



**WINCHESTER DISTRICT LOCAL PLAN PART 2:  
DEVELOPMENT MANAGEMENT & ALLOCATIONS  
EXAMINATION**

**RESPONSES TO INSPECTOR'S QUESTIONS**

**MATTERS 7/8**

**REPRESENTATION: 50311**

**LAND AT HILLPOUND, SWANMORE**

**FOR DAVID WILSON HOMES**

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## **1.0 INSPECTOR'S QUESTIONS**

### **i) Are the policies and proposals for growth and change in this area appropriate and justified, including in relation to the NPPF/PPG, and in terms of environmental, economic and social impacts?**

1.1 This response addresses the objection to Policy SW1 as currently written, in that the Policy does not optimise the potential of the site to accommodate development. The Policy is also not deliverable in requiring the developer to retain, improve and manage the two Sites of Importance for Nature Conservation (SINCs) within the housing allocation.

1.2 It is considered that the proposition that Swanmore should grow and change between 2011 and 2031 is appropriate and justified. However, the specific proposals for growth outlined in Policy SW1 of the Winchester District Local Plan Part 2 Submission Plan 2016 for this area are not justified or consistent with national policy.

1.3 The south-eastern end of the housing allocation identified in the Development Management and Site Allocations Plan as SW1, is under option to David Wilson Homes. The response to the Publication (Pre-Submission) Winchester District Local Plan Part 2: Development Management and Site Allocations made in December 2015 set out the position of the Company to the paragraphs, policy and Inset Map listed in the response to the questions requested as part of the Regulation 19 consultation.

1.4 The Company supported the principle of the housing allocation but not the proposal that only about 140 dwellings should be developed within the allocation.

1.5 Full planning permission was granted by Winchester City Council on 10<sup>th</sup> March 2016 for the erection of 91 dwellings with associated parking, access, landscaping and surface water drainage on land to the south-eastern end of the housing allocation (see Appendix 1: Copy of Planning Permission and 2: Copy of approved site layout plan). A s.106 unilateral undertaking has also been signed securing the following

- (a) 36 affordable dwellings at the site;
- (b) Payment of a financial contribution towards the provision of affordable housing;
- (c) Payment of a financial contribution towards the provision of educational facilities; and
- (d) Establishment of a Management Company to oversee the maintenance of the open space areas of the site and attenuation pond areas for landscaping and drainage regimes

1.6 Whilst planning permission has been obtained for 91 dwellings on part of the housing allocation extending to 4.75 hectares (see Appendix 1 and 2), David Wilson Homes are currently negotiating with landowners and wish to secure the remainder of the land within the housing allocation in due course. That being the case, there is no objection to the open space requirements set out within paragraph 4.6.15 or within Policy SW1; however, it will be for the Council's Landscape Architect to determine the type of open space which should be provided within the housing allocation, based on specific requirements at the time a planning application is submitted.

1.7 As part of application 15/01693/FUL for 91 dwellings, the Company addressed matters relating to flood risk, surface water and foul drainage. The reference to these issues in paragraph 4.6.16 and Policy SW1 is noted and it is assumed that when the remainder of the housing allocation is developed, these issues will be fully considered.

1.8 Policy SW1 requires safe vehicle, pedestrian and cycle access points to the west (New Road) and east (Hillpound). The approved scheme included provision of a vehicular and pedestrian access from Hill Pound and the masterplan submitted as part of that application identified an access serving the remainder of the housing allocation from New Road.

1.9 It is considered that the emerging Plan is 'unsound' because the housing allocation only relates to about 140 dwellings; therefore, Policy SW1 is not justified and is not consistent with national policy. The

Council has already accepted the submission of a masterplan from the Company as part of application 15/01693/FUL establishing principles for the disposition of housing, open space, access points and linkages for the whole allocated area (see Appendix 3: Overall Masterplan).

- 1.10 The site area for the remainder of the housing allocation extends to 4.43 hectares gross excluding the two Sites for Importance for Nature Conservation (SINCs). Assuming a net area of 2.52 hectares (allowing for public open space and avoidance of the floodplain), the land remaining could be developed for approximately 90 dwellings at 20.3 dwellings per hectare (dph) gross or 35.7 dwellings per hectare (dph) net in addition to the 91 dwellings which the Council has already granted planning permission for. The land included within the SW1 housing allocation could therefore accommodate at least 181 dwellings in total, with 109 private houses units and 72 affordable dwellings equating to 40% of the total.
- 1.11 The Policy as currently drafted is evidently unjustified and not consistent with national policy, as the emerging Policy SW1 seeks to develop the whole allocation for only about 140 dwellings, with the remaining 49 dwellings envisaged under the Policy being developed at an inefficient density of 11 dwellings per hectare gross (4.43 hectares) or 19.4 dwellings per hectare net (2.52 hectares).
- 1.12 The proposed allocation at **The Lakes** extends to 11.6 hectares in total or 9.2 hectares when the two SINCs have been excluded. Developing the 9.2-hectare allocation for 140 dwellings would result in a housing density of 15.2 dwellings per hectare (dph) gross. This development density would be very low compared to those densities proposed for allocations in the following settlements listed in Table 1 below: Colden Common (CC1 and CC2), New Alresford (NA2 and NA3), Waltham Chase (WC1, WC2, WC3 and WC4) and Wickham (WK2 and WK3). No justification has been given by the Council as to why it is acceptable, or reasonable, that the SW1 housing allocation should be developed at such a low density.

Table 1 – Selection of housing allocations and their proposed housing densities

| Policy Number | Site area in hectares | No of Dwellings | Gross Density |
|---------------|-----------------------|-----------------|---------------|
| CC1           | 5.6                   | 165             | 29.5          |
| CC2           | 2.7                   | 53              | 19.6          |
| NA2           | 2.1                   | 75              | 35.7          |
| NA3           | 10*                   | 325             | 32.5          |
| SW1           | 9.2                   | 140             | 15.2          |
| WC1           | 2.8                   | 60              | 21.4          |
| WC2           | 0.8                   | 30              | 37.5          |
| WC3           | 3.2                   | 60              | 18.8          |
| WC4           | 3.9                   | 85              | 21.8          |
| WK2           | 4.2*                  | 125             | 29.8          |
| WK3           | 2.9*                  | 80              | 27.6          |

\*Site area allocated for housing part of a larger overall area

- 1.13 It would appear that the emerging Local Plan includes an arbitrary housing figure of 140 dwellings for this allocation as this number, and five dwellings to be delivered under SW2, more-or-less equals Swanmore's remaining net housing requirement in the Submission Plan as of 31<sup>st</sup> March 2015. The fact that the resulting development density for this housing allocation would be very low does not appear to have considered by the Council.
- 1.14 The Plan does not include the most appropriate strategy for the housing allocation within Swanmore, especially as paragraph 58 of the NPPF encourages planning policies and decisions to aim to ensure that developments optimise the potential of the site to accommodate development. The Council appear to have ignored this requirement and therefore Policy SW1 does not seek to optimise the development potential of the site.
- 1.15 In addition, Policy DS1 of the Council's Local Plan Part 1: Joint Core Strategy expects development proposals to make efficient use of land within existing settlements. The Council's own emerging Policy, SW1, sets out the overall quantum of housing to be delivered within the housing allocation, which is contrary to their own development strategy and principles (Policy DS1 of the Joint Core Strategy) and the policies of the NPPF.

- 1.16 By increasing the quantum of development within Policy SW1 from about 140 dwellings to about 180 dwellings, this would enable the optimisation of development and an efficient use of the land to be made, in accordance with Policy DS1 from the Winchester District Local Plan Part 1: Joint Core Strategy and paragraph 58 of the NPPF. The current requirements are not justified and not consistent with national policy.
- 1.17 The District housing requirement established in the Local Plan Part 1 of 12,500 dwellings being required between 2011 and 2031 equates to an average rate of housing delivery of 625 over the plan period. Given that net housing completions since April 2011 have not come close to meeting the average annual requirement, and assuming that not all other housing allocations within the South Hampshire Urban Area and Market Towns and Rural Areas will deliver the expected rate of housing, it is considered that Policy SW1 should allow for sufficient flexibility to deliver even more housing, thus meaning that the housing figure attributed to Swanmore within the Local Plan Part 1 could be exceeded. After all, the housing requirements for the settlements within the Market Towns and Rural Areas were not expressed as maxima, and the housing allocation could clearly accommodate at least 40 additional dwellings beyond the 49 dwellings remaining to be developed as part of the allocation, envisaged by the current wording of Policy SW1.
- 1.18 David Wilson Homes acknowledges the detailed site assessment work undertaken by the City Council, their detailed Sustainability Appraisal) and the subsequent work of the Parish Council to establish the community's preferences for new development sites in Swanmore. On this basis, the Company is satisfied that the Council has sufficiently addressed the environmental, economic and social impacts of development currently planned for Swanmore, but not in relation to any alternative proposal of a higher housing figure for this allocation.
- ii) Are they clear and deliverable, including in respect of the associated infrastructure requirements?**
- 1.19 David Wilson Homes do agree that the policies and proposals in this area are clear but they do not agree that they are deliverable.

- 1.20 As currently written, Policy SW1 requires the developer to retain, improve and manage the two Sites of Importance for Nature Conservation (SINCs) within the housing allocation. Whilst David Wilson Homes provided a masterplan as part of application 15/010693/FUL setting out development principles for the whole area, they object to any requirement to retain, improve and manage the two Sites of Importance for Nature Conservation (SINCs).
- 1.21 The proposed safeguarding of the two SINCs is a worthy one, not without merit, but their protection and management should remain the responsibility of the landowners of these sites. The developer should not be required to retain, improve or manage either of the two SINCs within the housing allocation given that they have no agreement to even access these sites, let alone devise a strategy for their retention, improvement or management. That said, if it is deemed necessary and appropriate a financial contribution could be sought going forwards towards their management.
- 1.22 In granting planning permission for 91 dwellings within this housing allocation, Council Members queried of Mr Opacic, who attended the committee meeting to answer Members' questions, whether the application included any proposals for the SINCs and he advised them that they were not required. This does beg the question whether this aspect of the Policy is actually required, when the whole allocation could be developed without including either of the two SINCs.
- 1.23 The developer is seeking the removal from Policy SW1 of any reference to the need to retain, improve and manage two Sites of Importance for Nature Conservation (SINCs), as these are in different ownerships to the land within the housing allocation likely to be developed for housing. The Council do not know if the owners of the two SINCs are willing for their land to be retained, improved and managed into the future and so the Council should not require that this element of the Policy be met as part of any further development proposals that may come forward relating to the housing allocation. The current requirements are not justified and removing them will make the plan 'sound'.
- 1.24 Aside from the Policy requirements relating to the two existing SINCs, the policy's listed infrastructure requirements are clearly understood and David Wilson Homes agreed to all of these requirements as part of

planning application 15/01693/FUL. Contributions will also be made towards other forms of infrastructure through payments towards the Council's Community Infrastructure Levy, 15% of which will be given to Swanmore Parish Council to spend in the locality.

## **2.0 CONCLUSION**

- 2.1 David Wilson Homes do not consider that the policies and proposals for Swanmore contained with Policy SW1 are appropriate or justified, as the Policy does not optimise the potential for development and is thus contrary to paragraph 58 of the NPPF and Policy DS1 from the Winchester District Local Plan Part 1: Joint Core Strategy.
- 2.2 Whilst the requirements of Policy SW1 are clear, they cannot be considered to be deliverable. The developer should not be required to retain, improve or manage either of the two SINC's within the housing allocation given that they have no agreement to even access these sites, let alone devise a strategy for their retention, improvement or management.
- 2.3 The Plan as currently written is 'unsound'.