

## Winchester District Local Plan 2020-2040: Regulation 19 Consultation

### Representations – Bargate Homes

### Land South of Lower Chase Road, Waltham Chase

11th October 2024

#### Policy H1 – Housing Provision

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

<i>(Required)</i>	<i>Yes</i>	<i>No</i>
<i>Legally compliant</i>	<i>X</i>	
<i>Sound</i>		<i>X</i>
<i>Complies with the duty to co-operate</i>	<i>X</i>	

*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)*

Paragraph 61 of the NPPF requires that in addition to meeting local needs, any needs that cannot be met within neighbouring areas should be taken into account.

Winchester District Council, in conjunction with nearby authorities, have jointly identified an unmet need for 11,771 homes between 2023 and 2036 across the area covered by the Partnership for South Hampshire (PFSH) which includes the southern part of Winchester District – see PFSH Spatial Position Statement 2023.

The authorities propose to address this need through a two stage approach. Stage one: in the short to medium term five authorities (Winchester, East Hampshire, Eastleigh, Fareham and Test Valley) “should be able to meet and potentially exceed NPPF 2023 standard method-based housing needs in their respective local plan areas” (PFSH Spatial Position Statement 2023). The Statement goes on to set out that stage two is to identify Broad Areas of Search for Growth to contribute towards meeting ongoing unmet housing need in the longer term.

Havant Borough Council and Portsmouth City Council have both formally requested assistance from Winchester City Council with meeting expected shortfalls of about 4,300 and 3,577 dwellings respectively, a total of 7,877 dwellings.

Winchester District has larger areas of unconstrained land than nearby authorities. It is capable of accommodating more than the 1,900 dwellings proposed towards unmet need. The Strategic Housing and Employment Land Availability Assessment (SHELAA) 2023 states that there is a theoretical residential capacity of SHELAA sites totalling 62,359 dwellings, therefore far in excess if the 1,900 currently proposed contribution towards unmet need. The opportunities that these sites present should be fully explored to inform the actual quantum of housing that the District can accommodate. This should include a proper review of existing Settlement Gaps (see our comments in relation to the Development Allocations section of the Plan in relation to concerns about how sites within the Gap have been assessed).

Furthermore, the housing supply relied upon should provide for sufficient contingency to accommodate the inevitable non-delivery and delays that will affect some sites. Many LPAs and Inspectors have concluded that the housing requirement should include such a ‘buffer’ above the full housing need in order to ensure that

housing needs will be addressed. The ‘buffer’ to be applied in any one LPA will be largely determined by the reliability of the supply but is normally at least 5% if not 10%.

However, the draft Local Plan provides no such ‘buffer’ and is therefore entirely reliant upon 100% of the supply delivering within the plan period. This is entirely unrealistic, particularly given that the Plan relies upon the delivery of a number of large brownfield sites, including Sir John Moore Barracks (WC2) 900 dwellings and Central Winchester Regeneration Area (WC7) 300 dwellings. Previously developed land often takes longer to deliver, particularly large sites such as these, and is likely to deliver reduced/no affordable housing given existing land values and higher development costs. As such, it is entirely appropriate to include a buffer to allow for slow/reduced delivery.

The application of a conservative 5% buffer above the need for at least 13,565 (excluding unmet needs) would result in a minimum housing requirement of 14,243 dwellings (excluding unmet needs). An appropriate unmet need figure will need to be added to this amount. As set out above, this should be increased given the relatively unconstrained nature of the District and the theoretical capacity identified within the SHELAA. The overall housing provision should be increased following a robust assessment of capacity to respond to a pressing need for open market and affordable housing and student accommodation within the District.

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

Policy H1 should be amended to increase the overall provision of housing, to be informed by a thorough analysis of the capacity of SHELAA sites – the Plan should not be progressed to Examination until this work has taken place.

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

Please see response to question above.

**Policy H3 - Spatial Housing Distribution**

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

<i>(Required)</i>	<i>Yes</i>	<i>No</i>
<i>Legally compliant</i>	<i>X</i>	
<i>Sound</i>		<i>X</i>
<i>Complies with the duty to co-operate</i>	<i>X</i>	

*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)*

Bargate Homes support the principle of the Draft Plan’s spatial strategy for distributing housing across a hierarchy of settlements based on their relative sustainability. However, the Plan fails to achieve that for the reasons set out below, and as such should be revised in order for it to be found sound.

The distribution proposed in the emerging plan is unevenly weighted in favour of focusing the majority of new development in urban areas. As set out in our comments on Policy H1, this includes large brownfield sites in central Winchester which are likely to be slow to come forward and offer reduced levels of affordable housing. Of the 15,115 dwelling suggested requirement (which we contend should be substantially higher,

as set out in our comments on Policy H1), 11,290 (75%) are either in Winchester Town (5,640) or in the South Hampshire Urban Areas (Newlands, West of Waterlooville and Whiteley) (5,650). That leaves just 4,250 (25%) to be accommodated in the Market Towns and Rural Area (MTRA) which, as set out in the table contained in Policy H3, comprises 12 settlements along with the remaining Rural Area. This pattern of development is likely to lead to a growing concentration of services in the existing, larger, urban areas to the detriment of investment in the settlements across the rest of the District (the MTRA). Over time, this will lead to negative impacts on the vitality and viability of the MTRA with associated detriment to the quality of life of those living there both now, and in the future, contrary to the 'Living Well' objective of the Draft Plan which seeks to "Deliver inclusive communities with a range of services and infrastructure".

This pattern of growth is also unsustainable because the likely gradual degradation of rural services will lead to a high number of people travelling to the larger urban areas to access services and facilities. This will give rise to an increase in the number of vehicles on the road with associated localized effects on air quality, ground water quality and ecology. It will also lead to less socially cohesive communities, as people will be less likely to venture out if there are reduced services to access.

A more even distribution across the three main areas identified to accommodate housing would lead to far more sustainable pattern of development across the District and provide the population to support existing and future services in the less urban / rural locations. It is therefore essential to allocate a greater number of sites within the MTRA to even up the balance.

There is also an overreliance on existing, large and often complex allocations. The two allocations relied on in the South Hampshire Urban Areas are long standing allocations being developed by consortia and that have both been subject to delays during their respective build out periods as a result of issues associated with their size. It is not unlikely that the remaining phases will be subject to the same slow delivery pace, particularly whereby consortium member payment of the costs associated with the on-going delivery of large-scale joint infrastructure may need to be renegotiated.

For all of the above reasons, there should be an increase in the level of housing provision within the MTRA tier of the settlement hierarchy, derived from a District wide increase in provision. Bottom of Form

We also have concerns around the imbalanced spatial distribution of housing across the MTRA. Policy SP2 provides housing figures to be delivered in Winchester, South Hampshire Urban Areas, and the MTRA – for the MTRA about 3,850 homes. Policy H1 then repeats this distribution, although the MTRA figure is 3,825, not 3,850.

Policy H3 then splits the 3,825 homes in the MTRA into commitments and new allocations spread between five market towns, five larger rural settlements, five intermediate settlements, and the remaining rural area.

The five larger rural settlements are Colden Common, Denmead, Kings Worthy, Swanmore and Wickham. Waltham Chase previously fell into this tier of the settlement hierarchy but was downgraded at Regulation 18 stage to the intermediate settlement tier – Bargate Homes previously objected to this re-categorisation and continue to do so (as set out further below and in in our comments on the Settlement Hierarchy Review) and strongly advocate that Waltham Chase should fall within the larger rural settlement tier given the sustainability credentials of the settlement.

Policy H3 proposes new allocations of 610 homes to the five larger rural settlements. The table on page 389 of the Draft Plan states that each of these settlements were asked to identify new sites for 90-100 homes – at most this would add up to 500 new homes, not 610. However, Waltham Chase should also be asked to identify 90-100 dwellings and be classified as a larger rural settlement (as was originally proposed as part of the Local Plan preparation process) taking the total to circa 600 homes.

Furthermore, the 610 total proposed allocation figure is skewed because it includes an allocation of 200 dwellings at Knowle (Policy KN1 – Ravenswood). Knowle is a small settlement in the rural area of Wickham Parish, not at Wickham. This undermines the spatial strategy which bases housing distribution on the sustainability of settlements, not parishes. There is also uncertainty around the deliverability of KN1. Despite an application for 200 dwellings being submitted in June 2018 (ref. 18/01612/OUT), planning permission has yet to be granted. As such, there is no clear evidence that homes will be delivered at the site and it does not therefore meet the definition of deliverable within Annex 2 of the NPPF. It should not be relied upon to meet the housing needs of the larger rural settlements.

Of the remaining 410 dwellings, only 290 will deliver open market and affordable housing. This is because the 120 dwellings at two allocations in Kings Worthy (KW1 and KW2) are for older persons housing.

We submit that the Plan should be amended prior to its publication so that its allocations better reflect its spatial strategy. The 200 home allocation at Knowle should be deducted from the larger rural settlements total, leaving 410 dwellings. To help address this shortfall, we suggest that housing should be distributed across the larger settlements which have no new open market and affordable housing allocations, including Waltham Chase where Land at Lower Chase Road (SHELAA Site SH11) should be allocated for about 90 dwellings.

Notwithstanding that we maintain our position that Waltham Chase should be reinstated into the larger rural settlements tier, the Regulation 19 Plan categorises it within the intermediate settlements tier alongside Hursley, Otterbourne, South Wonston and Sutton Scotney. Policy H3 proposes new allocations of only 155 homes across these five settlements. The table on page 389 states that all of these settlements were asked to identify new sites for 50-60 homes – this would add up to between 250 and 300 homes, not 155, therefore a shortfall of between 95 and 150 dwellings. This is in part due to an over-reliance on the rolling forward of historic allocations from the adopted Local Plan, including Morgans Yard in Waltham Chase (Policy WC1). We have concerns around the deliverability of Morgans Yard as set out further in our comments on Policy WC1.

Returning to the categorisation of Waltham Chase within the settlement hierarchy, Bargate Homes object to its downgrading to an 'intermediate settlement' in Policy H3. Waltham Chase is a sustainable location for new development, with a range of services and facilities, including a primary school, regular bus services, a convenience store/post office, hairdressers and nursery.

The settlement hierarchy in the adopted Local Plan includes Waltham Chase as a 'larger village' within the MTRA tier of the settlement hierarchy. At the early stages of the Local Plan review, WCC asked Shedfield Parish Council to accommodate 90-100 dwellings in Waltham Chase. Shedfield Parish Council then suggested that Waltham Chase should be downgraded in the settlement hierarchy so that its requirement is reduced, which WCC acceded to. The 2022 SHR was prepared in the context of this request such that the downgrading of Waltham Chase in the settlement hierarchy is not due to the sustainability credentials of the settlement.

Indeed, as set out in our comments in response to paragraph 14.189 of the Draft Plan, and in response to the Settlement Hierarchy Review (SHR) 2024, the SHR has several shortcomings. Its methodology and assessment should be updated to better reflect the level of services and facilities on offer at Waltham Chase. Waltham Chase should be re-categorised as a 'larger rural settlement'.

As set out elsewhere in these representations, Bargate Homes' site, Land South of Lower Chase Road in Waltham Chase (SH11), has scored equivalent to, or higher than (allowing for corrections the site assessments) the site allocation at Morgan's Yard (WC1), which has been rolled forward as an allocation in the Draft Plan. Accordingly, given WC1 has been considered suitable for allocation, there is no overriding reason why SH11 cannot be allocated to address the imbalanced distribution of housing across the District.

Furthermore, we have concerns around the deliverability of WC1 and the failure of the Plan to adequately plan for the future needs of Waltham Chase.

Policy MTRA 2 of the Local Plan Part 1 (adopted in 2013) set out the provision of about 250 dwellings in each of the 'larger villages', which included Waltham Chase. The Local Plan Part 2 (adopted in 2017) went on to allocate a total of 275 dwellings at Waltham Chase across four sites (WC1-WC4) towards meeting the Plan's housing requirement over the period 2011-2031. The allocations at WC2-WC4 were built out in the early part of the Plan period, delivering a total of 174 dwellings. However, the allocation for 100 dwellings at WC1 has yet to deliver any dwellings.

Policy H3 of the Draft Plan carries forward the Morgans Yard allocation, but reduces the number of dwellings at the site to 80, reflecting the resolution to grant planning permission for this amount in January 2024 (ref. 21/02439/FUL). The site has suffered from viability issues, largely as a result of substantial remediation costs. Despite a resolution to grant planning permission in January 2024 (almost seven years after it was first allocated), a S106 Agreement has yet to be entered into and planning permission has not been granted. As such, there is no clear evidence that homes will be delivered at the site and it does not therefore meet the definition of deliverable within Annex 2 of the NPPF. It should not be relied upon to meet the housing needs of Waltham Chase.

In contrast, SH11 offers the opportunity to provide high quality open market and affordable housing on a site which has no significant constraints and lies adjacent to the settlement policy boundary. Development would result in a logical rounding off of the settlement by continuing the existing pattern of development no further north than Lower Chase Road to the north, ensuring only negligible impact on the existing Gap. It should therefore be allocated for the development of around 90 dwellings and Policy H3 should be amended accordingly.

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

Policy H3 should be amended to increase the amount of new allocations across the MTRA and Waltham Chase should be moved to the larger rural settlements tier. See response to question below.

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

Policy H3 should be amended to uplift the amount of new allocations across the MTRA by at least 30% (ie. to at least 1,255 dwellings) to help meet the increased housing requirement set out in our response to Policy H1. We would welcome the opportunity to discuss the appropriate figure and how this is distributed across the MTRA at the Examination Housing round table session.

Policy H3 should also be amended to move Waltham Chase to the larger rural settlement tier and the new allocations total for this tier should be increased to allow for the allocation of 90 dwellings at Land South of Lower Chase Road (SHELAA ref SH11). The table on pages 389 and 390 should be updated accordingly. The Policies Map should also be amended to show the allocation of SH11.

*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)*

X      *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*

**Development Allocations – The Market Towns and Rural Area**  
**Policy WC1 – Morgans Yard**

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

<i>(Required)</i>	<i>Yes</i>	<i>No</i>
<i>Legally compliant</i>	<i>X</i>	
<i>Sound</i>		<i>X</i>
<i>Complies with the duty to co-operate</i>	<i>X</i>	

*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)*

Paragraph 14.189 sets out that "following the reassessment and updating of the settlement hierarchy, Waltham Chase is now within the group of 'intermediate' settlements, where the aim was to identify new sites for 50-60 dwellings".

Waltham Chase is a large village with a range of services and facilities making it a sustainable location for new development (see Bargate Homes' Vision Document for Land South of Forest Road, April 2022 - submitted in support of these representations).

The Winchester Settlement Hierarchy covering the Market Towns and Rural Area Background Paper (May 2009), which was prepared to inform the Local Plan Part 1 (LPP1), identified Waltham Chase as a higher order settlement in the District, concluding that "There are also a number of smaller settlements that score well, taking a combination of connectivity score, population and 2009 service score it is evident that Colden Common, Kings Worthy, Swanmore, Waltham Chase, Wickham, and Denmead perform well and provide a range of local services. Also these all rely to some extent on New Alresford or Bishops Waltham, in addition to Winchester or more urban areas outside of the District. Blueprint responses also reiterated their importance as local service centres for the daily needs of many smaller rural settlements."

Policy MTRA1 of the adopted LPP1 went on to identify the provision of about 250 dwellings in each of the 'larger villages', including Waltham Chase. The Local Plan Part 2 (LPP2) subsequently allocated four sites for development within Waltham Chase, totalling 275 dwellings, recognising that it is a sustainable location for new development.

The Settlement Hierarchy Review (SHR) 2021, continued to identify Waltham Chase as a larger village, falling within the second tier of the settlement hierarchy 'Market Towns and Larger Villages'.

However, the 2022 SHR downgrades Waltham Chase to a new group of 'intermediate settlements'. We submitted detailed representations at the Regulation 18 stage setting out why we considered that the 2022 SHR was flawed, but the 2024 Update to the SHR maintains the position that Waltham Chase should be categorised as an intermediate settlement. A number of flaws remain with the latest SHR and its revised methodology, which fails to properly acknowledge the range of services and facilities in the village.

Waltham Chase should be re-categorised as a 'larger rural settlement' and Land South of Lower Chase Road (SHELAA Site SH11) should form a new allocation to help meet housing needs.

Paragraph 14.189 goes on to state "However, given the constraints around the village, particularly the narrow settlement gap with Swanmore, and the substantial level of allocated land remaining to be developed, no new sites are allocated in this Plan".

Turning to the gap point first, it should be noted that the adopted Local Plan Part 2 allocated development on the eastern side of Waltham Chase within what was gap at that time. Policy WC4 'Forest Road (North and South)' allocated land for the development of about 85 dwellings, demonstrating that the removal of land from this part of the gap was acceptable. These sites have now been built out by Bargate Homes.

SH11 is entirely contained within an existing field parcel which benefits from boundary vegetation including hedgerows and trees. As such it is already visually well contained. Furthermore, as illustrated in the Vision Document submitted with these representations, SH11 could be developed with a substantial enhanced landscape buffer along its eastern and northern boundaries, such that the extent of built development would not extend materially further east into the gap than the recent development to the south at Hawthorn Grove (the northern part of the WC4 allocation). This would allow for a logical rounding off of the settlement. The gap to the east of the proposed built development to Swanmore would be in excess of 500m with very limited, if any, inter-visibility to Swanmore due to the extent of existing intervening trees and vegetation, which could be further supplemented by landscape planting along the eastern and northern boundaries of the site, thereby creating a robust and permanent defensible boundary. The development would be perceived as a modest, logical extension to Waltham Chase, linked seamlessly into the Hawthorn Grove development to the south. As such, the function of the gap and the separate identities of Waltham Chase and Swanmore would not be undermined.

The Settlement Gap Review (July 2024) fails to consider if all of the land within the Waltham Chase to Swanmore Gap is necessary to prevent the coalescence of the settlements, having regard to maintaining their physical and visual separation, as per Partnership for South Hampshire guidance 'Policy Framework for Gaps' (2008).

For the reasons set out above, we contend that it is not necessary to include SH11 within the gap. Indeed, paragraph 4.10 of the Settlement Gap Review states "The following features are important in retaining a sense of separation between Waltham Chase and Swanmore:

- Tree cover that limits the visual impact of development in the settlement gap.
- The retention of field boundaries and agricultural land use.
- The avoidance of further infilling of development along connecting roads."

In respect of tree cover, no trees would need to be removed to bring forward SH11 and additional trees would be planted as part of a comprehensive landscaping scheme. Whilst the land use would change from agricultural to residential, the scheme could be designed in a sympathetic manner, retaining existing field boundaries. Finally, as above, the development would represent a rounding off of the settlement rather than infilling.

As such, SH11 would not conflict with the identified important features of the gap and should not constitute a reason for discounting it as an allocation.

The second reason given for the lack of new allocations at Waltham Chase is that there is a "substantial level of allocated land remaining to be developed". This refers to Allocation WC1 'Morgan's Yard Mixed Use Allocation', which was allocated for about 100 dwellings in the LPP2 in April 2017. However, there are clearly a number of matters which call into question the delivery of this site.

WC1 allocates the site for "the development of about 100 dwellings, extension of the adjoining St John the Baptist Primary School, and employment generating uses to replace existing jobs lost on the site". Despite being allocated for development in April 2017, a planning application was not submitted until September 2021. The application originally proposed 98 dwellings and employment provision but was revised such that the quantum of dwellings proposed was reduced to 80.

Furthermore, the application proposes to deliver only 10% affordable housing (8 dwellings) on viability grounds, against a requirement of 40% as set out in Policy 3 of the LPP1. The number of dwellings proposed under WC1 was increased to about 100 during the preparation of the LPP2 to reach a level of development that was considered to be viable and could deliver the full 40% affordable requirement (40 dwellings), and included WC1a to allow for the main site to maximize development potential. The current application would therefore deliver 32 fewer affordable dwellings than that envisaged as part of the adopted Local Plan.

Land at Lower Chase Road has no significant constraints to development and could deliver the full 40% affordable provision (about 36 dwellings), thereby meeting the shortfall in affordable housing delivery at Morgan's Yard and making a meaningful contribution towards affordable housing provision in the District.

It should be noted that the affordable housing at Morgan's Yard was an identified requirement for Waltham Chase that was envisaged to be catered for in a plan-led manner, and will not be met (and existing deficiencies will be exacerbated) unless new housing for the scale envisaged at Lower Chase Road is delivered in the village.

We note that that previous comments from members of the Parish Council in their response to the nomination of sites (Appendix 2 of the Development Strategy and Site Selection Background Paper, 2022) in relation to Land South of Lower Chase Road included "a. This would allow development at the outer edges of the Parish b. Not sewerage issues that are known at that end of the Parish c. Clear access onto the main highway d. Services nearby e. Joins up with other development behind (mushroom farm and Forest Gardens)" and "Based on WCC Numbers and Hierarchy, 1st choice".

Furthermore, Bargate Homes has a track record of successfully delivering high quality housing developments within Waltham Chase. Bargate are proud to have worked collaboratively with Winchester City Council, Shedfield Parish Council, and the local community from site selection stage through to the planning applications and the delivery of their developments at Forest Road. Their Hawthorn Grove development provides a unique opportunity for Land South of Lower Chase Road to be accessed from this built development (via the existing access onto Forest Road) rather than from Lower Chase Road, as a final phase of development rounding off the settlement edge. It should therefore be allocated for the development of about 90 dwellings.

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

Waltham Chase should be categorised as a larger rural settlement and Land South of Lower Chase Road (ref. SH11) should be allocated for 90 dwellings. The Policies Map should also be amended to show the allocation of SH11.

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

A new allocation for Land South of Lower Chase Road (ref. SH11) should be added to the larger rural settlements grouping of allocations within the MTRA section of the Plan (starting at pg. 386). The table on pages 389 and 390 should be updated accordingly. Paragraph 14.189 should be deleted, and a new paragraph introduced to state that Land South of Lower Chase Road has been allocated for the development



of 90 dwellings. The table 'Waltham Chase Housing Sources' on pg 497 should be amended to include the new allocation at Lower Chase Road.

*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)*

X      *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*

## **Evidence Base**

### **Settlement Gap Review 2024**

As set out in our comments on site allocations in Waltham Chase, the Gap Review has a number of failings and does not follow best practice.

Firstly, it does not appear that the Gap Review has been informed by site visits. This is critical to ensure a full appreciation of the contribution that land parcels make to the Gap and to allow for a full assessment against the relevant criteria.

Secondly, the Settlement Gap Review (July 2024) fails to consider if all of the land within the Waltham Chase to Swanmore Gap is necessary to prevent the coalescence of the settlements, having regard to maintaining their physical and visual separation, as per Partnership for South Hampshire guidance 'Policy Framework for Gaps' (2008).

We contend that it is not necessary to include SH11 within the gap. Indeed, paragraph 4.10 of the Settlement Gap Review states "The following features are important in retaining a sense of separation between Waltham Chase and Swanmore:

- Tree cover that limits the visual impact of development in the settlement gap.
- The retention of field boundaries and agricultural land use.
- The avoidance of further infilling of development along connecting roads."

In respect of tree cover, no trees would need to be removed to bring forward SH11 and additional trees would be planted as part of a comprehensive landscaping scheme. Whilst the land use would change from agricultural to residential, the scheme could be designed in a sympathetic manner, retaining existing field boundaries. The development would represent a rounding off of the settlement rather than infilling.

As such, SH11 would not conflict with the identified important features of the gap and should not constitute a reason for discounting it as an allocation.

Additional evidence is required in the form of a comprehensive Gap Review, in line with best practice.

### **Settlement Hierarchy Review 2024**

There are a number of issues with the latest SHR and its revised methodology, which fail to properly acknowledge the range of services and facilities in Waltham Chase.

Firstly, whilst we note that the 2024 update acknowledges that the village post office has now re-opened, an extra point should be applied to recognise that it is open more than five days a week, as per the scoring in the 2021 SHR.

Secondly, the SHR continues to group churches, pubs, village halls and cafe/restaurants into a single category 'Facility for Community to Congregate'. We do not accept the Council's response that "there is enough scope for these facilities to be used in more than one way – for instance, cafes in village halls - to justify their grouping together as one common function". Each of these facilities serves its own purpose, rather than just as a place to congregate. If a resident does not have access to one of these facilities, they are more likely to travel elsewhere rather than to one of the other facilities within the group. By grouping them together the

SHR fails to recognise this important point. The SHR should be amended to apply a score to each of these facilities present in the settlement, as per the 2021 SHR. Waltham Chase benefits from all such facilities and its scoring should be increased from 2 to 4.

Thirdly, the SHR is a crude tool for assessing the sustainability of a settlement. For example, Waltham Chase lies within walking distance of Swanmore, with Swanmore College lying within 800m of the settlement. The SHR fails to allow for such circumstances as it focuses on services and facilities within the subject settlement.

The revised scoring for Waltham Chase highlighted above would increase its score from 20 to 23 points. This is above the threshold for the 'larger rural settlements' tier.

For all of the above reasons, the 2024 SHR should be revised, and Waltham Chase should be re-instated as a 'larger rural settlement' within the settlement hierarchy.

### **Development Strategy and Site Selection 2024**

Please see our comments in respect of the Integrated Impact Assessment (IIA) as these overlap and relate to both the IIA and the Development Strategy and Site Selection.

### **Integrated Impact Assessment 2024**

The Development Strategy and Site Selection 2024 paper does not identify any new allocations at Waltham Chase, which is reflected in the Draft Plan whereby the current, adopted Local Plan allocation at Morgan's Yard is carried forward (WC1). This is on the basis that ""However, given the constraints around the village, particularly the narrow settlement gap with Swanmore, and the substantial level of allocated land remaining to be developed, no new sites are allocated in this Plan." As set out elsewhere in these representations, it is considered that the spatial distribution of housing across the District is imbalanced. Accordingly, it is considered appropriate to consider which of the available sites should be considered to address this deficiency.

Bargate Homes' site at Land South of Lower Chase Road, Waltham Chase (SH11) scored equivalent to WC1 in its overall score against the 11 objectives within the DSSS/IIA and on that basis there is no reason that it should not be allocated to rebalance the housing need across the District. Indeed, upon further scrutiny of the site assessment for SH11, it is clear that it's scoring should be increased, such that it performs more favourably than WC1, as set out below.

We note that the site assessment for SH11 within the IIA report (Appendix F, pg's 803-805) scores SH11 as 'minor negative' against IIA objectives 1 (climate change), 2 (travel and air quality) and 7 (access to services/facilities/jobs) and that part of the justification is that the site is ""not within 2,000m of a secondary school". The site lies to the east of Waltham Chase and is within 500m of Swanmore College. This was raised in our representations on the Regulation 18 Plan. However, the 2024 IIA still states that the site is not within 2,000m of a secondary school. This is factually incorrect and should be amended. This element of the site assessment should also be revised to score 'major positive', in recognition of the site's close proximity to this important local facility.

Furthermore, the IIA objectives 1d and 1e only assess distances to town, district and local centres. This approach ignores proximity to the centre of Waltham Chase which, as we have set out in our response to the Settlement Hierarchy Review, should be re-instated as a 'larger village' given the range of services and facilities it has to offer. Indeed, paragraph D.53 of the IIA Report Appendices recognises the important role Waltham Chase has to play, stating "Beyond the Winchester Town the eight larger settlements of the District (Bishop Waltham, Colden Common, Denmead, Kings Worthy, New Alresford, Swanmore, Waltham Chase and

Wickham) provide a focal point for their own communities. They also provide some services for nearby smaller villages.”

The IIA site assessment scoring should be revised to take into account the distance of potential site allocations to larger village centres. In the case of SH11, this site is the closest site to Waltham Chase centre of those identified in the SHELAA, lying approximately 130m from the crossroads at the centre of the village where the convenience store/post office and hairdressers (which has replaced the bike shop) are located. As set out in the Transport Advice Note submitted in support of these representations, pedestrian and vehicular access can be provided through Bargate’s Hawthorn Grove development to the south, linking to the bus stops on Forest Road (which provide services to destinations including Bishops Waltham, Botley, Hedge End, Wickham, Winchester, Fareham, Eastleigh (including Barton Peveril College) and Havant (including Havant and South Downs College)) and services in the village.

Taking all of the account all of the above, the scoring for SH11 against IIA objectives 1, 2 and 7 should be revised so that it scores at least ‘minor positive’ to reflect its location close to both the centre of Waltham Chase and Swanmore College.

The IIA explains that, in scoring sites against IIA objective 8 (supporting the sustainable growth of the district’s economy) effects for all residential sites are uncertain, given that they are based on information provided by site promoters on the call for sites forms as these forms have not always been completed by site promoters to the same level of detail. However, where sites are clearly greenfield (such as SH11) surely the uncertainty can be removed. SH11 should be scored at least ‘negligible’ rather than ‘negligible uncertain’.

We question the approach taken to assessing sites against IIA10 (landscape), which lacks transparency. For example, SH11 is a 4ha site adjoining the settlement policy boundary of Waltham Chase and bounded by existing residential development to the south and west, with hedgerows and trees on its eastern and northern boundaries. It is assessed as ‘minor negative uncertain’. SH14 (Raglington Farm, Botley Road, Shedfield) is a 153ha site, remote from any defined settlements on exposed rising land. However, it is assessed as performing better than SH11 in landscape terms, scoring ‘negligible uncertain’. The scoring for SH11 should be revised to be ‘negligible uncertain’ or better.

On the basis of the assessment above, and as summarised in Table 1 below, SH11 can be considered to score well in respect of objectives IIA1 (climate change), IIA2 (reducing the need to travel), IIA4 (health and welling being), and IIA7 (access to services). The site is well located closer to the centre of the village than any other site in the SHELAA and within walking distance of both Swanmore College and St John the Baptist Primary School, meaning it could support the sustainable growth of the economy (IIA8), and has limited ecological value and is visually well contained (IIA9 and IIA10). It has no heritage constraints (IIA11), would be an efficient use of available land close to existing services (IIA12) and has no negative impact on water resources or flood risk (IIA13 and IIA14).

**Table 1: Comparison of IIA and Pegasus Group Site Assessment Scoring for SH11**

<b>IIA Objective</b>	<b>IIA Scoring</b>	<b>Pegasus Group Scoring</b>
IIA1: climate change mitigation	Minor negative (-)	Minor positive (+)
IIA2: travel and air quality	Minor negative (-)	Minor positive (+)
IIA4: health and wellbeing	Minor positive (+)	Minor positive (+)
IIA7: services and facilities	Minor negative (-)	Minor positive (+)
IIA8: economy	Negligible uncertain (0?)	Negligible (0)
IIA9: biodiversity and geodiversity	Significant negative (--)	Significant negative (--)
IIA10: landscape	Minor negative uncertain (-?)	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 such, SH11 is extremely well positioned to provide the additional housing needed within Waltham Chase. Indeed, when Pegasus Group presented our Vision Document for SH11 to Shedfield Parish Council in 2022, they commented that, should there be a need for allocations in Waltham Chase, they would not object to SH11 being selected.