

Town and Country Planning Act 1990 (As Amended)

Winchester Local Plan
Regulation 19 Consultation – August-October 2024

Representations on Behalf of:
Ibex Homes Limited

8 October 2024



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Appendices:

Appendix 1 Plans pack for Ibex Homes Limited Promotion Site at Mitre Building

1.0 Instructions and Introduction

- 1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by Ibex Homes Limited ("Ibex") to prepare and submit representations in relation to the Regulation 19 consultation version of the Winchester Local Plan ("the Plan") published in August 2024.
- 1.2 This document sets out Ibex's Representations on the Plan and deals with the following specific matters:
- Matters of Legal Compliance
 - Consideration of the correct Housing Need and Housing Requirement within the Plan in the context of the Housing Supply identified by the Council; and,
 - Site-specific representations in relation to Ibex's promotion site at Mitre Building,
- 1.3 The relevant sections of the Plan, including paragraph and policy references, are cited throughout these representations along with the soundness tests that it is considered the Plan fails to comply with.
- 1.4 These representations are supported by a plans pack in Appendix 1.

2.0 Review of Plan Objectives and Policies

Strategic Policy SP1- Vision and Objectives

OBJECT

- 2.1 It is unusual that a policy in a plan should require development proposals to demonstrate how they contribute to and meet the vision and objectives of the plan. A vision leads to a plan objectives, which should then inform both the SA or IIA, and then appear threaded and embedded into the very wording of policy. The vision and objectives are not, on their own policies, for the purpose of decision making. The onus should be placed on the Council in their review of the success and function of policies within the regular review periods (Annual Monitoring Statement, for example) to evaluate whether the objectives of the plan are being met and update and review policies as appropriate.
- 2.2 It is of concern that the Council consider the vision and objectives of the plan to hold policy weight, and that this policy will be monitored by the number of planning applications that are refused permission that do not meet the vision and objectives of the plan. Plans should be pro-development, pro-growth, pro-sustainable development and it seems contradictory of Government Policy that this policy should be measured by the number of refusals and appeals.
- 2.3 It is Ibex's firm opinion that this policy should be removed from the Plan.

Strategic Policy SP2- spatial Strategy and Development Principles

OBJECT

- 2.4 There is no Sustainable Development Policy within the plan. This is not the Sustainable Development Policy despite being referred to as such within the plan. This policy is titled, "Spatial Strategy and Development Principles" and sets the broad principles for development in this district.
- 2.5 It is recommended that the Council amend the policy wording to explicitly state that the Council is committed to delivering sustainable development.
- 2.6 Ibex supports the principles set out in SP2 however it does not agree that the Council has planned for sufficient housing for their own needs and those of adjoining districts

and boroughs with unmet need. Not does it provide sufficient housing for the growing housing need nor does it provide a sufficient number of homes to deliver the requirement of affordable housing which currently is published to stand at 1, 579 households. The policy does not have Sustainable Development at its heart or core.

Strategic Policy H1 – Housing Provision

OBJECT – UNSOUND – Not positively prepared, justified or consistent with national policy

- 2.7 The importance of significantly boosting the supply of housing nationally cannot be underestimated as a core Government objective running to the heart of the planning system. In fact, the new Labour Government's recent consultation that ran between July – September 2024 on the proposed reforms to the planning system incorporated a series of measures designed to deliver this objective over the course of the parliamentary term.
- 2.8 It is therefore of serious concern that WCC has chosen to rush the publication of its Regulation 19 consultation with the express intention of trying to avoid the impact of the Government's proposed changes to the Framework 2023. This express intention was explicitly set out by Officers and endorsed by Members of the Council, at their meeting on 28 August 2024.
- 2.9 The Council's approach is deliberately intended to 'kick the can down the road' in terms of meeting its full and up-to-date calculation of Local Housing Need ("LHN"), which when calculated via the Government's proposed changes to the Standard Method would lead to an increase from 676 dpa to 1,099 dpa (an uplift of 423 dpa or 62.6%).
- 2.10 The Council's approach does not represent positive or proactive planning. By seeking to take advantage of the proposed transitional arrangements the Council is delaying the delivery of much needed new homes (both open market and affordable homes). The proposed changes to the Framework 2023 clearly confirm that in circumstances where a Council adopts a Local Plan with a housing requirement that is more than 200 dpa below the new Standard Method calculation of LHN (as is the intention of the Council here) then it will be required to undertake a review at the 'earliest opportunity'.

- 2.11 Not only is the Council seeking to delay the delivery of much needed new homes, but it will also put itself to the time and cost of bringing forward two Local Plans back-to-back. That is not effective or efficient planning.
- 2.12 Ibex are of the opinion that the Council has failed to plan for sufficient housing and in doing so, should reconsider the plans housing requirement. It is therefore vital that this Plan seeks to deliver the correct level of new homes over the Plan period in order to avoid an exponential worsening of affordability.

Strategic Policy H2- Housing Phasing and Supply

OBJECT

- 2.13 To compound the situation the Council is proposing a phased delivery or 'stepped trajectory' within the Plan in order to be able to maintain a rolling 5-year housing land supply.
- 2.14 Setting aside the concerns raised above in relation to the overall under-provision within the Plan it is clear from Appendix 5 of the Housing Topic Paper that a stepped trajectory is not required in this instance. The level of overprovision projected by the Council in the table at Appendix 5 clearly demonstrates that a flat trajectory would work (using the Council's figures) and therefore phasing is not required and does not represent a sound approach to Plan making in Winchester.
- 2.15 Set in the context of the proposed new Standard Method and the substantial uplift to the LHN that it generates the Council should be taking every opportunity to deliver as much housing early in the Plan period as possible rather than actively seeking to restrict the flow of delivery. That is neither effective nor positive planning.
- 2.16 Policy H2 should therefore be deleted because it is unsound.

Strategic Policy H3- Spatial Housing Distribution

OBJECT

- 2.17 Ibex supports and agrees with the spatial distribution of housing and in turn the hierarchy of settlements. Bishops Waltham is a Market Town, along with New Alresford. Market Towns are highly sustainable settlements, with a number of shops and services and serving populations in the area rather than just the settlement itself. It is Ibex's opinion that Bishop's Waltham is capable of delivering more than the current allocated 100 units at Land North of Rareridge Lane.

- 2.18 It is clearly evident that Winchester needs to find further housing sites and Market Towns are capable of accommodating this growth, in particular Bishop's Waltham.
- 2.19 The Council face needing to find additional sites to meet their plan housing needs and increasing the housing requirements for Bishop's Waltham as a sustainable settlement, high in the settlement hierarchy. is a logical and reasonable method of increasing housing supply during the plan period.

Policy H4- Development within Settlement Boundaries

OBJECT

- 2.20 Ibex cannot agree with this policy wording. Bishops Waltham is expected to deliver 99 dwellings through windfall permissions during the plan period. The Bishops Waltham settlement boundary has been extended to include the allocations within the Town, but these are drawn tightly around these allocations and existing development leaving no additional land within the settlement boundary for new housing. It is quite clear that there is very limited capacity within the confines of the existing settlement boundary, given that the allocations site on the outer edges and therefore it is not clear where the windfall dwellings are able to be located. There is no capacity study for Bishops Waltham to demonstrate how these dwellings could be located.
- 2.21 This policy should be supported by evidence that demonstrates Bishops Waltham is able to provide its windfall development. If the Council is unable to demonstrate that there is sufficient capacity, the settlement boundary should be extended to accommodate further allocations/ residential growth.

Strategic Policy E3- Town Centres Strategy and Hierarchy

SUPPORT

- 2.22 Ibex agrees with the wording of this policy and that Bishop's Waltham is considered a District Centre. Bishop's Waltham has a number of services and independent retail outlets. It does however raise concern about there is still an outward migration for many staple supplies. There is only one single small supermarket within Bishop's Waltham that also supports outlying villages and hamlets. The next closest supermarkets are in Eastleigh, Hedge End and Whiteley.

Policy E8- Local Shops, Services and Facilities

SUPPORT

- 2.23 Ibex supports Winchester's approach to new development within the Countryside where there is an identified need (criterion i) and that there are no other suitable alternatives. This is a pragmatic approach to supporting the local economy where the principal shopping areas are heavily constrained and the modern need for retail and services requires a different approach, including sufficient dedicated car parking, and HGV access for re-supply.

3.0 Site-Specific Representations in Relation to Mitre Building, Botley Road.

- 3.1 Ibex Homes Limited own a site west of Botley Road called the Mitre Building. The Mitre Building is currently in business use. Ibex wish to promote the site for residential uses, capable of contributing 5 units to the housing land supply.
- 3.2 The current building is not capable of conversion and therefore the promotion of the site is on the basis of demolition of existing building and structures and the construction of 5 sympathetically designed new build dwellings.
- 3.3 The Mitre Building is set within a small enclave of buildings which are all in residential use. Returning this site to residential use, and subject to a sensitively designed scheme at planning application stage, would be entirely compatible with the character and appearance of the area.
- 3.4 No new vehicle access would need to be provided, with utilisation and formalisation of the existing access serving Mitre Building and Thickets House, and Thickets Lodge. The promotion site is also capable of connecting to the existing infrastructure network, subject to any necessary local upgrades.
- 3.5 The site is located in Flood Zone 1 and is not subject to any statutory or local designations. There are, therefore, no technical constraints to delivering the site. It is a logical, available, deliverable and achievable site for residential development within an existing residential area.
- 3.6 The Mitre Building should be considered for allocation during the main modifications stage of the plan, as it is necessary for the Council to re-consider and boost housing delivery during the plan period, especially within the first five years of plan adoption due to the increase in housing need through the new (currently draft) proposed Standard Method under the NPPF, as set out in Section 2 of these Representations.

4.0 Areas Where Changes are Required for Plan to be Legally Compliant and Sound

4.1 In order for the Plan to be found Sound and Legally Compliant there are a number of fundamental changes required:

4.1.1 **Change 1 - Soundness:** There is a need to revisit the minimum housing requirement in the Plan in line with the evidence base and in particular dealing with unmet need and the worsening affordability in the district.

4.1.2 **Change 2 - Soundness:** The Council must revisit its housing delivery strategy and address the clear shortfall in supply across the whole Plan period and particularly within the first 5-years through the allocation of more sites that are ready and able to deliver in the early part of the Plan period.

4.1.3 **Change 3- Soundness:** The Council is required to review and amend the policies in relation to the representations made in Section 2.

4.1.4 **Change 4 – Soundness:** Ibex Homes Limited Promotion Site, Mitre Building, Botley Road, should be allocated for approximately 5no. Dwellings and is capable of delivery in the first 5-years of the Plan period alongside a package of community planning benefits.

4.2 Ibex will continue to engage with the Council and would welcome the opportunity to discuss its Promotion Site with the Council at the earliest opportunity.
