

**Winchester District Local Plan 2020-2040: Regulation 19 Consultation  
 Representations – Taylor Wimpey Strategic Land  
 Field Farm, Swanmore**

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)*

The housing requirement set out by Policy H1 should be a minimum figure to be achieved to support the Government objective as set out in the NPPF of significantly boosting the supply of homes. The Local Plan period should also be extended by at least 4 years as the current base date for the Plan is 2020. It will be five years old already when it reaches Examination. The Council states this is to take account of past higher delivery rates but this will mean that there will be less than 15 years of the Plan left at adoption date and it therefore doesn't Plan far enough forward to ensure that housing needs will be met in a sustainable way.

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). My client's land at Field Farm, Swanmore, referred to as 'Land at Swanmore Road' in the Council's evidence base (ref. SWA10), is free from any significant constraints and should be allocated for residential development to help meet housing needs.

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.

In addition, there is no detailed housing trajectory included in the Local Plan. It is not clear what sites are expected to be delivered and when and without this it is not clear what sites the Council are relying on to maintain a housing land supply.

Given that the Council's annual housing requirement is likely to be more than 200 dwellings below the relevant published Local Housing Needs figure, the draft NPPF (July 2024) sets out a requirement to commence plan making in the new plan making system at the "earliest opportunity".

A commitment to the commencement of the preparation of a new Plan under the new plan-making system at the earliest opportunity should therefore be included within the Draft Local Plan and a policy should be included to that effect.

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

Policy H1 should be amended to make it clear the housing requirement is a minimum and 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.

Land at Field Farm, Swanmore (SWA10), should be allocated for residential development to help meet some of this requirement.

The Council should also include a more detailed housing trajectory in the Plan.

A new policy should be included to set out the Council’s commitment to a commencing the preparation of a new Plan under the new plan-making system at the earliest opportunity. We would welcome the opportunity to discuss appropriate timescales for the preparation of the new Plan at the Examination hearing sessions

*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)*

Taylor Wimpey Strategic Land (TWSL) 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 Draft 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.

An increase in the housing requirement of the MTRA’s as a result of increasing the Plan period, accounting for unmet needs and a suitable buffer (see out comments in relation to Policy H1) 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. This needs to be taken account in terms of when it is realistic for these sites to start delivering, and as a result the Council should look to allocate further medium sized developments to deliver early in the Plan period.

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.

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, with Swanmore moving up the hierarchy – we support this.

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.

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 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 that a new greenfield allocation of land for 225 homes at Land at Field Farm, Swanmore (ref. SWA10) is included in the Plan.

As set out elsewhere in these representations, site SWA10 scored equivalent to, or better than the other five sites considered for allocation in Swanmore within the Integrated Impact Assessment (IIA). SWA10 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. As such, it should be allocated for

development to help address the imbalanced distribution of housing across the District identified above and the higher overall housing requirement (see comments in relation to Policy H1), 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. 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 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. Land at Field Farm, Swanmore (SWA10), should be allocated for residential development to help meet some of this requirement.

*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 SW1 – The Lakes**

*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)*

Swanmore has been recategorised as a ‘larger rural settlement’ which we fully support. It is a sustainable settlement for new housing with a range of services and facilities. However, no new allocations are proposed and the overall housing requirement is just 164 dwellings which is significantly lower than all other larger rural settlements. Instead, an historic allocation from the adopted Local Plan known as ‘The Lakes’ has been rolled forward into the new Plan under Policy SW1 for ‘about 100 homes’.

The Development Strategy and Site Selection Paper (DSSS) 2024 states at paragraph 6.38 “There is a substantial amount of land still to be developed from allocations in the previous adopted Local Plan. Therefore it is not considered appropriate to allocate sites for further development, given the constraints around this location and that the overall level of housing need can be met at other locations.” However as Swanmore was incorrectly identified in a lower settlement category at the Regulation 18 stage no further housing was proposed. This has now been corrected in the Regulation 19 Plan, however no further assessment of sites suitable for allocation appears to have taken place. There is acknowledgement that Swanmore is suitable for further development which will support its position in the settlement hierarchy and as such should be allocated further housing.

Paragraph 6.37 of the DSSS suggests that the principal constraints are the presence of the South Downs National Park (SDNP) to the immediate north and east of Swanmore and settlement gap to the south and south and west. We agree that the SDNP is a significant constraint to development and, as such, sites on the northern and eastern boundaries of the settlement are inappropriate for development.

However, we do not agree that the settlement gap has been appropriately considered, for the reasons set out below.

It should be noted that the adopted Local Plan Part 2 allocated development on the southern side of Swanmore within what was gap at that time, demonstrating that the removal of land from this part of the gap was acceptable. Policy SW1 carries forward development within this location in the Draft Plan.

My clients land at Swanmore Road (SWA10) lies on the western side of Swanmore and is entirely contained within existing field parcels which benefit from boundary vegetation including hedgerows and trees. As such it is already visually well contained. Furthermore, SWA10 could be developed with an enhanced landscape buffer along its western and southern boundaries, such that the extent of built development would not extend materially further west/south into the gap than the existing development on Swanmore Road or Lower Chase Road. This would allow for a logical rounding off of the settlement. The development would

be perceived as a modest extension to Swanmore. As such, the function of the gap and the separate identities of Swanmore and Bishops Waltham would not be undermined.

The Settlement Gap Review (July 2024) fails to consider if all of the land within the Swanmore to Bishops Waltham 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 SWA10 within the gap. Indeed, paragraph 4.9 of the Settlement Gap Review states "The following features are important in retaining a sense of separation between Bishop's Waltham and Swanmore:

- Maintenance of the gap between the edge of Swanmore and the cluster of buildings that includes Hoe Farm, so that the rural character of the latter is retained."

The Gap Review does not explain the significance of the cluster of buildings that includes Hoe Farm. Nonetheless, there is a large field parcel and a road (Paradise Lane) lying between this group of buildings and SWA10, with boundary vegetation along the boundaries of the field parcel. It is considered that that SWA10 could be developed with a comprehensive landscaping scheme to ensure that the rural character of the cluster of buildings to the west would be maintained.

As such, SWA10 would not conflict with the identified important features of the gap and should not constitute a reason for discounting it as an allocation or for including in the gap.

The second reason given for the lack of new allocations at Swanmore is that there is a "substantial level of allocated land remaining to be developed". This refers to Allocation SW1 'The Lakes', which was allocated for about 140 dwellings in the LPP2 in April 2017. However, this approach of rolling forward historic Local Plan allocations fails to positively plan for the future of Swanmore.

As set out in our representations on Policy H1 and H3, there is a need to increase the amount of development in the MTRA to ensure that the rural settlements maintain their vitality and viability. Swanmore has been recognised as a higher order settlement in the MTRA hierarchy given the level of services and facilities on offer.

Taylor Wimpey has a track record of successfully delivering high quality housing developments within the area. Their site at Swanmore Road is free from any significant constraints and should therefore be allocated for the development.

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

Land at Swanmore Road, Swanmore (ref. SWA10) should be allocated for residential development. The Policies Map should also be amended to show the allocation of SWA10.

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

A new allocation for Land at Swanmore Road, Swanmore (ref. SWA10) for about 225 dwellings 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 14.99 should be amended to refer to a capacity of about 385 dwellings and the table 'Swanmore Housing Sources' on pg 447 should be amended to include the new allocation at Land at Swanmore 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 Swanmore, 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 Bishops Waltham 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 SWA10 within the gap. Indeed, paragraph 4.9 of the Gap Review states: "The following features are important in retaining a sense of separation between Bishop's Waltham and Swanmore:

- Maintenance of the gap between the edge of Swanmore and the cluster of buildings that includes Hoe Farm, so that the rural character of the latter is retained."

The Gap Review does not explain the significance of the cluster of buildings that includes Hoe Farm. Nonetheless, there is a large field parcel and a road (Paradise Lane) lying between this group of buildings and SWA10, with boundary vegetation along the boundaries of the field parcel. It is considered that that SWA10 could be developed with a comprehensive landscaping scheme to ensure that the rural character of the cluster of buildings to the west would be maintained.

As such, SWA10 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**

We support the recategorisation of Swanmore as a larger rural settlement within the Settlement Hierarchy Review (SHR) 2024. This now correctly recognises that the level of services and facilities on offer within the settlement and confirms that it represents a sustainable location for new development. This includes a primary school, secondary school, large commercial and employment area, daily bus service, post office, public houses, church, recreational facilities including children's play equipment, hairdresser and convenience store.


### **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 Swanmore, which is reflected in the Draft Plan whereby the current, adopted Local Plan allocation at ‘The Lakes’ (Policy SW1) is carried forward. This is on the basis that there are “... Constraints around this location and the overall level of housing need can be met at other locations”. As set out elsewhere in these representations, it is considered that the spatial distribution of housing across the District is imbalanced and the level of provision should be increased. Accordingly, it is considered appropriate to consider which of the available sites should be considered to address this deficiency.

TWSL controls Land at Field Farm, referred to as ‘Land at Swanmore Road’ in the SHELAA (ref. SWA10). The site scores equivalent to, or better than the other five sites considered in the Integrated Impact Assessment (IIA). It is however, considered that the site should score higher on a number of criteria. In the first instance, the site is just 224m from the recreation ground, 570m from Swanmore College, 352m from Swanmore Primary School, 340m from the local shop and 110m from a bus stop. By comparison, the other sites considered within the assessment are, on average, located further away from the key facilities within the village with SWA10 (Field Farm) scoring best on 3 out of 5 measures of sustainability as contained in the table below. It scores 2nd on one of the remaining two measures meaning that, on average, it scores highly from a sustainability point of view. Accordingly, it is entirely appropriate for SWA10 to score better on objective 1 (climate change) and 2 (reducing the need to travel).

	Distance to Swanmore recreation ground (as crow flies)	Distance to Swanmore College (Secondary) (as crow flies)	Distance to Swanmore Primary School (as crow flies)	Distance to local shops (as crow flies)	Distance to bus stop (as crow flies)	
Site ref. 						
SWA08	233m	332m	479m	500m	348m	
SWA09	392m	110m	715m	662m	111m	
SWA14	820m	792m	943m	920m	400m	
SWA17	275m	415m	496m	539m	367m	
SWA20	528m	690m	619m	703m	0m	
SWA10 (Field Farm)	224m	570m	352m	340m	70m	

On the basis of the assessment above, SWA10 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 existing services and facilities than other sites considered, 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 will have no negative impact on water resources or flood risk (IIA13 and IIA14). As such, SWA10 is extremely well positioned to provide the additional housing numbers required as an allocation within the emerging Plan.