

# **Winchester District Local Plan Review**

## **Analysis of Representations on the Deposit Plan**

### **CHAPTER 2: STRATEGY**

**Summary of Representation.**  
***Change sought.***

**City Council's Response to Representation**  
***Change Proposed***

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#### **Issue 2.1** **Paragraphs 2.1 - 2.15**

**Representation:**

**Sparsholt College (353/1)**

Generally support the Local Plan Strategy, as expressed in paragraph. 2.15, together with the arrangements and in paragraphs 2.1 -2.15.

***Change sought - none.***

**GOSE (261/5)**

Paragraph 2.6, fails to take proper account of the wider regional and sub-regional context and the vision, key development principles and core strategy for the region, contained in RPG9.

***Change sought - not specified.***

#### **City Council's Response to Representation**

The support is welcomed.

The Government Office's comment is noted but it is not considered necessary or appropriate for the Local Plan to attempt to repeat or summarise what RPG9 says about the wider regional and sub-regional context. RPG9 is referred to in several parts of the Local Plan and is a published document that can be readily consulted. Further reference to it would merely add to the bulk of the Plan without adding significant benefit.

***Change Proposed – none.***

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#### **Issue 2.2** **Paragraph 2.7**

**Representation:**

**Cala Homes (South) Ltd (468/1)** Object to the use of the phrase “the possibility of a further major development area at Winchester City (North)” in paragraph 2.7. The Hampshire County Structure Plan (Review) requires the Local Plan to identify an appropriate site for major development area at Winchester City (North).

***Change sought - not specified.***

#### **City Council's Response to Representation**

The Deposit Local Plan identified an “area of search” for a reserve Major Development Area at Winchester City (North), in line with the requirements of the County Structure Plan (Review). Nevertheless, because this is a ‘reserve’ site, it is at present no more than a “possibility”. If regional housing requirements and the results of monitoring the supply of housing indicate a shortfall in provision, the strategic planning authorities may decide that the site should be brought forward, but for the time being the Plan's description is considered appropriate.

***Change Proposed - none***

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#### **Issue 2.3** **Paragraphs 2.10 - 2.11**

**Representation:**

**Berkeley Strategic Land (Ltd) (210/1)**

Object to paragraph 2.10 which states that a “local emphasis” has been put on Government and Structure Plan strategies. The Plan should not depart from the site search sequence set out in government guidance and the Structure Plan.

***Change sought - amend strategy to accord more closely with Government***

#### **City Council's Response to Representation**

Current Government advice clearly stipulates a “sequential approach” and this is fully recognised and accepted in the Plan's strategy. Government advice also indicates that development requirements should be met, firstly, by making the best use of land within the built-up areas and that this should precede the release of any new “green-field” sites. The summary of these requirements could be slightly improved, as suggested by respondent 138, but it is not considered that paragraph 2.19 needs to be amplified as suggested by this respondent.

In placing these issues in their local context by referring to “local circumstances”, the Plan explains the largely rural nature of the District. As well as having no large areas which require regeneration there are areas within the settlements which have

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*advice.*

#### **J Hayter (138/18)**

The description of the 'sequential approach' is not correct and any departure from Government and Structure Plan policies should be identified and justified on a case by case basis.

***Change sought*** - detailed wording changes to paragraphs 2.10 and 2.19 suggested, the last sentence of paragraph 2.10 should be deleted or amended.

#### **Estates Practice, HCC (1434/5)**

To provide more flexibility without compromising the overall objective that the majority of early-release sites should be 'urban capacity' sites, the Plan should adopt a "phasing approach".

***Change sought*** - not specified.

#### **Holmes & Sons (287/14)**

Object to the omission of meeting the Structure Plan housing requirement as a 'key principle'.

***Change sought*** - Add new bullet point to paragraph 2.11 referring to the need to meet the Structure Plan's housing provision for the District of 7295 dwellings by March 2011.

not previously been developed, just as there are previously developed areas of land which are situated well away from any settlement. The Plan also accepts the Government stipulation that development plan should have regard to current national policies and that a local plan must be in "general conformity" with the Structure Plan. Nevertheless, it is considered that a local emphasis is quite appropriate, insofar as it is necessary to consider the characteristics and composition of the District and its settlements. This does not imply any deviation from Government guidance or Structure Plan policies, nor that departures from the Local Plan's policies are being encouraged. Some wording changes are proposed to improve the way this section is expressed.

There is a degree of flexibility in the Plan and existing development commitments are generally carried forward. Most of these have planning permission and the scope for phasing them is therefore very limited. It is, however, appropriate that these should be re-assessed on the basis of more recent Government and strategic policies.

The suggestion that paragraph 2.11 be amended to include details of the Structure Plan (Review) housing requirement as a "key principle" is noted. However, the principles listed at paragraph 2.11 are a summary of the key outcomes of the "Help Shape Winchester District" public consultation exercise, which has helped to inform the production of the Plan. The need to comply with this target is in fact already one of the Local Plan strategy's objectives (paragraph 2.18) and is also detailed in Proposal H.1 of the Plan.

#### ***Change Proposed - paragraph 2.10:***

*....This includes ~~means~~ making best use of land within built-up areas, including reassessing the development capacity of sites already allocated for development, before releasing new greenfield sites..... The Local Plan, therefore, ~~applies a local emphasis to interprets~~ Government and Structure Plan strategies so as to, ~~ensuring they are~~ ~~it is~~ relevant to the District's circumstances and needs.*

### **Issue 2.4** **Paragraph 2.15**

#### **Representation:**

#### **Shedfield Society (1439/1)**

Support the aims of the strategy. However, planning control has failed to protect the countryside from inappropriate development and "green-belt" status is needed.

***Change sought*** - not specified.

#### **Compass Roadside Ltd (206/2) Support**

### **City Council's Response to Representation**

The support is welcomed.

Whilst the respondent's concerns about the alleged failure of planning policies to protect the countryside are noted, the Local Plan cannot designate Green Belts. This is a formal planning designation, which must be brought forward through the structure plan process. In fact a Green Belt was proposed in Southern Hampshire in the original Hampshire County Structure Plan but this was rejected following the Examination in Public.

Respondent 206 operates service areas at Sutton Scotney (A34) and West Meon (A32). Whilst these facilities are now well established it is not considered appropriate for the Plan's overall aim, as set out in paragraph 2.15, to refer to something as specific

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the overall aims of the strategy but paragraph 2.15 should be expanded to recognise the need to provide suitable facilities at motorway, trunk road and roadside areas.

***Change sought*** - expand paragraph 2.15 to refer to "the safety of all transport users on the national and local transport network".

as the safety of transport users. If such a reference is needed it would be more suitably dealt with in the Plan's Transport Chapter. The respondent has made detailed suggestions for changes to the Transport Chapter, which are considered under that heading. It should, however, be pointed out that, although the respondent describes the facility at West Meon as a trunk road service area, neither the A32 nor A272 are designated as trunk roads.

***Change Proposed*** – none.

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#### **Issue 2.5** **Paragraph 2.16**

#### **City Council's Response to Representation** The support is welcomed.

##### **Representation:**

##### **Compton & Shawford Parish Council (276/1)**

Welcome the overall aim and objectives of the Review, as set out in paragraphs 2.15 & 2.16.

***Change sought*** - none.

The Plan's 'design-led' objective is applicable to all instances of new development. However, it will always be necessary to consider all relevant policies of the Plan and other material considerations in dealing with planning applications. Nevertheless, it is considered entirely appropriate that the Plan aims to conserve and enhance the character of the District and that its strategy should refer to the promotion of a design-led approach to development to help achieve this.

***Change Proposed*** – none.

##### **Shedfield Society (1439/2)**

Support the aims of the strategy (subject to the concerns noted at Issue 2.4 above).

***Change sought*** - none.

##### **Sparsholt College (353/2)**

Accept the need to conserve and enhance the District and that, where possible, a design-led approach to new development should be promoted. However, other considerations such as economic decisions, fitness for purpose and utility may be more important than the design-led approach.

***Change sought*** - change the 'design-led' principle to recognise it may not necessarily be overriding.

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#### **Issue 2.6** **Paragraph 2.17**

#### **City Council's Response to Representation**

##### **Representation:**

##### **Bewley Homes (386/1)**

A design-led approach to new development will only avoid harmful over-development in certain distinctive localities if a protective policy, similar to Proposal EN.1 in the Current WDLP, is also applied in such areas.

Applying the urban-centred principles contained in Government advice and Regional Planning Guidance to new development in the built-up areas and, in particular, those subject to Proposal EN.1 in the current District Local Plan, will inevitably involve some degree of change. This is not least through the application of densities which are necessarily higher. However, the design-led approach embedded in the Review Plan is specifically intended to address and anticipate the needs and pressures that higher density development will bring. It also focuses on local characteristics and qualities, of the type which were identified in Proposal EN.1 and seeks to secure their conservation by incorporating them within new development proposals.

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#### **City Council's Response to Representation *Change Proposed***

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***Change sought*** - reintroduce a policy such as EN.1 following a reappraisal of areas it applied to.

**Bryant Homes Ltd (397/1)**

A design-led approach to new development will only avoid harmful over-development in certain distinctive localities if a protective policy, similar to Proposal EN.1 in the Current WDLP, is also applied in such areas. The alternative is that urban capacity expectations should be reduced.

***Change sought*** - reintroduce a policy such as EN.1 following a reappraisal of areas it applied to or accept that housing capacity needs to be increased by making new allocations.

Such an approach is intended to apply to all development and all parts of the District and not be confined, somewhat arbitrarily, to designated areas. A more detailed response in relation to representations about Proposal DP.3 and suggestions that EN.1 should be reintroduced is contained in the section dealing with representation on Chapter 3, Design and Development Principles. So far as the Local Plan's strategy is concerned, the principle of promoting a design-led approach is considered appropriate.

***Change Proposed – none.***

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#### **Issue 2.7** **Paragraph 2.19**

##### **Representation:**

**Berkeley Strategic Land Ltd (210/2)** It is not Government policy only to direct development to existing settlements. Where previously developed land in urban areas performs badly on sustainability criteria urban extensions should be considered.

***Change sought*** - amend paragraph 2.19 to reflect Government policy.

**Holmes & Sons (287/13)**

Object to the omission of a 'sequential' approach in paragraph 2.19, which is inconsistent with PPG3, the Hampshire County Structure Plan (Review) and paragraph 2.24.

***Change sought*** - amend paragraph 2.19 first sentence to reflect PPG3 and Structure Plan.

##### **City Council's Response to Representation**

The Local Plan's key objectives, which specifically include pursuing a "sequential" approach, are already set out immediately preceding paragraph 2.19. The implications of this approach for the sequence of preferred development are set out in the Plan's Glossary of Terms.

The Plan reflects the conclusion that, in general terms, concentrating development in existing settlements performs better in sustainability terms and against other policy objectives than promoting urban extensions. Nevertheless, urban capacity is not likely to meet all of Hampshire's needs for housing and several Major Development Areas are promoted as large urban extensions. The sequential approach is, therefore, being applied by the Structure Plan and is reflected in the Local Plan.

It is not considered appropriate, therefore, that the Plan should encourage the provision of urban extensions when it has been concluded that this is not needed in order to satisfy the development requirements of the County Structure Plan (Review). A detailed assessment of housing requirements and supply is set out in response to the objections to the Housing Chapter.

***Change Proposed – none.***

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#### **Issue 2.8** **Paragraph 2.20**

##### **Representation:**

**Berkeley Strategic Land Ltd (210/3)** The Urban Capacity Study does not follow Government guidance and over-estimates

##### **City Council's Response to Representation**

The Winchester District Urban Capacity Study is not intended to be prescriptive about every development opportunity that may arise in the District over the Plan period. Nor can it be expected to predict the precise incidence or rates of new development. However, it does provide strong evidence to demonstrate that the numbers and development potential of the sites identified as being 'good opportunity sites' are sufficiently unconstrained to be able to meet the development requirements of the Structure Plan

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the extent to which development requirements can be met from the existing defined urban areas. An independent urban capacity study has been undertaken which shows a significantly lower capacity.

***Change sought*** - revise the housing strategy to accept that a corrected urban capacity study would require urban extensions to be released.

#### **Cala Homes (South) Ltd (268/2)**

The Urban Capacity Study only provides an indication of the maximum number of dwellings that may come forward in the plan period, not the number that will occur.

***Change sought*** - allocate other sites to provide for any potential shortfall.

#### **Holmes & Sons (287/12)**

Object to the assumption that Structure Plan requirements can be met in existing built-up areas.

***Change sought*** - rephrase first sentence of paragraph 2.20 to replace "can be met" with "may be met".

#### **Bewley Homes (386/2)**

Many of the urban capacity sites identified as 'good opportunities' are flawed for various reasons.

***Change sought*** - identify additional 'greenfield' sites to deal with the shortfall in housing land supply.

#### **Sparsholt College (353/4)**

Object to the application of the sequential approach primarily in existing built-up areas. Limited development could be consistent with other policies in places such as Sparsholt College if 'defined settlement' status is applied.

***Change sought*** - acknowledge that infilling on greenfield sites may be appropriate in defined settlements.

**Estates Practice, HCC (1434/6)** Whilst existing built-up areas represent a useful starting point, the Local Plan should also recognise previously developed land and buildings which are situated in close proximity to these settlement areas.

***Change sought*** - not specified.

(Review).

It is inevitable that sites that are not identified will come forward, as is already happening, and some identified sites may not be implemented. The sites identified are not a maximum level of potential as other sites can be permitted. Indeed there are many 'medium' and 'poor' sites which may be developed in addition to the identified 'good' opportunities. The exclusion of these sites from the estimates shows that the figures have been discounted. The housing supply from urban capacity sites will be supplemented by existing commitments and allocations, which include greenfield sites, such as the MDA. The Plan therefore envisages housing development taking place on a range of types of sites.

The urban capacity and development potential in the built-up areas is subject to regular monitoring. The extent to which urban capacity sites are coming forward will be a key factor to be monitored. If necessary, constraints on development may need to be reviewed or additional positive action taken to enhance and deliver certain development opportunities within the settlements.

The results of monitoring and updating the Urban Capacity Study are set out in full, along with responses to other housing issues, in the section on the Housing Chapter of the Plan.

Respondent 210's urban capacity work has not been made available to the Council so it is not possible to comment on it. The updated work on the Winchester District Urban Capacity Study indicates that its estimates are not over-optimistic and that housing requirements can continue to be met in existing built-up areas (with the exception of the MDA). It is not, therefore, necessary to consider extending settlement boundaries.

Nor is it appropriate to consider housing development in isolated locations which are separate from any significant settlement such as Sparsholt College.

***Change Proposed – none.***

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***Change Proposed***

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**Issue 2.9**  
**Paragraphs 2.21 - 2.28**

**City Council's Response to Representation**

The support is welcomed.

**Representation:**

***Change Proposed – none.***

**Sparsholt College (353/5)**

Support the strategy's policies for "development which meets local needs", "sustainable development" and the "protection of rural character"(2.21-28), although the College's ability to support such aims could be compromised if unable to properly utilise its site.

***Change sought - none.***

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**Issue 2.10**  
**Paragraph 2.22**

**City Council's Response to Representation**

The Plan does encourage improved recreational provision in all the settlements where it is needed. Where necessary allocations of land for recreational purposes are made, in accordance with the Local Plan's recreation space standards. These allocations seek to address particular deficiencies in recreational land in Winchester and other settlements by making specific allocations of land for this purpose, adjacent to the settlements concerned. It is not accepted that urban extensions would be the only satisfactory means of providing facilities to meet anticipated demand from within the urban areas, in addition to satisfying present shortfalls in provision. Proposals RT.1 and RT.2 in the Plan's Recreation and Tourism Chapter make it clear that existing recreational space of any significant value must be retained for this purpose and that any loss of such space would be resisted. Also, it would not necessarily be appropriate to expect the developers of any urban extensions to address existing shortfalls in any development allocations.

**Representation:**

**Berkeley Strategic Land Ltd (210/4)**

There is no strategy to address the serious deficiencies in recreational land, especially in the larger settlements. The strategy of concentrating housing within existing settlements will exacerbate the problem.

***Change sought - include provision for urban extensions so as to enable shortfalls of social and community facilities to be addressed.***

***Change Proposed – none.***

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**Issue 2.11**  
**Paragraph 2.24**

**City Council's Response to Representation**

The support is welcomed.

**Representation:**

**Shedfield Society (1439/3)**

Support the aims of the strategy set out in paragraph 2.24 (subject to the concerns noted at Issue 2.4 above).

***Change sought - none.***

The Plan's strategy at paragraph 2.24 makes it clear that a sequential approach to locating development is being adopted. The Major Development Areas are clearly intended as urban extensions, not free-standing new settlements, and the Local Plan aims to implement this intention through the design of the MDA. In Winchester District the MDA is significant component in the overall housing requirement but this development is a requirement of the Structure Plan.

**Berkeley Strategic Land Ltd (210/5)**

West of Waterlooville MDA can only be regarded as a new settlement, which PPG3 suggests perform worse in terms of sustainability than urban extensions.

Paragraph 2.24 also emphasises other key aims, including the need to avoid the unnecessary loss of countryside, to define clear limits to the settlements and to avoid harmful development which would undermine the character and quality of the countryside, towns and villages. As part of the sequential approach the Plan

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While MDAs are required by the Structure Plan, the residual housing requirement should be met, firstly, within the urban areas and then by additional urban extensions.

***Change sought*** - the strategy should be amended to properly reflect Government advice.

puts forward detailed policies to ensure that development needs are met from within the District's defined built-up areas and, therefore, achieve a more effective, efficient and sustainable use of land.

Urban extensions are not excluded from the Local Plan's strategy and several of the commitments and allocations included in the Plan are of this type, including the MDA. However, it is clear that greenfield urban extensions should not be released if there are appropriate urban capacity opportunities available. The Plan demonstrates that there are such opportunities.

***Change Proposed – none.***

#### **Issue 2.12** **Paragraph 2.25**

##### **Representation:**

##### **Thompson Bros. (Esher) Ltd (290/1)**

The terms 'essential' and 'inappropriate' development have a particular planning meaning related to Green Belts and their use in other contexts can be confusing.

***Change sought*** - amend to read "development which is unsuitable in the context of the relevant policies".

#### **City Council's Response to Representation**

The respondent suggests that these terms have a narrow and specific meaning in planning terms and that, therefore, the phrase "development which is unsuitable in the context of present policies" should be substituted. It is considered, however, that in setting out the main thrust of the Plan's countryside proposals, as explanatory text, the alternative phrase would be confusing and certainly offers no advantage in terms of interpretation or application. As there is no Green Belt in the District it is not likely that the terms would be used in this context.

***Change Proposed – none.***

#### **Issue 2.13** **Paragraph 2.26**

##### **Representation:**

##### **Berkeley Strategic Land Ltd (210/6)**

Not all the settlements listed in H.2 and H.3 are sustainable within the terms of PPG3 paragraph 31.

***Change sought*** - not specified.

##### **Sparsholt College(353/3)**

Support the principle of providing development primarily in built-up areas, but this should not necessarily be in existing defined settlements. Sparsholt College is a large 'community' that may be defined as a built-up area or settlement.

***Change sought*** - amend strategy to provide for other built-up areas to be added to the list of settlements.

#### **City Council's Response to Representation**

An assessment was carried out to determine which settlements should be subject to Proposals H.2 and H.3, taking account of sustainability issues, urban capacity and other relevant factors. These issues are considered more fully in responding to objections to proposals H.2 and H.3 in the Housing Chapter.

Sparsholt College may have some of the characteristics of a settlement but is a 'community' with a specific purpose. It is not a community or settlement in the sense of comprising a predominantly residential area along with the range of land uses and facilities and services that a 'normal' settlement would. It is not, therefore, considered that the Plan should define it as a settlement in its own right so as to allow for further development.

***Change Proposed – none.***

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