification, these previously allocated sites should potentially be deleted.

4.4 Further, the draft local plan refers to Neighbourhood Plan (NDP) designated areas to contribute to the housing requirement figure. However, the status of those NDPs and potential allocations within them are at early stages of preparation and it is unrealistic to rely



on those NDP areas to deliver over the plan period. The Council should be confident these homes will come forward through the respective NDPs. Otherwise, further sites in areas should be allocated to ensure the required homes come forward.

- 4.5 Table H1 sets out the housing requirement figure for the district as 13,565, as calculated using the standard method. However, this method is generally used to calculate **a minimum** number of homes and the Council should therefore add a buffer margin above the figure (as per paragraph 61 of the NPPF and Planning Practice Guidance (PPG) Paragraph: 001 Reference ID: 68-001-20240205).
- 4.6 The proposed changes to the NPPF seek to significantly boost housebuilding in order to deliver the Government's commitments to build 1.5 million new homes and include a new standard method for calculating housing need. It is anticipated these changes will increase numbers and the Council should plan for this potential uplift and increase their figures accordingly.
- 4.7 In order for the Local Plan Review to meet the 'positively prepared' test of soundness, the Local Plan review must "*provide (ing) a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development*"<sup>1</sup>. Table H2 sets out the additional housing provision to meet the unmet need arising from neighbouring authorities. However, in the light of the new Government's ambitious housing targets it is considered that this provision will also need to increase, as those neighbouring authorities will need to take account of the proposed revisions to the NPPF. For example, Southampton City Council's housing need may increase by a further 15% under the proposed new standard method for calculating housing need.
- 4.8 The Council should be more ambitious in its overall housing numbers to fulfil both the housing need of the district and any unmet need arising from neighbouring local authorities, particularly authorities within the Partnership for South Hampshire (PFSH) area, in accordance with NPPF guidance.
- 4.9 Another pertinent point to note is the impact which the recent mandatory Biodiversity Net Gain (BNG) will have on the capacity of those allocated sites. The requirement for BNG onsite

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<sup>1</sup> as required by paragraph 35 a) of the NPPF

may have a significant impact on the ability for the sites to deliver the number of homes they are allocated for. Therefore, to ensure that the Local Plan can meet the identified housing needs and is positively prepared, the Council needs to ensure that the housing numbers each site is proposed to be allocated for is realistic and achievable.

4.10 The Council should look to smaller sites to assist in the delivery of the shortfall of homes which may be generated through the BNG requirement. As set out in Section 2 of these representations, the land at Dean Down Drove provides a great and realistic opportunity to allocate further land in an accessible, sustainable location. Whilst it is a small site, it would deliver some of the required housing needs of the District, over the early stages of the plan period.

## 5.0 CONCLUSION

5.1 The land at Dean Down Drove presents a rare opportunity to develop a small site which can deliver much needed housing immediately.

5.2 The site location allows for a logical extension to the settlement boundary for Littleton and would make an important contribution to the District's housing land supply figure.

5.3 The site should be included in any shortfall identified in the Council's housing provision which will inevitably arise as a result of the Government's ambitious building targets, recently reflected in the latest proposed changes to the NPPF.