

Winchester District Local Plan Review

Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

Issue 6.1 **Housing General H.1 – H.10**

Representation:

Sparsholt College (353/16)
Generally support the Housing Chapter.
Change sought – none.

P Pardoe-Williams (274/1 – Not Duly Made)
Object to new housing development specified in the Local Plan. The south east of England is too densely populated.
Change sought – don't provide more dwellings in the area.

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

Hampshire and each of the Districts within it generate their own housing needs, which it is legitimate to meet. The Structure Plan's housing requirements are predominately aimed at meeting the County's indigenous needs. In any event, the housing requirements for the District are now established through the Structure Plan, which the Local Plan must be in general conformity with.

Change Proposed – none.

Issue 6.2 **H.1/Paragraphs 6.1 - 6.7** **Strategic Requirements**

Representation:

Holmes & Sons (287/4) (287/8)
Support Proposal H.1 and paragraph 6.3 which include the commitment to "enable the construction of 7295 dwellings in the period from April 1996 to March 2011".
Change sought – none.

Holmes & Sons (287/6)
Object to omission of need to meet Structure Plan housing requirements as an integral part of the housing strategy.
Change sought - add to bullet point 1 of paragraph 6.7: "ensure adequate housing land is released to provide for at least 7295 new dwellings completed within the District during the period 1996 to 2011".

CALA Homes Ltd. (468/25)
Object to the assertion that the Local Plan Review has been prepared in accordance with the Structure Plan's Housing policies (paragraph 6.2). The Supplementary Planning Guidance on policy H4 requires reserve sites to be identified and the 'area of search' approach does not accord with this.
Change sought – not specified.

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

The components of the housing strategy set out in paragraph 6.7 are intended to achieve the housing requirements of the Structure Plan Review. The bullet points in paragraph 6.7 include reference to the West of Waterlooville MDA, encouraging urban capacity, carrying forward site-specific allocations and identifying 'areas of search' for reserve housing requirements. Proposal H.1 specifically commits the Plan to providing housing to meet Structure Plan requirements. There is, therefore, no need to add the suggested reference to paragraph 6.7.

The Supplementary Planning Guidance on Implementing Policy H4 is not part of the Structure Plan. The Local Plan is, therefore, correct to say that it accords with the Structure Plan's housing policies and the strategic planning authority has certified it as being in general conformity with the Structure Plan. It is recognised that the SPG seeks the allocation of specific sites for the reserve housing provision and this will be done at the Revised Deposit stage. The 'reserve site' approach should, therefore, be viewed as a stage in the process of identifying the reserve sites and this process is continuing (see Issue 6.6 below).

The opportunity should be taken to update the figures on housing completions, to establish the housing requirement at April 2001.

Completions 1996-2001. The Hampshire County Structure Plan Review's housing requirement 1996-2011 is 7,295 dwellings (Policy H2), of which 2,000 dwellings are to be at West of Waterlooville (Policy H3), with an additional 'reserve' requirement of 1,000 at West of Waterlooville and 2,000 at Winchester City (North) (Policy H4). Completions from April 1996 to March 2001 totalled 2,390 dwellings (source: Housing Land Supply in Hampshire Monitoring Information 2001, HCC). The remaining requirement for Winchester District is,

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation. *Change sought.*

City Council's Response to Representation *Change Proposed*

therefore, 2,905 dwellings + 2,000 dwellings at West of Waterlooville (+ the possibility of 3,000 dwellings on reserve sites). **Therefore, the 2001-2011 residual housing requirement = 2,905 dwellings** (excluding MDA and reserve sites), see proposed changes below.

Change Proposed - paragraph 6.3:

....Of this figure, some ~~2,460~~ 2,390 dwellings were completed in the period 1996-~~2000~~-2001, leaving about ~~5,435~~ 4,900 dwellings to be provided in the period April ~~2000~~-2001 to March 2011.

Change Proposed - paragraph 6.4:

....Meeting this particular requirement would then leave ~~3,435~~ 2,900 dwellings to be brought forward on other sites in the District during the Local Plan period.

Change Proposed - Proposal H.1:

Within the Local Plan area, provision will be made to meet the housing requirements of the Hampshire County Structure Plan Review by:

- (i) enabling the construction of 7,295 dwellings in the period from April 1996 to March 2011, of which ~~2,460~~ 2,390 had been completed by March ~~2000~~-2001 (leaving ~~5,435~~ about 4,900 dwellings to be completed from April ~~2000~~-2001 to March 2011). As part of this total, provision will be made for the comprehensive development of a new community to the west of Waterlooville, incorporating 2,000 new dwellings situated within a defined area, to be the subject of a Master Plan; and
- (ii) with regard to the additional requirement of the County Structure Plan for the release of a 'reserve' housing provision, the Local Planning Authority will identify "~~areas of search~~" sites for a reserve provision of 1,000 dwellings at West of Waterlooville and 2,000 dwellings at Winchester City (North).

Issue 6.3 Paragraph 6.7 Housing Strategy

Representation:

CALA Homes (South) Ltd. (220/2)

Object to the housing strategy in paragraph 6.7 as it fails to identify sites to meet the Structure Plan's baseline requirements.

CALA Homes Ltd. (468/27, 468/29)

Object to the housing strategy proposed, in particular, the failure to allocate a reserve MDA at Winchester City (North) in accordance with Structure Plan Policy H4.

Change sought – not specified.

City Council's Response to Representation

The housing strategy set out in paragraph 6.7 is intended to achieve the housing requirements of the Structure Plan Review. The bullet points include reference to the West of Waterlooville MDA, encouraging urban capacity, carrying forward site-specific allocations and identifying 'areas of search' for reserve housing requirements. Proposal H.1 specifically commits the Plan to providing housing to meet Structure Plan requirements, both for 'baseline' provision and for 'reserve' provision. It is proposed that Proposal H.1 be updated, as set out at Issue 6.2.

It is important that the Local Plan provides clear guidance about where development is and is not accepted in principle. The definition of settlement boundaries, by way of policy boundaries and development frontages, is a very clear way of doing this and is tried and tested in this area. It is also an approach that is widely adopted in other local plans.

Development and change over the last decade or so is not likely to have resulted in settlement boundaries needing to be extended, as

Winchester District Local Plan Review

Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

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

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

Estates Practice, Hampshire County Council (1434/26)

The existing "policy boundaries" and "settlement frontages" should be re-examined in the light of the last decade of growth and land use change/policy. Greenfield sites often offer more sustainable development and review and rationalisation of the County Council's assets may release greenfield sites that are suitable for development.

Change sought – *take account of sustainable opportunities for greenfield development.*

Estates Practice, , Hampshire County Council (1434/25)

In seeking to implement more sustainable patterns of development it will be necessary for the local planning authority to undertake a sustainability appraisal of development sites. Land outside the existing built-up areas may be more sustainable locations for new development.

Change sought – *delete "within the District's built-up areas" and amend paragraph to read; "The implementation of more sustainable patterns of development, making the best use of land and buildings and placing greater emphasis on accessibility to local services and facilities, education and employment and the public transport network."*

Holmes & Sons (287/5)

Object to objective 4 (paragraph 6.7) that seeks to resist development beyond defined boundaries of built-up areas.

Change sought – *add "except where housing land is allocated within this local plan, resisting development..."*

Clients of Southern Planning Practice Ltd. (475/8)

The strategy of the Plan should be broadened to focus on provision of affordable housing in settlements which give rise to the need by allocation of additional housing land for all tenures, with target numbers allocated to settlements.

Change sought – *not specified.*

most development has been within these boundaries. Setting aside issues surrounding brownfield v greenfield development and whether the boundaries are in the right place, it remains necessary for the Local Plan to distinguish between built-up areas and the countryside, and policy boundaries/development frontages are a very effective tool for achieving this, which should be carried forward into the Local Plan Review.

The settlements within the Local Plan that are subject to policy boundaries/development frontages (H.2 and H.3) have been reassessed as part of the process of reviewing the Plan. Sustainability issues have been foremost in undertaking this review and those settlements that performed worst on sustainability criteria and which had limited urban capacity were excluded from the provisions of H.2 and H.3. This resulted in 17 fewer settlements being included within the provisions of H.2/H.3 in the Deposit Review Plan than in the adopted Local Plan (mostly by excluding some 18 H.3 settlements). Whilst certain greenfield sites may be more sustainable than certain brownfield sites (as recognised by PPG3), this does not negate the need for the Local Plan to set out a clear general framework within which development proposals can be considered.

The sequential approach now strongly promoted in Government advice, notably PPG3, reinforces the need to identify those locations where development will in principle be permitted and, conversely, where it needs to be resisted. Respondent 287's suggested wording change is unnecessary, as any sites allocated for housing development would be included within settlement boundaries (other than the 'reserve' housing provision at the MDAs).

The Local Plan's strategy already focuses on the provision of affordable housing and seeks to maximise such provision in appropriate locations. However, settlements should not be extended merely in the hope of securing a proportion of the new development as affordable housing. Where there is a demonstrable need for affordable housing in a particular settlement, the Plan provides an 'exceptions policy' that would allow such development to meet the particular need outside settlement boundaries, if suitable sites are not available within the settlement. Whilst it may be preferable for the Local Plan to be able to identify or allocate such sites in advance, this is not something that is acceptable within the terms of Government advice. Indeed, PPG3 suggests that 'the needs of local people for affordable housing may often be best met by the exception policy'.

It is not, therefore, accepted that affordable housing needs should be used as a basis for extending settlement boundaries. Neither would it be realistic to set targets for the number of dwellings that should be provided in individual settlements. These would be likely to be arbitrary and it would not be realistic to put policies in place that would necessarily deliver the 'correct' number of units, or prevent this number being exceeded if otherwise suitable development opportunities arose.

Change Proposed – *none.*

Winchester District Local Plan Review

Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

Issue 6.4 **H.1/Paragraphs 6.8 - 6.24** **Housing Supply - Urban** **Capacity**

Representation:

CPRE Winchester and Havant District Group (1387/2)

Commend the City Council on its urban capacity study but concerned that the assessment of 3,226 (should read 2,226) dwellings may underestimate the potential total urban capacity of this district.

Change sought – *the total capacity should be boosted by the inclusion of 50% of the medium opportunities (755 dwellings) and 10% of the poor opportunities (61) to give an increase of 816 dwellings. The potential for building over surface car parks should be examined further and an allowance included.*

J Hayter (138/1), Bishops Waltham Society (212/13)

The "good opportunities" (WDLPR) are significantly under stated. Proposals to build on areas of children's play and general open space will aggravate shortfalls of such space. There is no allowance or new open space provision to meet the needs of the 2000+ brownfield dwellings through RT.3. Some small areas of open space are shown in the capacity study but many others are not, the definitions are not sufficiently definitive. The S.19 'reserve site' is not part of the base provision and therefore should be deleted from table 2. The Urban Capacity Study estimate of 2117 in Table 1 includes those that will have planning permission at the end of the period but are not completed. The Urban Capacity Study includes 44 sites totalling 920 dwellings that should be included within Table 2 as they are capable of accommodating 10 or more dwellings. The Urban Capacity settlement sub-total should be 1034 not 1036.

Changes sought – *A) amend Table 1 to include further "good opportunities" of housing supply e.g. parking and*

City Council's Response to Representation

The issue of whether the Local Plan makes adequate provision to meet strategic housing requirements has attracted a considerable number and range of representations, mostly from development interests, and largely on the subject of the Urban Capacity Study. The representations frequently raise several aspects of housing supply, but the responses to Issues 6.4-6.9 consider the various issues related to the Urban Capacity Study and other sources of housing supply. Issues related to the contribution of the MDA(s), allocations, and commitments are considered at Issues 6.5 – 6.8. In many cases respondents question several aspects of land supply and the representations listed under each Issue are, therefore, sometimes dealt with under other Issues.

Representations relating generally to the strategic housing requirements and the Local Plan's housing strategy are dealt with at Issues 6.2 - 6.3 above. At Issue 6.2 it is proposed that the relevant paragraphs and Proposal H.1 be updated to take account of housing completions to April 2001.

Urban Capacity

A large number of aspects of the Urban Capacity Study have been raised, including suggestions by some amenity groups that it under-estimates capacity, but mainly by development interests suggesting it over-estimates capacity. This is not, of course, a new issue as Local Plans have traditionally made allowances for the emergence of unallocated sites. Similarly, development interests have traditionally argued that these sites will not emerge in the quantity suggested and therefore additional housing allocations should be made. It is, therefore, worth briefly reviewing past housing provision and how the previous Structure Plan's requirements have been met.

The original Hampshire County Structure Plan (1991-2001) required the provision of 4,500 dwellings in Winchester District. Actual completions for the period totalled 4,662, a slight over-provision. At the Public Inquiry into the District Local Plan in the mid-1990s development interests argued that the Plan relied too heavily on 'windfall' sites and that more housing land should be allocated. In the event, the Inspector was more concerned that some of the large allocated sites and 'commitments' would not come forward as quickly as expected and recommended allocating a limited amount of additional sites for housing.

The adopted Local Plan estimated that 4,622 dwellings would be completed, very close to the actual figure of 4,662. In fact, 'windfall' sites performed better than expected as, not only was the requirement of 4,500 exceeded, but some of the allocated sites were not developed, including two recommended by the Inspector. Given the variable performance of the housing market during the 1990's, unallocated sites actually performed more reliably than others and it is evident that the Council was not at all over-optimistic in its estimates of their contribution. The work that has been done on the Urban Capacity Study is far more comprehensive than what was done for the adopted Local Plan.

Winchester District Local Plan Review

Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation. Change sought.

City Council's Response to Representation Change Proposed

residential development of station car parks; building over railway lines; conversion of the majority of private and some other garages in the District to dwellings; sites not meeting the "good opportunity" criteria that will come forward; "windfall", change of use and site assembly.

B) Provide better justification that all the "good opportunities" urban capacity will be developed within the Plan Period by determining the new going rate from past trends and new identified capacity; evaluate the PPG3 warning against "unreal expectations of the developability of particular sites" by showing how the 88pa in the last year before the new PPG3 will be accelerated to 300+ pa by 2004; identify supply from land where WCC has land ownership; show why some has been equally available under the currently adopted planning policies but has not come forward; show that the effect on brownfield supply of the advice of DCA against any increase in the requirement for subsidised affordable dwellings above 30%; identify any community support for the loss of open space and parking; how proper consideration has been given to the land for services, facilities and the effect of RT.3.

C) Delete some open space sites from the Urban Capacity Study and adjust Table 1.

D) Amend WDLPR 6.14 so that open space protected by RT.1, RT.2 or RT.3 as proposed to be amended are sites "not suitable for development". Amend 6.17, Urban Capacity Study and Table 1 to reflect this.

E) Delete from Table 2 the S.19 site at Whiteley but still refer to it in the supporting text. Amend Table 1 accordingly.

F) Phase the supply from land within the control of the City Council.

G) Subtract from the 2117 those permissions that will not be completed at the end of the Plan period.

H) Add to Table 2 all sites in the Capacity Study of 10 or more or adjust Table 1 accordingly.

Amend Table 1 to take account of the above, showing a minimum need for 3006 dwellings on brownfield sites.

Settlements Contributing to Urban Capacity

Some respondents argue that too many settlements are intended to contribute to urban capacity and that the smaller and more isolated ones are not sustainable locations for development or are unsuitable for development at 30-50 dwellings per hectare. One respondent suggests excluding all H.3 settlements. This point has been addressed at Issue 6.3 above and is also considered at Issues 6.53 and 6.62, in relation to the application of Proposals H.2 and H.3.

The settlements that are subject to policy boundaries/ development frontages (H.2 and H.3) have been reassessed taking account of sustainability criteria. 17 settlements are no longer included within the provisions of H.2/H.3, as compared to the adopted Local Plan, but those that are included are considered appropriate locations in principle for development. It is entirely appropriate that the estimates of urban capacity include likely provision from all of the settlements in which the Local Plan provides for housing development to take place (H.2 and H.3 settlements).

Government advice is clear about the need to avoid development of less than 30 dwellings per hectare and the Local Plan applies this requirement. It is not accepted that certain villages are incapable of accommodating development of this density, although the need to maintain the character of an area will, of course, need to be taken into account.

Constraints on Development

A large number of respondents suggest that the urban capacity sites are subject to a variety of constraints that will prevent them coming forward. These points are made mostly in general terms and objections to the inclusion/exclusion of particular urban capacity sites are considered at Issue 6.9 below. The various constraints specifically raised are addressed below:

Land ownership/assembly – land ownership/assembly was one of the key factors in classifying whether sites were 'good', 'medium' or 'poor' opportunities. Sites that did not appear from the survey to be in a single ownership, or easily brought into a single ownership, were not classed as 'good' opportunities and those with significant assembly problems were classed as 'poor'.

The Urban Capacity Study and the Local Plan's estimates of capacity only include 'good' opportunities, which by definition do not have assembly constraints. Examination of the Urban Capacity Study maps shows, for example, that large back gardens tend only to be shown as development opportunities if they can be developed independently. Rows of back gardens, whilst their development may be quite acceptable and possibly preferable, are not included because the number of ownerships involved would prevent them being classified as 'good' opportunities.

Market issues/unwillingness of owners to sell – the Urban Capacity Study and the 'Chesterton Report' on which it draws, include an assessment of market issues. It was a requirement of the brief for the Chesterton Report that market advice was included and development interests (private and housing association) were involved in

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

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

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

Bishops Waltham Parish Council (211/3)

Support avoiding the need for greenfield development but it has not been demonstrated that enough identified capacity will come forward within the Plan Period. The City Council have not adopted the non-planning policies and implementation plans to ensure that obstacles to the supply of private sites are minimised and the many sites within its own control are brought forward at the required time. The shortfall of affordable housing is not fully recognised.

Change sought – A) amend table 1 to include further “good opportunities” of housing supply e.g. parking and residential development for station car parks; building over railway lines; conversion of the majority of private and some other garages in the district to dwellings.

B) Provide better justification to show the good opportunities in the Urban Capacity Study will come forward.

C) Include details of urban capacity sites in WCC ownership and the measures proposed to bring them forward.

House Builders Federation (266/3)

The Plan's approach to the MDAs is not consistent, with only an 'area of search' for the Winchester reserve MDA. The H4 SPG says that local plans should identify all the reserve provision. The Plan should identify a detailed boundary of the reserve MDA in the second deposit version of the Plan. The Urban Capacity Study overestimates the likely extent of housing which can realistically be expected to come forward during the Plan period due to a lack of market or financially viability testing. Local opposition may hinder any policy change, e.g. regarding the loss of amenity space, private parking and higher densities. The Plan is very optimistic about the contribution of the Waterloo MDA in assuming it will be developed by the end of the Plan period. It is doubtful that 2000 dwellings will be completed by 2011. There is a discrepancy between the City Council's and County Councils large site commitment figure (WCC – 1,227, HCC - 1,132) and between the estimates for

workshops during the preparation of the Chesterton Report. Chesterton identified four broad market areas: villages/low density suburbs; private suburban estates; council estates; and town centre/terrace areas. The housing market is now significantly stronger than when the Report was prepared in early/mid 2000. Even so, it was noted that private developers would find all market areas attractive except council estates, where they may be reticent but where housing associations would favour development opportunities.

The general strength of the housing market locally is now such that there are few uses that command higher land values than housing. Therefore, in economic terms, housing is as likely as most uses to be proposed on sites coming forward for development, subject to planning policies and other factors being favourable.

Some respondents suggest that individual landowners should have been consulted, individually or on a sample basis and that sites should have been individually assessed. This was an issue that was considered carefully during the preparation of the Study. The Study includes over 500 'good' opportunity sites and there are many more 'medium' and 'poor' sites. It would have been logistically impossible with the resources available to approach all owners, or even a meaningful sample, even if ownership was known. In many cases ownership is not obvious and even where sites include an existing house it may not be owner-occupied. It was, therefore, decided not to approach individual owners.

The best test of market viability and owners' willingness to sell will be to monitor how sites are brought forward in practice. Experience to date suggests that, far from developers finding difficulty in bringing forward the unconstrained 'good' opportunities, they are succeeding in assembling much more complicated sites, which are being brought forward in considerable numbers. The Local Plan refers to the possible need for the Council to get involved to assist land assembly and stimulate site delivery. This matter is discussed below in response to specific objections, but on the basis of current evidence, significant intervention is most unlikely to be needed.

Contamination – the likelihood of contamination was one of the 'physical characteristics' of sites assessed when considering whether they were good/medium/ poor opportunities. Contaminated sites are not a significant problem in this District and the Local Plan's policies seek to avoid residential development of current business sites, which are the sites more likely to suffer contamination. Where housing is acceptable it is one of the uses most likely to be able to afford the clean-up costs involved. If any 'good' opportunities are found to involve significant contamination they should be excluded, but at present none are thought to be affected.

Conservation Areas/Listed Buildings – there is no reason in principle why there should not be additional development in conservation areas or close to Listed Buildings. Conservation area designation seeks to enable additional control over the design of development, not to restrict further development in principle. Few of the District's conservation areas are designated to retain areas of low-density development, most being centred on old town and village centres

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

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

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

Knowle. The Plan puts forward an extreme version of the 'brownfield before greenfield' principle and fails to provide choice in the size, type and location of dwellings. The settlements with settlement boundaries fail to acknowledge sustainability criteria and many are remote and isolated with minimal facilities. Developments of 30+ dwellings per hectare are unlikely to be in keeping in these settlements. The balance at the moment is too heavily biased in favour of "brownfield development at all costs" and it would be more sustainable to allocate greenfield sites on the edge of the one or two largest settlements. The housing strategy is called into question and greenfield allocations should be made.
Change sought – allocate greenfield sites to meet Structure Plan requirements, provide choice in the housing market and have regard to sustainability aspects.

J Bloor Ltd & St Michaels Development Co. Ltd. (216/1)

Table 1 is an over-optimistic assessment of the realistic yield during the Plan period. The urban capacity study takes insufficient account of constraints and not all allocations and commitments will come forward in the Plan period. Present housing proposals in the Plan are insufficient to deliver strategic housing requirement.

Change sought – adjust Table 1 and introduce additional allocations in Table 2, specifically land at Otterbourne.

CALA Homes (South) Ltd. (220/3, 468/30, 468/31)

Object to Proposal H.1, paragraph 6.11 and Table 1 as the Plan fails to make proper provision to meet the Structure Plan's baseline requirements. If the Local Plan intends to rely on Urban Capacity sites, it should allocate the sites for residential development.

Change sought – allocate sufficient land to meet strategic requirements.

CALA Homes (South) Ltd. (220/4, 220/5)

Object to the supposition that sites identified in the Urban Capacity Study

which are already developed at quite high densities. Further development, even at medium/high densities, would not therefore, necessarily be out of character in these areas. Conservation areas, especially Winchester and the larger villages, have traditionally been a strong source of development opportunities and the Urban Capacity Study suggests there is further capacity for this trend to continue.

Listed Buildings can also be an important source of urban capacity, particularly through change of use/conversion. The need to respect the setting of Listed Buildings is acknowledged and development opportunities will need to be tackled sensitively where they are within the curtilage of listed buildings. However, these instances are limited in number and, if it is shown that sites are unduly constrained by Listed Buildings, they should not be classified as 'good' opportunities.

Area of Outstanding Natural Beauty – the AONB designation (and the possible South Downs National Park) will not restrict the principle of development, other than for major development, which should be directed elsewhere. None of the urban capacity sites identified in the existing AONB or proposed National park are of this scale. It is not, therefore, considered that the location of a site within the AONB/NP is a constraint in practice.

Certain types of sites not suitable for housing – some respondents suggest that certain types of sites are not suitable for housing development and their contribution should be excluded from the Urban Capacity Study. The types of sites raised are: open spaces; garages; car parks; 'living over the shop'. Each of these are considered below.

- **Open Spaces.** There has been a significant level of objection to certain open spaces being included in the Urban Capacity Study, most notably a site at Morley Drive/Langton Road, Bishops Waltham and Dyson Drive/Francis Gardens, Winchester. These site-specific matters are dealt with at Issue 6.9 below. It is, however, accepted that open spaces which are important for recreational or amenity reasons should be protected from development. The Local Plan's Proposals RT.1 and RT.2 are applied to protect such open spaces within the built-up areas and they are not therefore identified as urban capacity sites. Where site-specific objections have been raised the sites concerned have been reassessed. However, other open areas may have scope for acceptable development and such sites should, therefore, be retained within the Urban Capacity Study.
- **Garage courts** were identified by the Chesterton Report as a significant potential source of urban capacity. Site surveys have shown that some are in multiple private ownerships and these were not included within the definition of 'good' sites (due to the number of ownerships involved). Representations on the Urban Capacity Study have suggested that a small number of sites that have been included are also in multiple private ownership and, where this is the case, they should be removed as they are not 'good' opportunities. However, where sites are in single ownership and otherwise meet the criteria for definition as 'good' opportunities, it is appropriate that they should continue to be

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation. *Change sought.*

City Council's Response to Representation *Change Proposed*

"...will come forward under the terms of the Plan's general proposals." There is an over reliance on windfall sites coming forward. Table 2 should identify the urban capacity sites expected to come forward.
Change sought – *identify the Urban Capacity Study sites which the Council expect to come forward.*

Estates Practice Hampshire County Council (1434/27)

Object to the fact that under "the sequential approach" and "urban capacity" the Urban Capacity Study is introduced as a supporting document to the Local Plan Review process.
Change sought – *not specified.*

Holmes & Sons (287/3)

Object to the assumption that all 'good opportunities' will come forward during the Plan period.
Change sought – *amend to acknowledge that not all 'good opportunities' sites will come forward and will result in a reduced supply of affordable housing. Amend Table 1 accordingly.*

Holmes & Sons (287/15)

The high level of "good" urban capacity sites which do not benefit from planning permission, together with recent windfall rates of implementation casts serious doubts over the conclusions of the Urban Capacity Study.

Change sought – *re-examine forecasts including sampling landowners of urban capacity sites. Amend Table 1 to reflect recent 'windfall' rates and incorporate realistic 'lapse rate' allowances (15% suggested, which would require 770 additional allocations/provision).*

Bishop's Waltham Society (212/12)

It is not well demonstrated that sufficient identified capacity will come forward within the Plan Period with sufficient flexibility to meet the "manage" requirement of 'plan, monitor, manage'. The Plan has not adopted the non-planning policies and implementation plans to ensure obstacles to the supply of private sites are brought forward. Proposals to build on open space and children's play areas will result

identified.

- **Car Parks.** The Urban Capacity Study actually contains few if any 'car parks' as such, although it does include some parking areas. The Local Plan also refers to the potential scope for redeveloping some town centre car parks in Winchester, but these are not included in the Study. Any development of car parks for housing that may happen during the Plan period would, therefore, be additional to the estimates of urban capacity and should not be subtracted from them.
- **'Living Over the Shop'.** The Local Plan contains a separate estimate of the contribution of dwellings through 'Living over the Shop' (LOTS) in Winchester. This source of supply was assessed separately in the Urban Capacity Study, using several alternative methodologies. One respondent suggests that there is double counting of urban capacity and LOTS sites. This is not the case and it can be seen from the Urban Capacity Study that no urban capacity sites are identified in the primary shopping area of Winchester. Another respondent suggests that housing is incompatible with shops. While there remains some institutional resistance to mixed use of retail buildings, this is changing. Government initiatives and changes to the General Permitted Development Order also aim to promote better use of existing buildings. In Winchester there has been some success in bringing underused upper floors into housing use, especially by housing associations.

It is, therefore, concluded that the Plan is right to include an estimate for the contribution of LOTS. The Deposit Plan's estimate of 109 dwellings was for an 11-year period (2000-2011). This should now be recalculated to give a 10 year estimate ($109/11 = 9.9 \times 10 = 99$). An estimate of **99 dwellings should, therefore, be included for LOTS.**

Resistance to policy changes – one respondent points out that the Local Plan has several statutory processes to complete, which may result in its policies being changed due to public resistance to them. However, the Local Plan's policies reflect Government and strategic planning policies and the Local Plan Inspector will be required to have regard to these and to ensure that the Plan is in accordance with the Structure Plan Review. Any changes that may be made are, therefore, not likely to alter the underlying thrust of the Local Plan towards making more full use of urban capacity and promoting more efficient use of land, as required by Government policy. The Local Plan Inspector will also need to consider how an adequate supply of land is to be maintained whilst operating these policies and is not likely to recommend changes that would frustrate this.

It is concluded that the various constraints to development that have been suggested apply to the 'good' urban capacity sites have generally either already been taken into account in classifying the sites, or do not amount to significant constraints. It is accepted that certain individual sites need to be reassessed as a result and this has been done in producing the Housing Monitoring Report (using a March 2002 basedate). The updated estimate of urban capacity as of

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation. **Change sought.**

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

in over-development.
Change sought - not specified.

March 2001, which it is proposed be included in Table 2 of the Plan (see Issue 6.5 below), reflects the results of this reassessment.

R Stubbs (302/2)

Plan does not make sufficient provision for new housing and is over reliant upon the yield from unidentified sources. Yield expectation from 'reserve' MDA is over optimistic.

Changes sought – *allocate additional land for housing development or reserve sites that are free from development constraints.*

Site Delivery

Several respondents suggest that the estimates of urban capacity are not likely to be achieved. One suggests the figure should, therefore, be discounted by 15%. Others suggest that sites will not come forward as they do not yet have planning permission or because affordable housing requirements will affect viability.

The various constraints to development have been addressed above and it is concluded that these will not generally effect the bringing forward of sites for development, other than in a few specific cases which should be removed from the 'good' opportunity category. The suggestion of applying a 15% or other 'lapse rate' would only be appropriate if there was some evidence that sites would not come forward. There is no such evidence and the rate suggested is totally arbitrary. The fact that sites do not yet have planning permission does not mean that they cannot gain it during the Plan period. The purpose of the Local Plan is to put in place policies that will allow these sites to come forward and there is no impediment to sites gaining planning permission, whether they be 'good' opportunities or other sites that are acceptable within the terms of the Plan's policies.

Kris Mitra Associates Ltd. (289/7)

The Urban Capacity Study cannot be relied upon to provide the number of units expressed. Even if they have been assessed as "good opportunity" sites, they may have constraints and not come forward for development. **Change sought** – *carry out a more detailed assessment of the sites in the Urban Capacity Study.*

The lack of affordable housing is one of the City Council's main concerns and the Local Plan therefore seeks to put in place additional requirements of new development, including lower thresholds and requiring a higher proportion of development to be affordable. The potential for conflict between this aim and the objective of increasing urban capacity was recognised at an early stage. Advice was taken from the Council's Estates Department about the effect of increased affordable housing requirements on viability and the bringing forward of development opportunities. The conclusion was that a large increase in the proportion of affordable housing sought could lead to fewer sites being brought forward and problems where developers had already acquired land. It was therefore decided that any increase should be promoted through the Local Plan process, and in the larger settlements the increase was only from 30% to 35%. The possible dangers of a higher increase in Winchester than neighbouring Districts was noted, although so too was the attractiveness of the District to developers. In fact an updated housing needs survey has been commissioned jointly by Winchester, Eastleigh, Test Valley and East Hampshire Districts, which gives an opportunity to co-ordinate affordable housing requirements with several adjoining authorities. It is, therefore, not concluded that the requirements for affordable housing sought would make development non-viable or result in sites not coming forward.

Heritage Property Holdings (323/1)

Over reliance is placed on development within built up areas and on the Urban Capacity Study. This could be at odds with the Winchester Conservation Study. The Local Plan should acknowledge that planned extensions to existing urban areas are the next most sustainable option. **Change sought** – *amend paragraph 6.8 to read: "the local plan strategy for housing provision is based on achieving the non-MDA housing requirements from within or adjoining the District's defined built up areas. Add new 5th bullet point: - "planned extensions to existing urban areas where this is the most sustainable option".*

North Whiteley Consortium (322/3)

The estimated number of dwellings that are proposed to come forward through the urban capacity study is unrealistic and unachievable.

Change sought – *reduce the urban capacity estimate to sites that are shown to be able to come forward within the plan period. Include a new paragraph indicating how the proper planning of residential development can occur within the District.*

Whilst legitimate planning requirements, such as for affordable housing, may sometimes affect the economic viability of development, this is only likely to be in marginal cases. Such sites are unlikely to have been identified as 'good' sites initially and will not, therefore, feature in the Urban Capacity Study. The affordable housing requirements are District-wide and, given the extremely strong housing market in the District, it is inconceivable that housing development will be prevented across the District by affordable

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation. **Change sought.**

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

Hallam Land Management (354/1)

Object to the statement that housing supply is sufficient to meet Structure Plan requirements (paragraph 6.11). The Urban Capacity Study is over optimistic and not deliverable within the Plan period.

Change sought – delete final sentence of paragraph 6.11. Amend the capacity to include only sites where an adverse policy constraint has been lifted by virtue of this revised Plan.

Bewley Homes (386/14)

The Urban Capacity Study is flawed and should not be relied upon. **Change sought** – reassess the sites listed in the Urban Capacity Study. Further sources of capacity need to be highlighted to ensure that there is adequate housing during the Plan period.

G Payne (863/1)

The Plan contains an over optimistic view of the housing provision that will be delivered across the Plan period. The potential provision from sites within built-up areas is grossly exaggerated. Greenfield sites will need to be allocated for residential development.

Change sought – land at Pitt Manor should be allocated for a mixed-use development incorporating housing, employment and public open space.

Bryant Homes Ltd. (397/6, 397/10, 397/24)

Many of the sites that are considered 'good opportunities' are flawed due to land ownership/assembly issues, likelihood that many private landowners will not sell, and the issue of viability. Sites may be adjacent to industrial land, contaminated, comprise open space or garages, be in conservation areas, or require land assembly. The estimate for living over the shop is too optimistic as residential may not be compatible with shops. The large proportion of small sites will not produce the required affordable housing. The strategy of relying on brownfield sites is therefore flawed and will fail to meet strategic requirements.

Change sought – identify additional greenfield sites to meet the shortfall.

housing or other requirements. Similar requirements are also being put in place in other Districts in Hampshire, so developers will face similar requirements, wherever they wish to develop. The requirements will effect land prices, but these are so high at present, and likely to remain so, that affordable housing requirements are unlikely to have a significant effect on the delivery of urban capacity sites. The Corporate Housing Enablement Group has been set up to consider affordable housing provision in conjunction with new development and to recommend how this matter should be dealt with when planning applications are determined. Issues of viability can be considered by this group and, in exceptional cases, may lead to a recommendation that requirements are met by off-site contributions or even that requirements are relaxed.

Inadequate Affordable Housing/Infrastructure Provision

Some respondents argue that relying on urban capacity sites will result in under-provision of affordable housing or of infrastructure. There is an element of conflict between the Government's aim of achieving affordable housing provision in conjunction with new development and promoting urban capacity, which is often on sites smaller than the Government's thresholds for affordable housing. The Local Plan seeks to apply lower thresholds in order to address this issue and it is hoped that the prescriptive thresholds set by Government will be changed or abandoned during the Plan period. The Council is also initiating positive measures to promote urban capacity sites, especially for affordable housing and these are discussed below. Housing associations have particular skills and experience in developing certain types of sites identified by the Urban Capacity Study and may, therefore, be able to achieve significant levels of development for affordable housing purposes.

The Local Plan seeks to put in place policies to secure adequate infrastructure provision of various types. It is also important that service/infrastructure providers are clear about their requirements and work with planning authorities to achieve them. Where this happens, as in the case of open space provision, procedures and systems have been established to secure appropriate provision. Other service providers, such as the private utilities, are able to secure the provision of infrastructure or contributions directly from developers. In the case of education, the County Council is proposing to set up a system whereby all housing developments contribute to the education needs they are likely to generate through a system similar in principle to the Open Space Funding System. It is understood that the County Surveyor is investigating a similar arrangement for transport and other infrastructure. The Plan contains general policies that provide the basis for such schemes and, where they are developed in time, specific proposals can be included in the Local Plan.

Housing Choice

It is suggested that urban capacity sites will not provide the level of choice that new house buyers should have. However, the planning system and planning policies inevitably constrain housing choice to some extent. Even so, housebuilders are able to promote schemes that they believe meet market needs within the constraints of planning policies. There is a very large range of sites available in many different settlements and types of locations. The Plan, therefore, does

Winchester District Local Plan Review

Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

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

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

Bryant Homes Ltd. (397/9), Hawthorne Kamm Ltd. (374/1).

Paragraph 6.8 states that residential densities should be at least 30-50 dwellings per hectare, which is too prescriptive.

Change sought – *the Plan should encourage rather than require higher densities.*

C Bazlinton (1126/1)

Object to the increase in density of housing as it does not provide 'greater housing choice'. 'Family friendly' houses with a reasonable garden will become scarcer and housing choice will be reduced.

Change sought - *paragraph 6.7, replace 'greater housing choice' with 'maintain as much housing choice as possible' and 'a minimum of environment change'.*

Bewley Homes (386/13, 386/16), Bryant Homes Ltd. (397/11)

Development on public open space is contrary to PPG3. The redesign of existing commitments is considered to be unrealistic. The development/ redevelopment of car parks is not considered to be viable. The estimated provision from living over the shops is considered to be too optimistic.

Changes sought – *delete references to development on public open space.*

Reference to developing on town centre car parks should be deleted. The strategy should be revised to allow a number of greenfield sites to provide sufficient affordable housing.

Bewley Homes (386/16, 386/17, 386/18), Bryant Homes Ltd. (397/12, 397/13)

The Plan does not state how the City Council would assist in the assembly of land, nor how this would achieve a higher proportion of urban development. It is also not stated what action will be used to stimulate the market, or how this would be achieved. The issue is not addressed in the implementation section (Chapter 14).

Change sought – *explain how the City Council aims to be involved in or assist in the assembly of land and stimulating the*

provide huge choice in the type and location of sites, much more so than a limited number of greenfield allocations could achieve. There is also still scope within the Plan's policies for a range of house types and sizes, indeed this is what the Plan encourages. Whilst development must take account of Government policies on density, it is apparent that developers are still able to provide larger dwellings, where they include a mix of units overall so as to achieve a density of at least 30/hectare.

The new-build housing market is, of course, only a relatively small part of the total housing market. One of the reasons for the Local Plan promoting smaller units is due to the imbalance in the existing housing stock in favour of large units. The housing market in total, therefore, provides a wide choice and any emphasis on smaller dwellings in newly-built schemes will be beneficial in serving to achieve a better balance in the housing stock as a whole.

Identification of Sites

Several respondents suggest that urban capacity sites should be specifically allocated in the Local Plan or that they should be included in Table 2. It would be impractical to allocate all 500+ urban capacity sites in the Local Plan, but they are all identified in the Urban Capacity Study. This is considered the most practical way to identify the sites and inclusion in the Local Plan would be likely to lead to protracted discussion of individual sites, which would not be appropriate at this level. The purpose of the Urban Capacity Study is to examine the likely scale of contribution that urban capacity sites will make. While all the 'good' opportunities are considered capable of being delivered during the Plan period, it is recognised that in practice some will not come forward and other sites, not identified as good opportunities, will take their place. The inclusion of a site within the UCS does not, therefore, amount to an allocation. Given this, and the problems associated with notifying site owners, individual urban capacity sites should not be specifically allocated for development.

Table 2 of the Plan lists allocations and, as noted above, it is not considered that individual urban capacity sites should be allocated. Hampshire County Council produces comprehensive monitoring information on an annual basis that lists all large site commitments (10 or more dwellings) i.e. sites allocated in Local Plans or with planning permission. Once larger urban capacity sites gain planning permission they will be included in monitoring information as commitments. This is considered a more accurate and responsive way of dealing with such sites, rather than inclusion in the Local Plan, which would inevitably just result in a snapshot of the situation at a particular point in time. Monitoring of urban capacity is discussed in more detail below.

The City Council's Role in Site Delivery

A number of respondents seek clarification of how the City Council might assist in land assembly, bringing forward development on land it owns, and stimulating development of urban capacity sites, as referred to in paragraphs 6.18-6.20. Given the strong housing market existing, it may not be necessary for the City Council to get involved in site assembly. However, it does have compulsory purchase powers that can be used to further its planning policies. These are only likely

Winchester District Local Plan Review

Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

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

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

market (paragraphs 6.18 & 6.20).

Bewley Homes Ltd. (430/1)

Many of the sites identified in the Urban Capacity Study are flawed as they rely on the agreement of landowners and may not come forward.

Change sought – *amend the housing allocations under policy H1 to include land off South Drive, Littleton.*

William Wheatley (Wickham) Ltd. (472/2)

Object to the implication that the requirement for 7295 dwellings can be met through the approach proposed. Table 1 includes an optimistic assessment of urban capacity and will result in under provision of housing over the Plan Period.

Change sought – *amend Table 1 to reflect a more realistic level of housing supply. Allocate land at William Wheatley, Wickham for housing.*

Berkeley Strategic Land Ltd. (210/11)

The strategy of resisting development beyond the defined boundaries of built up areas is flawed. The capacity of the existing built-up areas is insufficient to meet housing requirements, it is not clear how 'additional sources of urban capacity' are to be promoted (this would seem to need a relaxation of requirements), there needs to be effective monitoring. The strategy will not lead to more sustainable patterns of development.

Change sought – *amend housing strategy to show that a search sequence has been undertaken in order to identify opportunities for urban extensions. Explain in the text how additional sources of urban capacity will be encouraged. Set out how monitoring will take place and include a specific policy on monitoring.*

Berkeley Strategic Land Ltd. (210/17)

More information about neighbourhood plans should be provided (paragraph 6.19), including when one would be required, who would produce it, what would its status be, would it be subject to public consultation?

Change sought – *add more detail to explanatory text.*

to be used to assemble land for private developers in exceptional circumstances, but this may be possible provided the Council's costs and any liability were covered.

The Council is already taking action to help bring forward urban capacity sites and facilitate development of its own land. An additional housing enablement officer has been appointed specifically to assist housing associations in bringing forward urban capacity sites. The housing associations clearly believe this will lead to significant development opportunities, as they are helping to fund the post. One of the first initiatives is to appoint consultants to carry out a neighbourhood planning exercise at Stanmore and Highcliffe, in Winchester. Whilst expected to identify substantial capacity for housing development, especially affordable housing, this exercise also aims to identify and meet community needs for infrastructure, facilities, open space, etc. It is hoped that this project will be a successful pioneer of similar schemes in other parts of the District.

This is one type of neighbourhood plan, led by the City Council and including public involvement. Neighbourhood plans could also be developed by local communities, in a similar way to Village Design Statements. These are adopted as supplementary planning guidance, provided they accord with the development plan and Government advice. They would also need to be subject to public consultation prior to adoption.

Monitoring

One respondent seeks a better justification for why good opportunities are likely to come forward and suggests using past trends, something that PPG3 suggests may be useful. Another wishes to see more details provided of monitoring processes and suggests a policy on monitoring should be included.

At the time of publishing the Deposit Local Plan Review a base date of March 2000 was used for housing figures. This coincided with the date of publication of PPG3. Because PPG3 introduced such a fundamental change in the way urban capacity is dealt with, it is not considered that earlier trends or 'going rates' in the provision of urban capacity sites will be particularly informative. The respondent suggests there will need to be an substantial increase in the development of these sites to meet strategic requirements, but the rate of non-MDA housing development required over the period 2001-2011 (290 dwellings per annum) is quite modest compared to the last 5 years' completion rates (478 p.a.). Whilst completions over the last 5 years included several allocated sites and provision at Whiteley (similar to an MDA), there is still provision in the Local Plan Review for considerable development on previously allocated sites, at Whiteley, Denmead and Knowle.

Furthermore, it is expected that the policy shift initiated by PPG3, which the Local Plan seeks to implement, will lead to a substantial increase in the contribution of urban capacity sites. All the indications at present are that developers are being more vigorous in their efforts to bring forward urban capacity sites than they are with allocated greenfield sites.

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

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

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

Berkeley Strategic Land Ltd. (210/12, 210/13, 210/14, 210/15, 210/16, 210/18)

The objective of trying to accommodate all non-MDA housing within the urban areas, and the Urban Capacity Study, are flawed and the Council will have to look to urban extensions in order to ensure an adequate supply of housing. Many sites cannot be developed at the required densities and are not 'good' opportunities. Existing policies regarding conservation areas and listed buildings will constrain the development capacity. The Local Plan does not promote policies that will secure the level of capacity suggested and greater detail is needed on what action is to be taken to bring forward 'medium' and 'poor' sites.

Change sought – the Urban Capacity Study should be discarded, with an amended Urban Capacity Study produced drawing upon the methodology and findings commissioned by the objector. Amend the housing strategy to cater for smaller urban capacity figure. Add detail to paragraph 6.20 to show how the Council will encourage development opportunities, or delete references to them.

Weatherstone Properties (851/2), Mr & Mrs Markham (855/2), Breamore Investments Ltd. (858/2), James Duke & Sons (Holdings) Ltd. (866/1), M25 Group (845/2), P Hunt (849/1)

The Local Plan and Urban Capacity Study adopt an over optimistic view of housing provision. The estimate of development from 'optimal' locations is grossly overestimated and fails to take account of conservation constraints in Winchester. There are also issues of contamination. The Urban Capacity Study does not comply with national guidance and is flawed because sources of supply have not been individually assessed and discounted, the character areas are not reflective of other areas in the District, and it is not transparent making it difficult to assess whether the capacity estimate is reasonable. Greenfield sites must be allocated for residential development in order to ensure the strategic housing requirement is met.

The importance of monitoring is fully accepted and is acknowledged in the Urban Capacity Study. The Study has now been updated to an April 2001 basedate and the intention is to continue to update it on an annual basis through the Housing Monitoring Report. The results of the updates will be published annually in the Housing Monitoring Report, which will be published with the Revised Deposit Local Plan. Although April 2001 forms a useful base date for housing provision figures, the figures in the Housing Monitoring Report have been updated further, to an April 2002 base.

The update has not involved a re-survey of sites on the ground, although it is acknowledged this will need to be done, probably at 5-year intervals. It is, therefore, mainly a desk-top study, involving deleting Urban Capacity Study sites that were completed in the year April 1 2000 – March 31 2001, which totalled 79 dwellings. Other sites that are not now expected to contribute were also deleted (total 51 dwellings), arising from changes to the types of site that should be included, in particular the exclusion of certain open space areas and revised estimates of site capacity (see Issue 6.9). This category of deletions is likely to be a one-off, although the capacity of sites will need to be updated as planning permissions are granted. The sites added consist of planning permissions issued from April 2000 – March 2001 on sites not already included in the Study (net gain of 43 dwellings). The updated situation at April 2001 is, therefore, as follows:

UCS total at April 2000:	2117
Sites deleted (completed):	79
Sites deleted (other reasons):	51
Sites added (gained planning permission):	43
Revised UCS total at April 2001:	2030

It can be seen from the table above that a number of development opportunities have come forward and gained planning permission that were not anticipated by the UCS (43 dwellings), suggesting that the Study has taken a cautious view of the contribution of urban capacity sites. The year for which this monitoring has been undertaken immediately followed the publication of PPG3. Therefore, although completions on UCS sites within the period were quite low (79), it is to be expected that the rate at which sites are brought forward will increase further over subsequent years and experience suggests this is happening. What is clear from the table is that there remains very considerable capacity for the remaining Plan period (2030 dwellings), of which a significant proportion already benefit from planning permission.

Previous monitoring of development has shown that very few, if any, housing planning permissions in Winchester District lapse without being implemented. It is, therefore, possible to be confident that all or most planning permissions granted more than 5 years before the end of the Plan period (i.e. up to 2006) will result in completions within the Plan period. By that time it is expected that a large proportion of the sites in the Urban Capacity Study, as updated through monitoring, will have planning permission or be completed. It is proposed that a full re-survey be undertaken by 2006 so that the Study can be updated by adding/deleting sites following a new on-the-ground survey and to

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation. **Change sought.**

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

Changes sought – allocation of land for housing at the following locations: South of Oliver's Battery, Capers End, Curdrige (development frontage extension), the Bridge Hotel, Shawford (development frontage extension), Abbey Mill, Bishops Waltham (mixed use scheme), land at Southdowns, Old Alresford, land south of Locks Lane, Sparsholt.

Bovis Homes Ltd. (213/1, 213/3)

The Urban Capacity Study over estimates the housing that can realistically be expected to come forward and the Plan is over-optimistic about housing supply which may be affected by delays at West of Waterlooville or reserve sites.

Change sought – add a new policy allocating land at North Whiteley for residential or mixed use development and land adjacent to Knowle Hospital for housing, employment, open space and a primary school to create a sustainable community.

Westbury Homes (Holdings) Ltd. (469/2, 469/11)

Object to the implication that the housing requirement of 7295 can be met through the Plan's approach. Support the principle of an Urban Capacity Study but object to the methodology used. Object to the 'blanket' application of the 'optimum housing scenario' to all central Winchester sites. Object to the under-provision of housing land throughout the Plan period, particularly the over-optimistic assessment of supply through Urban Capacity. The estimate of 'living over the shop' seems to represent duplication with the 'good opportunities' in the Urban Capacity Study. Current build rates are unlikely to produce the required dwellings at both the MDAs.

Change sought – Change the wording of the Urban Capacity Study to reflect more closely Government guidance. The last part of paragraph 6.10 should be amended to read "...the estimated capacity of sites is optimised, where appropriate to the local context and character." Amend Table 1 to reflect a more realistic housing supply. Allocate land south west and north east of

enable a more detailed assessment to be made of the contribution of sites likely to be permitted after 2006. However, as the current UCS makes estimates of completions rather than permissions, and given the evidence from the initial phase of monitoring, it is concluded that the Plan's estimates are realistic and, if anything, cautious.

Other Detailed Points

A few other detailed points of objection have been raised which are not already covered in the response above. Two respondents suggest that the reference in paragraph 6.8 to a density of 30-50 dwellings per hectare is too prescriptive. This is, of course, a direct reflection of Government advice, which seeks to avoid development of less than 30 dwellings per hectare. It would not, therefore, be appropriate to remove this reference or change the Plan's strategy in response to these objections. One respondent suggests that the current (1998) Plan's Proposal EN.1 should be retained. Issues relating to this policy are dealt with in response to representations on the Design and Development Principles Chapter (Issue 3).

Another respondent objects to the 'optimum' scenario being applied 'in a blanket way in Winchester'. The Chesterton Study advised that the 'optimum scenario' (assuming a maximum level of development) should be applied in the centre of Winchester due to its sustainability as a development location. This scenario is not, therefore, applied in a blanket way, but only to those parts of Winchester which are best served by facilities, services and public transport. The centre of Winchester is also where the most intense development is likely to be appropriate. The application of the 'optimum scenario' is, therefore, considered entirely reasonable.

Other respondents suggest that other types of 'good' opportunities should be identified and added to the Urban Capacity Study. The suggestions include parking areas and residential development of station car parks, building over railway lines, and the conversion of the majority of private and some other garages in the District to dwellings.

Parking areas are included in the study where they meet the criteria for good opportunities. However, car parks are a more sensitive issue. While some undoubtedly have potential for housing development, the Council has not resolved to release any for housing or other purposes at this stage. Similarly, Railtrack has not declared any of its car parks surplus to requirements and its comments on the Transport Chapter of the Plan suggest it wishes to increase, not decrease, its parking provision at stations. Accordingly, these options are not so likely to emerge as sources of supply that they would warrant being included as 'good' opportunities.

Building over railway lines is likely only to be feasible in a limited number of situations (e.g. within defined built-up areas) and could be expected to be economically viable in even fewer, if any. It could not, therefore, be realistically considered a good opportunity. Conversion of private and other garages to dwellings would only contribute to the housing supply if independent dwellings were created. Most garages are too small to be converted to independent dwellings and are often situated in positions that would make any enlargement difficult or undesirable. Where there is obvious capacity for conversion or

Winchester District Local Plan Review

Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation. **Change sought.**

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

Lovedon Lane, Kings Worthy for housing and include in Table 2.

redevelopment, opportunities may be identified in the existing survey, but this category of development is not one that it is considered appropriate or worthwhile to promote on any significant scale.

Humphrey Farms Ltd. (471/2)

Object to the implication that 5135 dwellings can be built through the Plan's approach. Support the principle of an Urban Capacity Study but object to the methodology used. Object to the 'blanket' application of the 'optimum housing scenario' to all central Winchester sites. Object to the under-provision of housing land throughout the Plan period, particularly the over-optimistic assessment of supply through Urban Capacity.

Change Proposed - Paragraph 6.9:

....The Urban Capacity Study ~~is~~ was published as a background document to the Local Plan (Winchester District Urban Capacity Study, Winchester City Council, 2001). An annual housing monitoring report will be produced to assess housing supply, taking account of planning approvals and housing completions. A full review of the Urban Capacity Study, including settlement re-surveys, will be undertaken every 5 years, with the first by 2006....

Change sought – *change the Plan to more accurately reflect the disadvantages of the MDA sites and change the Urban Capacity Study to reflect more closely Government guidance. Amend Table 2 to include land at Northfields, Twyford with an estimate of about 40 dwellings.*

George Wimpy UK Ltd. (473/8, 473/13)

The desire to resist development beyond the built-up areas is an artificial constraint that contradicts PPG3. The Urban Capacity Study is over-optimistic and the settlements covered should only be those that can contribute to sustainable development. A non-implementation rate should be applied to the Urban Capacity Study, especially due to reservations over sites such as garage courts, open spaces, sites in conservation areas and former EN.1 areas. The Study needs to be more realistic and accept some greenfield development. The West of Waterlooville MDA is not likely to be completed by 2011.

Change sought – *identify additional appropriately located housing sites, which should include Albany Farm, Bishops Waltham.*

Redrow Homes (474/8, 474/13)

The desire to resist development beyond the built-up areas is an artificial constraint that contradicts PPG3. The Urban Capacity Study is over-optimistic and the settlements covered should only be those that can contribute to sustainable development. The Urban Capacity Study should not assume that all sites will come

Winchester District Local Plan Review
Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

forward for development. The West of Waterlooville MDA is not likely to be completed by 2011.

Change sought – *identify reserve sites and a mechanism for their release in the event of housing land deficits. Extend the Winchester City (North) MDA Area of Search to include land off Worthy Road, Winchester.*

Persimmon Homes South Coast Ltd. (530/3, 530/9)

The Plan overestimates the amount of housing likely to be sourced from within the District's built-up areas. Settlements subject to H.3 should be excluded, as they are unsustainable. Some H.2 settlements are not good locations for development or are constrained by conservation areas or AONB. The policy changes proposed to achieve urban capacity may not be implemented. Many of the remaining sites are not realistic.

Change sought – *allocate greenfield sites to meet housing requirements.*

Bewley Homes (386/15)

The current Plan's EN.1 designations should not be removed as it is inevitable that higher density development will destroy the character of these areas in many instances.

Change sought – *reappraise the application of EN.1 and only remove it where higher density development would not harm character.*

Bewley Homes Plc. & R C H Morgan-Giles (227/5)

The housing strategy is flawed as it is over reliant on the Urban Capacity Study. This is based on 'theoretical' capacity, fails to provide any practical means of assessing whether the housing potential is deliverable and does not form part of the statutory development framework. The Plan fails to identify how necessary infrastructure requirements will be met e.g. community/health facilities, playing fields, schools.

Change sought – *identify those sites relied on to meet strategic housing requirements, acknowledge the need to allocate sites in sustainable settlements and the role of greenfield sites in delivering infrastructure improvements.*

Winchester District Local Plan Review
Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

V Scappaticci (1193/2)

Object to the assumption of the Urban Capacity Study with regard to potential residential development at Twyford. Twyford is already very tightly developed and with a desperate need for affordable housing. A better alternative would be to develop the land North of Hare Lane, Twyford.

Change sought – *develop land north of Hare Lane, Twyford.*

A Foster (878/6)

The Plan does not comply with PPG3 in that sites identified in the Urban Capacity Study are not shown on the Proposals and Inset Maps.

Change sought – *include as housing allocations sites of, say, 0.5ha. with potential for development in the Plan period, such as land south of Quarry Road, Winchester.*

D Steel (53/2)

The principle of identifying privately owned sites for housing where the owners have not been approached appears to be flawed.

Change sought – *more housing should be made available within the countryside instead of all of the housing within existing built-up areas.*

Mr & Mrs Blaxland (1378/1)

The urban capacity figure of 2,117 dwellings anticipated includes a reliance on development of areas formally protected as important amenity open space. Specifically object to inclusion of the open space at Dyson Drive/Francis Gardens in the Urban Capacity Study. The site is not needed for development as completions may prove to be higher than estimated

Changes sought – *delete reference to the City Council accepting development of areas of open space to meet housing requirements.*

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

Issue 6.5

H.1/Paragraphs 6.8 - 6.24

Housing Supply – **Allocations/Commitments**

Representation:

Rookesbury Estate Ltd. (235/1)

Object to the inadequate provision of housing in rural areas with only a nominal amount of affordable units likely to be provided. The presumption of the allocated sites being completed by 2002 is ill-founded. There can be no certainty that the urban capacity sites will come forward so more greenfield sites should be allocated for housing.

Changes sought – amend Table 1 to: Urban Capacity - 2000

Existing commitments/allocns – 3227 Additional Allocations – 418

CALA Homes (South) Ltd. (468/28)

The Plan's strategy is over-reliant on carrying forward existing greenfield allocations from the previous Local Plan without reviewing them in accordance with PPG3.

Changes sought – not specified.

CALA Homes Ltd. (468/32, 468/33)

Object to paragraph 6.21 on the basis that the guidance contained within PPG 3 requires that existing allocations should be reviewed in accordance with the criteria contained in the sequential approach and deleted if necessary.

Changes sought – not specified.

CALA Homes Ltd. (468/34)

Object to the suggestion in paragraph 6.24 that land at Area 2 Whiteley will be released in preference to the reserve MDA requirement. This is in direct conflict with Structure Plan Policy H4 that identifies the specific locations within Winchester at which sites should be allocated to meet this reserve requirement. PPG3 also makes it clear that allocations in previous Local Plans should be reviewed in accordance with the guidelines contained therein. There is no evidence that this process has been undertaken in this instance.

City Council's Response to Representation

Some respondents suggest that the 'other allocated/ committed' category of sites will not come forward or point to alleged inconsistencies in the figures for these sites between Table 1 and 2 of the Local Plan.

Several respondents suggest the Plan should not have carried forward existing allocations without reviewing them in accordance with PPG3. In fact, the existing allocations were all reviewed, in terms of whether they should be carried forward and what their estimated capacity should be. All the sites except Whiteley Green, Whiteley had planning permission so could not be 'unallocated' even if this were felt desirable. The Plan does however propose that the greenfield site that does not yet have planning permission should be held back in favour of development within existing settlement boundaries, unless needed to provide an adequate housing supply.

Hampshire County Council publishes an annual 'Housing Land Supply in Hampshire' monitoring report which sets out all local plan allocations and planning permissions for sites of 10 or more dwellings at April each year. The latest version has a basedate of April 2001 and can be used to update Table 2 of the Local Plan (Supply from Allocated Sites) and to produce a list of other commitments. The situation on allocated sites is described on a site-by-site basis below .

Knowle Hospital. Housing Land Supply in Hampshire 2001 estimate = 496 (500 gross), Local Plan Table 2 estimate = 575. At Knowle Hospital the original estimate of 500 units (496 net) is likely to be exceeded as detailed proposals for each phase are approved. The site is subject to an outline permission and several phases have yet to be approved in detail. These include some of the lower density areas, which may increase in density to reflect PPG3 advice. The figure of 575 dwellings in total is, therefore considered to be still the most likely capacity of the site.

West of Waterloo. The Structure Plan (Review) requires 2000 houses to be provided at West of Waterloo. As noted below, this is considered to be achievable and this figure should be retained in Table 2 (see Issue 6.7 below).

Mill Close, Denmead. Housing Land Supply in Hampshire 2001 estimate = 11, Local Plan Table 2 estimate = 20. Planning permission has now been granted for 11 dwellings on part of this site. As the remaining area of the site appears to be subject to land ownership constraints, the figure of 11 units (which are currently under construction) seems the most realistic.

Forest Road, Denmead. Housing Land Supply in Hampshire 2001 estimate = 65, Local Plan Table 2 estimate = 80. The figure of 65 units is based on the adopted (1998) Local Plan allocation. This site now has detailed planning permission for 88 dwellings and construction is likely to start soon. Table 2 should, therefore, include an estimate of 88 dwellings.

Whiteley Farm, Whiteley. Housing Land Supply in Hampshire 2001 estimate = 400, Local Plan Table 2 estimate = 400. On the basis of recent permissions and negotiations the estimate of 400 appears realistic, although it may be slightly exceeded. It should, therefore be retained at least for the time being.

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation. *Change sought.*

City Council's Response to Representation *Change Proposed*

Change sought – not specified.

Estates Practice, Hampshire County Council (1434/28)

Support the rolled forward allocation of Whiteley Green, Whiteley as one of the "allocated" greenfield housing sites under Proposal S.19.

Changes sought – none.

Estates Practice, Hampshire County Council (1434/43)

On Inset Map 46, it appears that part of the previous allocation that was covered by Proposal NC.4 of the current Local Plan (Whiteley Green) has been omitted.

Change sought – include this triangle of land as part of the new Proposal S.19.

CALA Homes (South) Ltd. (220/7)

Object to the inclusion of Area 2 Whiteley (S.19) as an allocated site. ***Changes sought*** – delete area 2 Whiteley as an allocated site in Table 2 and replace with land at Littleton.

Wickham Parish Council (1431/1), Cala Homes (South) Ltd. (468/34).

Object to Area 2, Whiteley being brought forward for development in preference to the release of 'reserve' provision at West of Waterlooville or Winchester City (North).

Change sought – no further development at Whiteley until improvements are made to the infrastructure, in particular Whiteley Way.

Whiteley Green, Whiteley. Housing Land Supply in Hampshire 2001 estimate = 60, Local Plan Table 2 estimate = 90. The Local Plan's higher estimate is based on the fact that this site does not currently have planning permission and, therefore any future scheme will need to accord with PPG3 and Local Plan density requirements. This is expected to result in a scheme of about 90 units.

There is some support for the inclusion of the Whiteley Green allocation. Other respondents suggest that this site should be excluded from Table 2 as the Local Plan suggests that it should not be released for development if adequate land is available within settlements, or because they wish to see alternative greenfield sites allocated instead. The Local Plan's approach is adopted because the site is the only greenfield allocation without planning permission and therefore the only site that can be held back in favour of sites in built-up areas, in accordance with the 'sequential' approach. Although the Plan suggests that the site may be held back, it does not prevent it from being developed during the Plan period, if needed. It is, therefore, considered that it should continue to be included in Table 2.

Despite the fact that it is a greenfield site, the site is now very much part of the settlement area of Whiteley, being surrounded on all sides by recent housing development or the M27 motorway. It is not, therefore, considered appropriate to 'unallocate' the site or to allocate a replacement site elsewhere. Not all of the Whiteley Green area allocated in the current (1998) Local Plan is carried forward in the new allocation because most of the former allocation has now been developed. If there are other smaller areas around the site that are developable, the Plan allows for this within the terms of Proposal H.2.

Broadway/Friarsgate, Winchester. This large site in the centre of Winchester was not included as an allocation (or urban capacity site) in the Deposit Local Plan. However, a draft Planning Brief has since been published for the site, indicating that it has substantial capacity for housing development, as well as retail and other town centre uses. It is proposed that the site should be allocated for mixed use development in the Revised Deposit Local Plan (see Issues relating to Chapter 11, Winchester) and it is, therefore, appropriate to add the site to the list of allocated sites from which housing supply is expected to arise (Table 2). The capacity of the site is estimated at 100 dwellings.

Taking account of the considerations discussed above, it is proposed that Table 2 be updated. This would result in a new total of 3,264 dwellings on allocated sites, including West of Waterlooville MDA (compared to 3,165 dwellings in the Deposit Plan's Table 2).

One respondent highlights a discrepancy between the figures for 'Existing Commitments and Allocations' in Table 1 of the Plan (3227 dwellings) and the total supply in Table 2 (3165 dwellings). The difference is because the Table 1 figure includes 'commitments' as well as allocated sites, whereas Table 2 relates only to allocations. To get a complete picture, account should be taken of commitments (sites of 10 or more with planning permission) as well as allocations. The Housing Land Supply in Hampshire 2001 document indicates the following commitments at April 2001, excluding the allocated sites

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation. *Change sought.*

City Council's Response to Representation *Change Proposed*

already discussed above:

Site	Dwelling gain
75-79 Eastgate Street, Winchester	10
St Pauls Hospital, Winchester	20
Pigeon House Yard, Sutton Scotney	13
14 Bereweke Road, Winchester	12
Chilbolton Court, Sarum Rd, Winchester	37
R/o 52-72 Lovedon Lane, Kings Worthy	13
26-27 Staple Gardens, Winchester	7
1-39 Makins Court, Alresford	15
Blackmans Yard, Bishops Waltham	12
Tyrella Club, Bishops Waltham	14
Evans Halshaw, Hyde Street, Winchester	47
20 St Peters Street, Winchester	11
Abbots Barton House, Winchester	12
South of Spring Lane, Swanmore	16
29 City Road, Winchester	9
Hill Coppice, Whiteley	19
Houghton Mill, Durley	10
TOTAL	277

NOTE: Figures relate to dwellings remaining to be built on each site at April 2001. Figures are net gains (excluding replacements for existing dwellings).

10 of the 17 sites listed above were under construction in April 2001 and it is possible to be very confident about their contribution to housing supply (175 dwellings). Most of these are now completed and other sites have started. It is extremely unlikely that any of these sites will not be completed during the Plan period and they should all be added to allocated sites and included in the commitments category of Table 1.

The **total of existing committed and allocated sites at 2001 is, therefore, 3,541** (3,264 allocations + 277 commitments). These should be added to an updated Table 1, along with the estimates for urban capacity (2030) and Living Over the Shop (99), giving a **total housing supply 2001-2011 of 5,570** (including West of Waterlooville MDA). This compares to a remaining Structure Plan requirement of 4,905 dwellings (including the MDA). The level of over-provision (+14%) is substantial and even greater than the 10% typically promoted as a 'margin of error' by development interests in the past. There is, therefore, no case for a 'margin of error' allowance and the above figures demonstrate an adequate supply for the whole Plan period. Accordingly, any allocations of greenfield sites or settlement boundary/ development frontage changes are not warranted.

Change Proposed - Paragraph 6.11:

...Table 1: Sources of Housing Supply

<i>Sources of supply at April 2000 2001</i>	<i>Estimated number of dwellings</i>
Urban Capacity (good opportunities)	2447 2030
'Living over the shop'	400 99
<u>Existing Commitments & Allocations*</u>	<u>3227</u> 3541
TOTAL	5453 5570

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

** = includes 2000 dwellings at West of Waterlooville.*

Details of the urban capacity sites identified, estimated capacity and methodology are contained in the Winchester Urban Capacity Study, 2001 and subsequent monitoring reports.

Change Proposed - Paragraph 6.15:

.....The Plan does, however, address the current surplus of industrial land within the District and makes provision for a mix of uses on some of the employment allocations made under the current District Local Plan. ~~Proposal E.2 also sets out criteria against which to judge proposals involving the loss of existing employment sites.~~

Change Proposed - Paragraph 6.21:

Table 2: Estimate of Housing Supply from Allocated Sites

Site	Proposal no.	Estimated no. of dwellings
Knowle Hospital	NC.1	575
West of Waterlooville	NC.2	2000
Mill Close, Denmead	S.11	20 11
Forest Road, Denmead	S.12	80 88
Whiteley Farm, Whiteley	S.18	400
Whiteley Green, Whiteley	S.19	90
Broadway/Friarsgate, Winchester		100
Total		3465 3264

Issue 6.6

H.1/Paragraphs 6.8 - 6.24

Housing Supply - Major Development Areas - General

Representation:

Micheldever Parish Council (1212/2)

Support Proposal H.1 in that Micheldever Station has not been included to meet the housing requirements of the Hampshire County Structure Plan Review.

Change sought – none.

Southern Planning Practice (475/2)

Object to new communities as not conforming to PPG3 or meeting the needs of the District.

Change sought – not specified.

Linden Homes Developments (503/1, 503/4, 503/8, 503/11)

The MDAs have not been subject to the search sequence required by PPG3. It is not sufficient for the WDLPR to import the MDAs from the Structure Plan and use them as the starting point for housing provision. The Plan overestimates the

City Council's Response to Representation

The support is welcomed.

The new communities proposed in the Local Plan are either now committed and under construction (Knowle), or Major Development Areas required by the Hampshire County Structure Plan (Review) (West of Waterlooville and Winchester City North). Whilst some respondents claim that the Structure Plan did not undertake the sequential test required by PPG3 (as it was prepared before PPG3), it did adopt a similar approach. This sought to maximise the use of land in built-up areas, then to identify the most sustainable urban extensions (MDAs), and finally required an additional element to be allocated through district-wide local plans (urban capacity studies have since shown that most of this can be accommodated in existing settlements).

The Government Office for the South East (GOSE) has confirmed in writing that it is satisfied that the Structure Plan accords with PPG3's principles and the Government Office and former DETR were closely involved in determining the Structure Plan's approach to accommodating development. It is, therefore, concluded that there is no justification for revisiting the Structure Plan's requirements, even if it were legitimate for a local plan to do so, which it is not.

Some respondents suggest that the Local Plan should replace one or both of the MDAs identified in the Structure Plan within Winchester District with alternative sites. These sites have been rejected by the strategic planning authorities in adopting the Structure Plan. The Local Plan must be in general conformity with the Structure Plan and

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

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

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

amount of housing provision that is likely to be made available during the Plan period. Not all the settlements are good locations for new development. Waltham Chase is a sustainable location for new housing development.

Changes sought – *subject to testing the MDAs against PPG3 an alternative housing strategy may be necessary. Allocate Waltham Chase as a suitable location for housing.*

Alfred McAlpine Developments Ltd. (360/4)

The reliance upon 2 “areas of search” will not bring forward the required reserve number of sites, if these additional dwellings are necessary.

Change sought – *allocate additional land for development, that is suitable for development without major new infrastructure and can be brought forward early in the plan process. The site at The Lakes in Swanmore is a suitable site for inclusion.*

R Stubbs (302/1)

The concept of identifying “reserve sites” was not debated at the Structure Plan EIP. Such sites must be genuinely available to ensure that yield will be achieved quickly. The provisions made the will fail that essential pre-requisite because the land is no more than extensions of other very large development proposals, which themselves will be subject to delay.

Change sought – *if the Plan must follow the “reserve site” concept then it is vital that the sites identified are available quickly.*

Bewley Homes (386/12), Bryant Homes Ltd (397/7)

The approach offers uncertainty to the development industry. The “areas of search” do not take account of the time necessary to review the local plan, plan for new housing sites and the lead-in times for such developments.

Change sought – *make provision for the reserve sites within the local plan otherwise there will be a substantial under-provision of dwellings.*

CALA Homes Ltd. (468/26)

cannot change fundamental aspects of its development strategy, even if it wanted to. The Structure Plan was adopted following the proper processes and any EIP Panel recommendations that may have supported alternative MDA locations were taken into account but rejected, as the strategic authorities are entitled to do. Had there been any irregularity in the procedures, the objectors would no doubt have exercised their option to challenge the Structure Plan in the Courts. The Local Plan is not the vehicle for doing this and it is quite inappropriate for it to do anything other than seek to conform to the adopted Structure Plan.

One respondent suggests the Plan should have regard to the changing policy background emerging from the second review of the Structure Plan. The Local Plan must be in general conformity with the adopted Structure Plan and there is no second review Structure Plan yet published which it could have regard to. Any assumptions made at this stage of the Local Plan process would be purely speculation and form a totally inappropriate basis from which to develop the Local Plan.

Several respondents question either the Structure Plan's ‘reserve site’ approach or the Local Plan's ‘areas of search’ for reserve provision. The ‘reserve site’ approach in the Structure Plan was subject to the necessary procedures and was discussed and supported by the Government Office and the (then) DETR. The Structure Plan was not ‘called in’ by the Secretary of State nor challenged in the Courts and it must, therefore, be taken as the legitimate adopted Structure Plan, with which the Local Plan has to conform.

The City Council has always indicated that the ‘areas of search’ were an interim measure in the complex process of identifying and planning for the reserve housing provision. To have delayed the Local Plan process until detailed site boundaries were identified for the reserve provision would have led to hold-ups of at least 18 months in the Local Plan process. Not only would this have affected the ability to plan for other development requirements, including the ‘baseline’ MDA at Waterlooville, it would have delayed other important policy changes to reflect Government advice and local needs (e.g. urban capacity approach, affordable housing policies, etc).

The ‘area of search’ approach was, therefore, considered an appropriate way to allow the Local Plan to progress, while undertaking work on the reserve requirements, and was certified by the strategic planning authorities as generally conforming to the Structure Plan's requirements. Further work has progressed, enabling sites to be identified for the reserve provision at West of Waterlooville and Winchester City (North) and it is proposed that the ‘areas of search’ should not therefore be carried forward. The detailed objections to issues concerning the reserve sites are considered in response to objections to Proposals NC.2 (West of Waterlooville) and NC.3 (Winchester City North).

The mechanism for triggering the reserve provision is for the strategic planning authorities to devise and operate. The authorities have produced and adopted supplementary planning guidance on implementing Structure Plan Policy H4, which sets out how housing

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

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

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

Object to the use of the phrase "present uncertainties concerning the possible future need for additional reserve provision at West of Waterlooville and/or a reserve major development area at Winchester City (North)". There is no guidance allowing Local Authorities to adopt an "area of search" approach to the allocation of reserve sites.

Change sought – not specified.

Hawthorne Kamm Ltd. (374/6)

The "areas of search" do not take account of the time necessary to review the local plan, plan for new housing sites and the lead-in times for such developments. It is not clear who will be responsible for the master planning of the MDA.

Changes sought – additional sources of land supply need to be highlighted to ensure that there is an adequate supply of housing. Clarify who would be responsible for the master planning of the MDA.

Strutt & Parker (877/11)

There is no formal mechanism to 'trigger' the release of the reserve MDA. Criteria for the release of the provision should be scrutinised through the local plan enquiry.

Change sought – include criteria and monitoring mechanisms to be implemented to assess the need for release of the 'reserve' MDA.

Grove Farms Ltd. (314/2)

Object to the fact that the commitment to developing North Whiteley has not been carried forward into the Deposit Plan.

Change sought – provide for further development at North Whiteley.

North Whiteley Consortium (322/1)

Object to the area of search being identified north of Winchester City. Wish to see the allocation of Land at North Whiteley in this policy as a MDA area of search.

Change sought – delete the words, "Winchester City (North)" and insert "North Whiteley".

North Whiteley Consortium (322/2)

The Local Plan identifies the reasons why West of Waterlooville was identified as a

requirements will be monitored and how sites would be triggered, if necessary. The first two annual monitoring reports have been approved by the authorities, recommending that no reserve sites need to be released yet. The authorities did, however, highlight the need for Districts to bring forward proposals for the 'baseline' MDAs and to plan for all of the reserve provision.

As part of the work on planning for the MDA(s) there has been liaison with the relevant health authorities and this is well advanced at West of Waterlooville. The Plan's Proposal NC.2, relating to West of Waterlooville, requires the provision of adequate facilities and services to serve the new community, including health facilities. The requested liaison is, therefore, taking place and it is not considered necessary to amend the Plan to refer to it further.

Change Proposed - Paragraph 6.6:

....The implications of this for the Local Plan will depend on the stage in the adoption process that has been reached, if and when a decision to release the reserve provision is made. ~~The issue of an alteration to the Local Plan Review might then arise, depending on the extent to which the Local Plan anticipates any need to release reserve provision. On the basis of the present uncertainties concerning the possible future need for an additional 'reserve' provision at West of Waterlooville and/or a reserve Major Development Area at Winchester City (North), the Local Planning Authority intends only to identify "areas of search" for reserve housing provision at this stage. The Local Plan identifies the location of the reserve provision and sets out requirements relating to it, including the need for the production of masterplans, in Proposals NC.2 and NC.3.~~

Change Proposed - Paragraph 6.7 (last bullet point):

- *~~the identification of 'areas of search' sites at West of Waterlooville and Winchester City (North), in response to the possible need to allocate further housing land, as part of the Hampshire County Structure Plan Review's 'reserve' provision.~~*

Winchester District Local Plan Review
Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

MDA but the reasons for identifying this MDA are virtually the same as the Structure Plan EIP Panel's reasons for recommending North Whiteley. No similar reasons have been given in the deposit local plan why Winchester City (North) has been identified.

Changes sought – delete "Winchester City (North)" and replace with "North Whiteley" in Paragraph 6.5.

Eagle Star Estates Ltd. (352/1, 352/4)
Micheldever Station Market Town should be identified as a major development area and is a more viable MDA than Winchester City (North). Oppose 'reserve' housing provision at West of Waterlooville and Winchester City (North). The Council's response should reflect the changing planning policy context which will occur with the forthcoming Structure Plan Review. The proposal could also adversely affect the proposed South Downs National Park.

Change sought – delete areas of search at Winchester City (North) and West of Waterlooville and undertake a proper evaluation of MSMT. An assessment using the Council's matrix shows MSMT scores better as an MDA location than Winchester (North).

NHS Executive SE Region (452/9)
Significant housing development and additional housing through the 'reserve sites' will have implications for health care across the District. It is important that Councils liaise with NHS Trusts and the Health Authority to identify provision required, both on and off-site, for health-care needs.

Change sought – include evidence in the Plan that an assessment has been carried out in liaison with NHS Trusts and the Health Authority.

Issue 6.7
H.1/Paragraphs 6.8 - 6.24
Housing Supply – Major
Development Areas – West of
Waterlooville

Representation:

City Council's Response to Representation

The general support is welcomed. The boundaries of the proposed MDA are considered further in response to objections to Proposal NC.2.

A number of respondents doubt that the 2,000 dwellings sought by the Structure Plan by 2011 at West of Waterlooville will be developed.

It is only the West of Waterlooville MDA that forms part of the

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation. **Change sought.**

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

Grainger Trust Plc. (214/10)

Support the principle of allocating approximately 2,000 dwellings in the form of a new community to the west of Waterlooville. Concerns regarding the detailed boundaries of the area identified for development.

Change sought – *greater flexibility is given regarding land West of Purbrook. Some land within the 'area of search' may be appropriate for development earlier on.*

'baseline' housing provision (2000 dwellings) in this District. The likelihood of the MDA not providing the housing sought by the Structure Plan Review has been considered and the estimated level of completions is as follows:

Year	Estimated Dwelling Completions
2005/06	100
2006/07	200
2007/08	400
2008/09	500
2009/10	500
2010/11	300
Total	2000

Holmes & Sons (287/7)

Disagree with statement in paragraph 6.4 that all 2000 dwellings at the Waterlooville MDA will be completed by 2011. If not, then the balance of requirement will be increased.

Change sought – *amend paragraph 6.4 final sentence to read: 'Provided this requirement can be fulfilled by 2011, then 3135 dwellings will be needed on other sites....'*

The above rates of development have been shown to be achievable on other large development areas in Hampshire. Whether the development is achieved by 2011 will be largely dependent on the actions of the landowners and developers, which are outside the control of the local authorities. If land is held back by landowners/developers, that should not be used to justify other land being released instead.

Chesterton Plc (221/1)

Dispute that the MDA to the West of Waterlooville will provide the assumed 2000 new dwellings within the time period specified. If the Winchester District Local Plan were adopted in 2006, this would only leave 5 years for the delivery of 2000 new dwellings, which is not possible.

Change sought – *review Proposal H.1 to provide a realistic assessment of the number of new dwellings that could be provided in the MDA. Additional housing allocations are needed outside the MDA's and in addition to Area 2 at Whiteley.*

The MDAs are a strategic measure to meet housing needs in particular parts of the County: south-east Hampshire in the case of West of Waterlooville. The fact that a large part of this MDA falls within Winchester District is an accident of administrative boundaries, as it is intended mainly to meet the needs of south-east Hampshire Districts such as Portsmouth, Havant and Gosport. While the Local Plan facilitates the development of this strategic requirement, it is primarily for the strategic planning authorities to monitor its progress and to decide what is the proper response in the unlikely event of any shortfall. It is not expected that that this would involve alternative provision within Winchester District, as there is no other location in the District that is well-related to any sizeable south-east Hampshire settlement. It would, therefore, not be appropriate to provide for any (unlikely) shortfall at West of Waterlooville as an addition to the Local Plan's existing housing requirement.

Mr Wickham (257/2)

It is unrealistic to think that 2000 units West of Waterlooville will be delivered during the Plan period. If the reserve allocation of 1,000 dwellings is triggered, these housing numbers become even more optimistic.

Change sought – *smaller allocations should be made to meet shortfalls in housing supply.*

With regard to respondent 1158's comment, the Local Plan (and the Structure Plan) have undertaken assessments of urban capacity and sought to make full use of this source of supply. The MDAs are promoted as the next most sustainable solution, in accordance with the sequential approach of PPG3, which promotes sustainable urban extensions after the use of previously developed land.

Change Proposed – *none.*

S Wallis (1158/1)

The Local Plan fails to recognise or meet the requirement for new housing provision in existing urban areas.

Winchester District Local Plan Review **Analysis of Representations on the Deposit Plan**

CHAPTER 6: HOUSING

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

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

Provision of a new urban development of 2000 houses West of Waterlooville does not follow Government policy relating to sequential testing.

Change sought – examine housing needs at a more refined level to provide new housing in accordance with both the need for and type of housing in particular areas.

Issue 6.8

H.1/Paragraphs 6.8 - 6.24 **Housing Supply – Major** **Development Areas –** **Winchester City (North)**

Representation:

R Cowen (258/1)

With regard to the additional requirement of the County Structure Plan for the release of a 'reserve' housing provision, the site to the east of the M3 is equally suitable as a reserve MDA.

Change sought – add "...or east of the M3 at Junction 9...." to Proposal H.1(ii).

C York (336/4)

The strategic requirements are based on projected housing numbers that undermine planning objectives for the countryside, transport and Winchester. The strategic housing requirement should be absorbed by already existing urban sprawls in and around Southampton and Portsmouth.

Change sought – delete references to Winchester City (North) as a MDA.

Winchester and Havant District Group, CPRE (1387/6)

The Winchester City (North) reserve MDA is premature and takes no account of the opportunity to meet all or part of the housing requirement within urban areas and the cities of Southampton and Portsmouth.

Change sought – if for any reason MDAs must be defined in the Plan, a statement should be included to the effect that: "These sites will be kept under review in the light of the results of ongoing Urban Capacity Studies..... and will be withdrawn whenever it is clear that

City Council's Response to Representation

The detailed objections to the reserve MDA at Winchester City (North) are dealt with in response to objections to Proposal NC.3, along with challenges to the assessment of alternative locations for the reserve MDA (the assessment matrix).

The Structure Plan is clear that local plans must provide for the development of the 'reserve sites' by identifying them and including appropriate policies. The Local Plan's approach of identifying an 'area of search' was a step in this process. The Local Plan is required to be in general conformity with the Structure Plan and it is not possible, therefore, to accept the course suggested by those respondents who do not wish the Plan to provide for any development at Winchester City (North).

Although several respondents suggest that to plan for the reserve MDA is premature, it will be the strategic planning authorities, not the local planning authority, which decides the appropriate timing of any release (if it is needed at all). The Structure Plan does, however, require local plans to provide for the reserve sites' development and it is apparent from the work on West of Waterlooville that an MDA cannot be triggered and planned properly overnight. The Local Plan's approach enables the proper planning of the area, if it needs to be developed, rather than an approach that is either rushed or unduly dominated by development interests.

The ability of urban areas, or smaller built-up areas, to provide urban capacity sites will be a crucial factor in determining whether reserve sites need to be 'triggered'. This has been indicated by the strategic planning authorities' monitoring reports, which conclude that urban capacity is likely to meet housing requirements for the time being, but are cautious about whether this situation will prevail over the whole Structure Plan period.

Whether the City Council opposed the Winchester City (North) reserve MDA or not (which it did), the Structure Plan has now been approved and the Local Plan is required to implement its provisions. The Local Plan must, therefore, provide for the possibility of major development to the north of Winchester. The question of whether the 'area of search' identified is the right one is considered in detail in response to objections to Proposal NC.3, but the various factors raised as objections in the responses were all incorporated in the process of defining the area of search. It is recognised that further work is needed to define a development area and this has been undertaken (see response to objections to Proposal NC.3).

Winchester District Local Plan Review
Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

their development will be unnecessary to meet the housing provision”.

Change Proposed – none.

S English (1401/2), M Butterworth (1402/2), M Raw (1403/2), J Wong (1404/2), C Butterworth (1405/2), J Foreman (1406/2), J Langon-Mudge (1407/2), B Langon-Mudge (1408/2), N McPherson (1409/2), P Stubbs (1410/2), J Barnett (1411/2), C Eames (1412/2), J Cullen (1413/2), G Cox (1414/2), G Wickes (1415/2), E Bull (1416/2), G Denham (1417/2), S Early (1418/2), S English (1419/2), S Keigher (1420/2), J Foreman (1421/1).

The strategic housing requirements and reserve housing requirement undermine planning objectives for the countryside, transport and for Winchester. Southampton and Portsmouth should not be able to make decisions that ruin Winchester. Any reserve provision should be absorbed into existing urban areas around Southampton and Portsmouth.

Change sought – *delete all references in the Plan to Winchester City (North) MDA and, should the 2,000 dwellings be needed, they would be more appropriately absorbed within the cities of Southampton and Portsmouth.*

J Gumbel (989/1), G Pope (995/1), E Moore (1369/1).

Object to a specific 'area of search' at Winchester City (North) because Policy H4 of the Structure Plan Review has only recently been published, so that the need for such a housing provision is far from established. Need for further detailed studies and assessments of landscape, traffic and flooding, etc.

Change sought – *reword Proposal H.1(ii) to indicate that any identification of an area of search at Winchester City (North) will be deferred for at least 5 years to allow time for further essential studies of potential impact to be carried out.*

C Tripple (1003/1)

The 'area of search' and the reserve housing provision is premature. An MDA would increase traffic and compromise the special character of Winchester, contradicting other sections of the Plan.

Winchester District Local Plan Review
Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

Change sought – defer consideration of this area of search until 2006. Remove the designation of Winchester (North) for reserve housing provision for an MDA.

M Charrett (1370/1)

The City Council should have opposed the concept of an MDA at Winchester North at the Structure Plan stage. By naming Barton Farm, the fate of the site has been sealed, resulting in unsustainable development that Winchester's infrastructure cannot support.

Change sought – remove from the Local Plan any reference to a specific reserve site.

Littleton and Harestock Parish Council (879/4)

Object to Proposal H.1(ii) due to the effect on Winchester and its historic landscape. Winchester should be afforded the protection as highlighted within the Regional Planning Guidance. The location of 2,000 to 3,000 houses in the Barton Farm MDA will have a major detrimental effect on traffic. There will be loss of agricultural land at Barton Farm, which is considered by the former MAFF as "best and most versatile". The development would increase the number of dwellings in the City by 20-25%. The matrix used is flawed.

Change sought – not specified.

J Pope (892/3)

The reserve provision of 2000 at Winchester City (North) would spoil the character of the north of Winchester and have a serious impact on the facilities and services within the rest of the City.

Change sought – remove the proposals to introduce 2000 new houses in North Winchester.

D Briggs (967/4)

Object to Winchester City (North) because the increased number of houses will draw people in from other parts of the country, reduce the special quality of the views from key vantage points and may act as a disincentive to many tourists.

Change sought – delete reference to Winchester City (North)(or any other greenfield site around Winchester) as an

Winchester District Local Plan Review
Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

MDA.

J Sheeran (987/1)

The selection of Winchester City North as an MDA is seriously flawed and wholly inappropriate.

Change sought – *remove the MDA from the Local Plan.*

J Davidson (1145/1), J Pope (1163/1)

Object to the proposal for building 2000 houses at Barton Farm, on the grounds that Winchester's existing infrastructure could not support the extra population. New infrastructure would be costly and change the 'contained' nature of Winchester.

Change sought – *remove the proposed MDA at Barton Farm from the Plan.*

G Fothergill (1001/1) (Councillor)

Object to 2000 dwellings at Winchester City North, which is contrary to Proposal W.1 as it is detrimental to the "landscape setting" of Winchester, will have an overbearing impact on nearby neighbourhoods, will exacerbate congestion, will put a big strain on the local education facilities, and would use good agricultural land and discourage the search for brownfield sites.

Change sought – *give greater emphasis to, and reliance upon, brownfield sites and additions to village settlements.*

J Greenleaf (1127/1)

Strongly oppose the plan for Winchester to have a vast number of additional houses. Do not care if it is a Government directive to build 50,000 new homes, it is time to say 'no'. The problem should be tackled at a fundamental level, by controlling population increase and restricting immigration.

Change sought – *remove from the Plan the huge growth in additional housing.*

F Woodwark (1154/1)

There is no need for this development in Winchester. Efforts should be concentrated on brownfield sites such as Peninsula Barracks, which is very successful.

Change sought – *remove Winchester City (North) MDA and concentrate on brownfield sites.*

Winchester District Local Plan Review
Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

J Bradshaw (1168/1)

The Winchester City (North) MDA would spoil the character and environment of the area. Winchester does not have employment opportunities to support such extra housing. We do not need 2000 extra houses. Such development could lead to flooding elsewhere in the City.

Change sought – not specified.

J Schute (102/2)

The proposed MDA would spoil the character and environment of Winchester which does not need 2000 extra houses. There would be a massive increase in car usage for which the necessary infrastructure does not exist. Housing should be built on brownfield not greenfield sites.

Change sought – remove the Barton Farm site as an MDA.

Save Barton Farm Group (175/9)

The proposed MDA would have a detrimental effect on Winchester and the city's historic landscape setting. This view has been supported by Regional Planning Guidance in 1994, WCC Planning Department in 1994 and a Planning Inspector's report in 1997 in response to an objection in the Local Plan proposing 450 dwellings on this site. The site has never been subject to proper consideration at public enquiry or subject to an environmental assessment. There have been several legal errors in aspects of HCC's decision-making over the inclusion of WCN in the Hampshire Structure Plan. There is no justification for the loss of Grade 2 and Grade 3 agricultural land and the resultant loss of a green wedge into the city. The development would place new pressures on services and the quality of life of people in Winchester and would have major implications for traffic.

Change sought – remove the Barton Farm site as an MDA.

C Rice (1152/2), B Rice (1032/2)

Oppose proposals for North Winchester MDA because of the lack of infrastructure, flooding risk, no evidence of any environmental surveys being

Winchester District Local Plan Review

Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation. *Change sought.*

City Council's Response to Representation *Change Proposed*

undertaken and public rights of way would be lost. Additionally development should concentrate on brownfield sites as there is nothing to stop the whole site being developed once the first 1000 have been built.

Change sought – remove proposals for an MDA North of Winchester.

Issue 6.9

Urban Capacity Study – Site Specific Issues

Representation:

L Channon (84/1), R A Greenlees (85/1), Mr & Mrs Mclean (127/2), Mr & Mrs Walton (126/1), Bishops Waltham Society (212/14), R Shepherd (992/1), E Cole (1309/1), E Pickering (1310/1), P J Smith (1311/1), E Webb (1312/1), D Smith (1314/1), P Ifold (1315/1), J Button (1316/1), D J Blundell (1317/1), D Button (1318/1), L Ifold (1319/1), J Spicer (1320/1), J Watts (1321/1), R & L Bolton (1322/1), Mr & Mrs Adam (1323/1), M Luff (1324/1), C Ifold (1325/1).

Land at Morley Drive/ Langton Road, Bishops Waltham should not be identified as suitable for housing within the Urban Capacity Study. This area was provided as an open space when the existing development was built and its loss would exacerbate the existing shortfall of play space in Bishops Waltham.

Change Sought – remove the site (number 37) from the Urban Capacity Study and retain as open space, reducing the urban capacity estimate in Table 1 accordingly.

Mr & Mrs Mclean (127/1), D J Barclay (128/1), P N Barclay (129/1), Bishop Waltham Society (212/15), M Dean (1313/1), J Buckingham (1328/1), C Buckingham (1329/1). The lock-up garages in Cunningham Avenue and Pondside, Bishops Waltham, do not meet the criteria for “good” urban capacity likely to come forward for development as they are in separate private ownership. There is no other parking available and if development incorporated replacement

City Council's Response to Representation

This section deals with site-specific objections to the Urban Capacity Study. Only representations that were related to the Local Plan have been accepted as duly-made. Other representations have been received relating only to the Urban Capacity Study and these are dealt with at Issues UCS1 – UCS4, although most relate to the sites discussed below. It should be noted that the identification of a site within the Urban Capacity Study indicates that it is considered to have good potential for development, but does not equate to allocating the site for development. Equally, the fact that a site may not be identified in the Urban Capacity Study should not be taken to suggest that it cannot be developed, unless development would conflict with the Local Plan's proposals.

Morley Drive/Langton Road, Bishops Waltham. Although this site has never been identified as an important recreation or amenity area (Proposals RT.1 and RT.2), its value for these purposes has been reassessed in the light of the objections to its identification as a potential urban capacity site. The Open Space Project Officer has been involved in this reassessment and it is concluded that the site does have some recreation/amenity value and has potential for this to be improved. In view of the shortfall of children's play provision in Bishops Waltham, especially the Pondside area, and the growth in demand likely to result from developing urban capacity sites, it is concluded that open spaces of this type should not be identified in the Urban Capacity Study. The Housing Monitoring Report therefore does not include this site and the site's contribution has been discounted.

Lockup Garages at Cunningham Avenue and Pondside, Bishops Waltham. These objections relate to three sites, at Cunningham Avenue (site 15), Langton Road (site 38) and Winchester Road (site 11). These have been reassessed in the light of the objections received. It is apparent that the garages involved are in multiple private ownership, not the single ownership originally thought. As such they do not meet the criteria for ‘good’ opportunities and should be excluded from the Urban Capacity Study update. However, the majority of site 11 is not a garage court and the site has now been acquired and is being developed for housing. The Housing Monitoring Report therefore includes a revised capacity estimate for this site, based on the net housing gain of the scheme now under construction.

Green's Close, Bishops Waltham. Although this site has never been identified as an important recreation or amenity area (Proposals RT.1 and RT.2), its value for these purposes has been reassessed in the light of the objections to its identification as a potential urban capacity

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

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

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

parking it would be too intensive and out of character.

Change sought – *remove the sites (numbers 11, 15, and 38) from the Urban Capacity Study and adjust the capacity figure in Table 1 accordingly.*

Bishop Waltham Society (212/16), M Eustace (993/1) .

Land at Green's Close, Bishops Waltham should be removed from the Urban Capacity Study and retained and enhanced as amenity space. The area should be used to meet open space requirements in the area and shortfalls would be exacerbated if it were developed. The site should be reserved for warden assisted/nursing home, the Youth Hall, Physiotherapy Clinic or replacement for The Institute. ***Change sought*** – *remove the site (number 36) from the Urban Capacity Study and adjust the capacity figures in Table 1 accordingly.*

Bishops Waltham Society (212/17), Mr & Mrs Vine (1326/1), M Regan (1327/1), P Paget (1330/1).

The loss of land located at Penford's Paddock, identified within the Urban Capacity Study, could only result in parking on the road with unacceptable interference to traffic flow. The site provides a turning head and contains mature trees. It should be used to meet open space requirements in the area and shortfalls would be exacerbated if it were developed. ***Change sought*** – *remove the site (number 54) from the Urban Capacity Study and adjust the capacity figures in Table 1 accordingly.*

R W Collins (172/1 – Not Duly Made), Colten Developments Ltd. (1146/1), T Venters (1331/1), J Ereaut (1334/1), D Farley (1336/1), P Tribbick (1341/1), D Vine (1342/1), B Mort & S Love (1343/1), Miss Schröder (1344/1), G R E Butcher (1345/1), B Espiner (1346/1), O J Thorlow (1347/1), P A Soper (1348/1), K Nossiter (1349/1), E Crispin (1350/1), Mr & Mrs Granger (1052/2), M Thomas (1007/1), Mrs Oram (1031/1), D Spence (1136/1), R Ford (1138/1), J Tennent Taylor (1333/1), B P Taylor (1335/1), S R

site. The Open Space Project Officer has been involved in this reassessment and it is concluded that the site does not have significant recreation/amenity value and has limited potential for this to be improved. As the site is clearly within the built-up area of Bishops Waltham the principle of housing development is acceptable (indeed planning permission has since been granted on the site). It is concluded that the site should be retained in the Housing Monitoring Report.

Penford's Paddock, Bishops Waltham. This is an area of amenity space between existing housing and Shore Lane. Although the site is reasonably large and does not have significant recreational value (or potential), it is raised ground and contains several mature trees. It is, therefore, accepted that the site could be difficult to develop, especially for the number of units estimated, and that its physical characteristics and relationship to existing houses means that it is too constrained to be classed as a 'good' opportunity. The Housing Monitoring Report therefore does not include this site and the site's contribution has been discounted.

Dyson Drive/Francis Gardens, Winchester. This site is identified as an important amenity open space by Proposal EN.2 of the current Winchester District Local Plan (1998). Work carried out by Chesterton suggested that joint development of this site and others nearby could result overall in a gain of dwellings and improved open space/amenity and the site was therefore identified in the Urban Capacity Study. It is, however, accepted that each site needs to be considered on its merits and that, on this basis, the Dyson Drive/Francis gardens site is an important amenity open space in the locality. It is, therefore, proposed that the site should be removed from the Housing Monitoring Report and that it should continue to be identified as an important open space (now Proposals RT.1 and RT.2). This would not necessarily preclude a wider-ranging scheme of housing and open space provision in the area, if this proved feasible. The Housing Monitoring Report, therefore, does not include this site and the site's contribution has been discounted.

Meadow House, West Meon. This site (and the adjoining site number 745) form the very large front gardens of two properties fronting High Street, West Meon. They are subject to the provisions of Proposal EN.1 of the current Local Plan (1998) and site 745 is within the Conservation Area. There are trees subject to a tree preservation order at the front of site 744, but these are large sites that have some scope for development without impinging on the constraints that exist. Although an appeal for 4 houses was dismissed in 1998, this was largely on the basis of the 'suburban' nature of the development proposed, rather than the principle of development. It is, therefore, concluded that these sites should be retained in the Housing Monitoring Report.

Sleepers Hill. Some respondents have objected generally to the principle of higher density development and/or affordable housing at Sleepers Hill on the basis that the character of the area would be undermined through increased traffic, losses of trees, drainage problems, etc. The area clearly has scope for achieving some urban capacity in terms of the spaces around buildings and the generally low

Winchester District Local Plan Review Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

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

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

Nye (1337/1), R Nye (1338/1), J Raggett (1339/1), A Walsh (1340/1)

Object to the failure to continue the protection and current use of public open space on the land on the corner of Dyson Drive/Francis Gardens, and the Urban Capacity Study proposal of the development of up to 20 houses on this land.

Change sought – maintain the current Local Plan's policies of RT.1 and RT.2 to protect the visual and amenity value of this land by maintaining its current use as public open space.

B Penn (1383/1)

Object to Meadow House being identified for up to four houses. Such development would be seriously destructive of the character of this part of the village. A Planning Inspector turned down a planning application for four houses on this site, submitted by a developer in 1997.

Change sought – delete the site (number 744) from the Urban Capacity Study and Table 1.

I E J Ferguson (990/1), S Osbourne (1429/1).

The urban capacity sites in Sleepers Hill, Winchester are not achievable if the Local Plan's Design and Development Principles are to be upheld. Sleepers Hill is steep and unsuitable for pedestrians, it is unsuitable for people with limited mobility, tree cover is one of the main features and should be protected, sites are likely to be steeper than 1:10 which is the maximum gradient allowed, there is no mains drainage and care/nursing homes would be lost.

Change sought – reduce the density of new housing incorporated into the Local Plan for "Urban Capacity Purposes" as far as Sleepers Hill is concerned.

P Jones (887/4), I Jones (888/6).

Any high-density development will lead to the destruction of some trees. High density development with affordable housing will reduce Winchester's attractiveness to those who bring prosperity to the City. Future development would disintegrate the roads around Sleepers Hill and septic

density of existing development. Indeed, infilling has continued in the area over many years. The importance of tree cover, slopes, drainage, etc continues to be recognised in the Local Plan and may justify some sites, or parts of sites, being excluded from development. However, it is not accepted that a blanket presumption against further development would be appropriate or defensible. It is not, therefore, proposed that any sites be removed from the Housing Monitoring Report in response to this objection.

Heath Road, Soberton Heath. This site is to the rear of existing houses fronting Heath Road, which are included within the settlement's development frontages. The principle of in-depth development would not, therefore, be acceptable within the terms of Proposal H.3, although if the existing dwellings fronting Heath Road were redeveloped there may be some scope to increase the capacity of the site. However, given the variety of ownerships this would involve, and questions as to the likelihood of it happening, this cannot be classed as a 'good' opportunity and should not be included in the Housing Monitoring Report.

Highdown, Cliff Way, Compton. Site number 117 is within the defined settlement boundary of Compton Down and includes land to the rear of a large property in Cliff Way, but not the area around the existing house. It is true that the Local Plan's policies would provide for the existing house to be to be redeveloped or converted, in principle, for residential development and given the respondent's interest in its inclusion it seems likely that it will be brought forward for development. It is, therefore, considered that this property should be included in the Housing Monitoring Report and, taking account of its size, an estimated capacity of 6 dwellings is proposed.

Change Proposed –paragraph 6.11:

Update Table 1 (see Issue 6.5 above).

Incorporate conclusions above into Housing Monitoring Report.

Winchester District Local Plan Review
Analysis of Representations on the Deposit Plan

CHAPTER 6: HOUSING

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

tanks on a steep hill will lead to groundwater contamination.

Change sought – *reinstate former EN.1 policy for Sleepers Hill, Winchester.*

J Webb (1372/1, 1372/2)

A plot on Heath Road (rear of Treetops-Homeleigh) is suitable for a new dwelling but is not included in the 'good opportunity' category in the Urban Capacity Study.

Change sought - *identify land on Heath Road, Soberton Heath, as a 'good opportunity'.*

A Butler (482/1)

Part of a plot at Highdown, Cliff Way has been identified in the Urban Capacity Study as being suitable for 2 dwellings (site no. 117). The remainder of the plot is equally suitable for residential development at a density of higher than 30-50 dwellings/ha.

Change sought – *The whole of the curtilage of Highdown, Cliff Way, Compton Down should be identified in the Urban Capacity Study as being suitable for development.*
