

## Privacy and publication

We are unable to legally accept anonymous submissions to the consultation. You must therefore provide your consent below before you are able to submit your response.

### Privacy Notice

Any personal information that you supply to Winchester City Council will only be used for the purposes of the work required to prepare a Local Plan under the Planning Acts. We need to collect this information in order to maintain accurate records to ensure that you can be properly involved in the preparation of the Local Plan. This will include general updates on the progress on the Local Plan, sending updates/surveys/newsletters, inviting comments on the Local Plan as it moves through its statutory stages and being notified of the date of the Local Plan Examination and be invited by the Inspector to speak at the Local Plan Examination. Any comments that are received in connection with the Local Plan will be published but they will only display the person/organisation name and postcode beside them. Any information that is received, including contact details, will only be kept until the Local Plan is adopted.

As part of our statutory functions, we will share data with the Planning Inspectorate who will hold the Public Examination on behalf of the Ministry of Housing, Communities and Local Government. You have the right to see what information is held about you, to have inaccurate information corrected, to have information removed from our system unless we are required by law or a statutory purpose to keep it and the right to complain to our Data Protection Officer if you feel that your data has not been handled in accordance with the law.

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**1. Please confirm that you have read and understood the above.**

**(Required)**

## **PART A**

### **About you**

Please add your personal details below. If you are acting as an agent, please also fill in your details where requested below.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publicly available, therefore we cannot accept anonymous representations. The Council will publish names and associated representations on its website but will not publish personal information such as telephone numbers, or email addresses.

You must fill in these details before you can submit the form.

#### **2. What is your full name or client's name if acting as an agent?**

Name of respondent (or client): (Required)

#### **3. If you are representing an organisation or acting as an agent, please provide the name below.**

Organisation/Agent:

#### **4. What is your address?**

If you are responding on behalf of an organisation, please put the organisation's address below. If you are acting as an agent, please put the company address below.

House number/name: (Required)

Street address 1: (Required)

Street address 2:

Town/area: (Required)

Postcode: (Required)

**5. What is your email address?**

Email address:

**6. What is your phone number?**

(Required)

Phone number:

**7. By submitting this form I acknowledge that;**

**a) my response, together with supporting information, which includes my name, address and contact details will be sent to the Local Plan Examination Programme Officer and the Planning Inspectorate; and**

**b) my name will be published, together with my response, in the Winchester City Council Local Plan Examination website.**

**8. Please select the box below if you would like to be kept up to date on the developments to the Local Plan via the email you have provided?**

Yes, I would like to be kept up to date with Local Plan developments

No

**PART B**

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

H2
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**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

See text below
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Please make sure that you put in all the evidence and information needed to support your representation.

**What modification(s) are necessary to make the policy legally compliant or sound?**

See text below
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**What is your suggested wording or text for the policy:**

See text below
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**The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination. If the Inspector invites you, do you consider it necessary to participate in the examination hearing sessions?**

(Required)

- Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
- No, I don't want to take part in a hearing session

## H2 DETAILED COMMENTS

Pro Vision is acting on behalf of Bargate Homes, in regard to its specific interests in Coldon Common: SHELAA Sites CC04 (Land at Main Road) and CC05 (Lower Moors Road).

Colden Common is a Large Rural Settlement in the Settlement Hierarchy (Strategic Policy H3) reflecting its level of daily facilities and other facilities (Settlement Review Background Paper August 2024), including Primary School and convenience retail, which are recognised as 'key services', and including amongst others, post office and doctors ('other services').

Evidence confirms that this large village has a good degree of sustainability and is also close to the principal settlement in the district (Winchester), therefore, is a logical location for sustainable growth.

For Colden Common 90 dwellings are allocated in the Local Plan. We note, however, that there is additional capacity for development; the available land is assessed to have a capacity of 551 homes (paragraph 6.33, DSSS<sup>1</sup>, 2024). The proposed allocation equates to less than a fifth of the capacity identified in the evidence base, which is not a positive planning response in the context affordability issues and unmet needs from neighbouring authorities.

We support the inclusion of Land at Main Road (Site CC04/Policy CC3). As noted, this is controlled by Bargate Homes, and there is commitment to deliver this development. Please refer to our more detailed comments on Policy CC3.

However, we object to the proposed re-allocation of Clayfield Park (CC1) (SHELAA Site CC19), which we consider not be an effective policy decision. Please refer to our detailed comments on Policy CC1.

We also object to the phasing of the supply of new homes, as set out in this policy and subsequent site allocation policies. This is not in accordance with the national policy objective to significantly boost housing supply and avoid delays in planning permissions being

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<sup>1</sup> Development Strategy and Site Selection, July 2024.

implemented to deliver new homes (NPPF 60). It is not justified in the context of affordability being one of the most significant issues in the district – and delivery of affordable homes “a major issue” and “a critical priority”(Local Plan paragraph 9.36) – plus significant levels of unmet need from neighbouring authorities. (Please also refer to our comments on Policy CC3).

**Our proposed modification is the deletion of a proposed allocation at Site CC19 (Clayfield Park) and its replacement with Site CC05 (Lower Moors Road), or inclusion of both sites. This proposed change is justified by the superior sustainability performance in the Integrated Impact Assessment of CC05 and its potential for affordable homes**

**PART B**

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

CC1 Clayfield Park
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**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

See text below
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Please make sure that you put in all the evidence and information needed to support your representation.

**What modification(s) are necessary to make the policy legally compliant or sound?**

See text below
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**What is your suggested wording or text for the policy:**

See text below
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**The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination. If the Inspector invites you, do you consider it necessary to participate in the examination hearing sessions?**

(Required)

Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

No, I don't want to take part in a hearing session

#### CC1 DETAILED COMMENTS

Pro Vision is acting on behalf of Bargate Homes, in regard to its specific interests in Coldon Common: SHELAA Sites CC04 (Land at Main Road) and CC05 (Lower Moors Road).

We object to the repeated allocation of Clayfield Park (SHELAA Site CC19) based on the evidence of availability and deliverability and availability of alternatives in this sustainable settlement.

Bargate Homes has control of site CC05 (Lower Moors Road), which appears to have been overlooked in the evidence base but represents a credible and likely more effective site option.

CC19 was allocated for redevelopment in the Local Plan Part 2 – Development Management and Site Allocations (LPP2), which was adopted by the Council on 5 April 2017. In the more than 7 years since there has been no progress in bringing that site forward for the form of development proposed by the allocation. There have been 2 planning applications at the site since April 2017, though neither of them for residential development associated with the site allocation:

- [18/02847/FUL](#) for the demolition of an existing storage building and the erection of new workshop and store; and
- [24/01557/FUL](#) for a single storey extension to the workshop subject of 18/02847/FUL.

The assessment of CC19 in the SHELAA (2023) is therefore out of date and erroneous in reporting that there is no planning history. There is recent planning history, and this indicates that commercial uses are continuing on the allocated site rather than efforts to bring the site forward for the allocated housing.

We also note that there is no information on availability and achievability in the SHELAA 2023 site assessment pro forma for Site CC19, which again indicates that the selection of this site for re-allocation is not justified by the evidence base.



Pro Vision have reviewed the Council data contained within the Site Assessment Proformas from [Appendix F of the Integrated Impact Assessment \(IIA\)](#) that supports the Regulation 19 version of the emerging Local Plan (the Local Plan) at face value and without any weighting, and have ascribed notional scores to each IIA Objective as follows (to allow comparisons between the sites):

(++) or (++)?	+5
(+) or (+?)	+2
0 or 0?	0
(-) or (-?)	-2
(--) or (--?)	-5

Please see the attached Pro Vision analysis of the Colden Common IIA.

The results of this exercise, on the Council’s own conclusions, clearly indicate that the Lower Moors Road site (CC05), promoted by Bargate Homes for around 45 to 55 homes<sup>2</sup> scores better than the site that is proposed for re-allocation (CC19 Clayfield Park) allocated for 48 units.

We also note from our wider analysis of the IIA that CC19 site is the worst scoring site of any of the proposed allocations in the plan.

It is recognised that CC19 is a previously developed site and therefore, on the face of it, fits with the ‘brownfield first’ approach, but in the context of the significant question marks over its deliverability, this benefit may be irrelevant. As PDL, it also means that the site would be expected to yield fewer affordable homes, compared to greenfield alternatives (policy H6), and be more vulnerable to viability issues. In the context of the major issue of affordability in the district (please refer to our comments on Strategic Policy H2 and Policy CC3) this consequence is highly relevant.

We note that the Parish Council’s own assessment shortlisted six sites, including CC05. It then selected three of those short-listed sites and omitted three, including CC05<sup>3</sup>.

We note that following five criteria were used by the Parish Council:

1. Would development conserve important local views and rural identity?

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<sup>2</sup> Site CC05 in Appendix F of the IIA; promoted via Reg 18 representation [630714471](#)

<sup>3</sup>Pg73-74 of the Development Strategy and Site Selection Topic Paper (July 2024) relating to the Submission plan refers, incompletely, to a response by Colden Common Parish Council that occurred on “24 May”.

2. Would the expected yield of each site be in character with the village?
3. Would development on the site be a natural extension of the village?
4. Is this site important to protect the rural aspect of the village?
5. Would you be in favour of this site being developed?

This local level assessment, whilst clearly an indication of local opinion at a point in time, which represents a relevant material consideration (although it is without the status of a Neighbourhood Plan and its basic conditions tests), also needs to stand up to scrutiny against the tests of the IIA. Our concern is that the District Council has in this case, simply taken the local community assessment, which was not an objective, criteria-based assessment, and run with that notwithstanding the results of the IIA, which is a key plank of the evidence base. CC05 was a locally shortlisted site, and combined with the stronger scoring on the IIA, is a logical site allocation.

Why was CC05 omitted? With reference to the Development Strategy and Site Selection 2024 (DSSS), the only possible explanation for the omission of CC05 is that it was not one of the three locally preferred sites at the time of the Parish Council consultation. It is the only SHELAA site in Colden Common that is not discussed at DSSS paragraph 6.35, which provides the commentary to justify the Local Plan site selection for the village. Therefore, all of the SHELAA sites for the settlement are accounted for in the evidence base, with the exception of CC05.

Our concern is that the merits of CC05 have not been properly considered and it has 'fallen between the gap' of the IIA and the Parish assessment.

It is also important to note that the Clayfield Park site is in two separate ownerships (HP643929 and HP854756), as is the Lower Moors site (HP765366 and HP621215). While the two parts of the Clayfield Park ownership are held by the same owner, there is a further leasehold (HP786078) recorded as affecting the eastern part of the Clayfield Pk holding, with a 15-year lease that commenced in Sept 2012 (so runs until Sept 2027). The Clayfield Park site is also not recorded as optioned to a developer. In contrast, the two Lower Moors land holdings are both optioned to Bargate Homes.

Allocation of site CC19 in the adopted Local Plan has therefore so far proven to have been ineffective as the site was not, and has no indication of being, delivered over the plan period. In the absence of firm evidence of availability and deliverability, indeed indication that it is continuing in commercial use, rolling that site forward to the new Local Plan without reevaluating its planning merits against alternatives, risks this problem of soundness (the effective test) being repeated (NPPF 35).

In this context of uncertainty over availability of Site CC19, national policy is relevant. NPPF 126 directs that the LPA should review whether there is reasonable prospect of an application coming forward and may even be appropriate to reallocate the land for other uses or deallocate the undeveloped site.

It is clear that the Lower Moors site (CC05) has the advantage of being available and deliverable (by a developer with a proven track record in the local area), on a higher scoring site than one that is proposed for re-allocation in the Local Plan. Allocation of CC05 would be a more effective policy option. Re-allocation of CC19 is not supported by evidence and is simply a carry forward from the adopted plan without reading market signals that the site looks unlikely to be delivered.

Alternatively, the addition of CC05 alongside re-allocation of CC19 would be an option to strengthen delivery in the context of needing to boost supply.

We resubmit Bargate Homes' concept master plan that indicates how site CC05 can deliver a high-quality residential development, with affordable housing, within the plan period.

**Our proposed modification to strengthen the effectiveness of Policy CC1 is either the deletion of Site CC19 (Clayfield Park) because of uncertainty over its availability and deliverability and its relative poor performance in the IIA, and the allocation of Site CC05 (Lower Moors Road) in its place, or the inclusion of CC05 to strengthen the supply, including boosting the supply of affordable homes. Updates to the SHELAA are also necessary for Site CC19.**

		<u>Page in eLP</u>	<u>Page in IIA Appx F</u>	IIA1: climate change mitigation	IIA2: travel and air quality	IIA4: health and wellbeing	IIA7: services and facilities	IIA8: economy	IIA9: biodiversity & geodiversity	IIA10: landscape	IIA11: historic environment	IIA12: natural resources	IIA13: water resources	IIA14: flood risk		
<b>LARGER RURAL SETTLEMENTS COLDEN COMMON</b>																
CC1	Clayfield Park	421	CC19	148	(-)	(-)	(+)	(-)	(--?)	(--)	(0?)	(0?)	(--)	(--)	0	<b>-24</b>
					-2	-2	2	-2	-5	-5	0	0	-5	-5	0	
CC2	Colden Common Farm	423	CC02	106	(-)	(-)	(+)	(-)	(0?)	(--)	(0?)	(0?)	(--)	(--)	0	<b>-19</b>
					-2	-2	2	-2	0	-5	0	0	-5	-5	0	
CC3	Land at Main Road	427	CC04	115	(-)	(-)	(+)	(-)	(0?)	(--)	(-?)	(0?)	(--)	(-)	0	<b>-21</b>
					-2	-2	2	-2	0	-5	-2	0	-5	-5	0	
CC4	Land adjoining 85 Church Lane	431	CC15	136	(-)	(-)	(+)	(-)	(0?)	(--)	(0?)	(0?)	(--)	(-)	0	<b>-16</b>
					-2	-2	2	-2	0	-5	0	0	-5	-2	0	
<b>BARGATE OMISSION LOWER MOORS ROAD SITE</b>																
		n/a	CC05	118	(-)	(-)	(+)	(-)	(0?)	(--)	(-?)	(0?)	(--)	(--)	0	<b>-21</b>
					-2	-2	2	-2	0	-5	-2	0	-5	-5	0	



- 1 Public Open Space
- 2 Proposed vehicular access
- 3 Connection to existing footpath and bridleway
- 4 Enhancement of existing vegetated boundary
- 5 Proposed vegetated boundary

Indicative range 45-55 units

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ISSUE	DATE	DESCRIPTION	DRAWN	CHECKED
DD1	08.12.22	First Issue	RD	

CLIENT:	Bargate Homes Ltd		
PROJECT:	Land off Lower Moors Road, Colden Common		
DRAWING:	Sketch Layout Plan	1:1000	
NUMBER:	51328-P1-01-SP	A3	
ISSUE:	D01	08.12.22	



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**PART B**

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

CC3 Main Road, Colden Common

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

See text below

Please make sure that you put in all the evidence and information needed to support your representation.

**What modification(s) are necessary to make the policy legally compliant or sound?**

See text below

**What is your suggested wording or text for the policy:**

See text below

**The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination. If the Inspector invites you, do you consider it necessary to participate in the examination hearing sessions?**

(Required)

- Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
- No, I don't want to take part in a hearing session

### CC3 DETAILED COMMENTS

Pro Vision is acting on behalf of Bargate Homes, in regard to its specific interests in Coldon Common: SHELAA Sites CC04 (Land at Main Road) and CC05 (Lower Moors Road).

Land at Main Road is allocated for development under Strategic policy H2 and Policy CC3.

Bargate Homes continues to support the allocation of this site and is committed to bring it forward. It performs well in the Integrated Impact Assessment (IIA), as we discuss below. Its selection as one of the allocated sites for the village is justified by the evidence base.

We support Policy CC3, supporting its indicative capacity for “about 35 dwellings”. And for the most part, we support the development criteria to guide further development proposals.

We object however to the first criterion, which delays development of the site. This policy decision is holding back a deliverable site, with the commitment of Bargate Homes to bring it forward, and the associated affordable housing in the context of an acute affordability issue in the district and a significant scale of unmet need from neighbouring authorities. As reported by officers in meetings to discuss the timing of the submission of the Local Plan (in the context of the new standard method arising from revisions to the NPPF by the new government) “Delivering affordable housing remains a key priority and is one the greatest challenges facing the district”. That is reflected at paragraph 9.36 of the Local Plan, where delivering affordable homes is “a major issue” and “critical priority”. National policy (NPPF 60) remains clear that plan-making needs to boost housing supply and avoid unnecessary delays to getting land consented for development and delivering the homes that are needed. (Please also refer to comments made by tor&co on behalf of Bargate on the Spatial Strategy<sup>4</sup>).

**Our proposed modification is the removal of the first criterion, allowing delivery of homes and affordable homes at the earliest opportunity.**

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<sup>4</sup> Representor [321953529](#).