



## Winchester Town – Policies WIN 1-4 Statement to Matter 14

### 1. What particular part of the document is unsound?

- 1.1 The policies and proposals for growth and change at Winchester Town do not meet the tests of soundness as set out at Paragraph 182 NPPF. The Local Plan Part 2 (LPP2) policy provisions for Winchester Town, Policies WIN1 – WIN11, have been prepared on the basis of the development strategy set out in Policy WT1 of the Local Plan Part 1 (LPP1). For housing this includes a requirement for LPP2 to identify and allocate sites to provide 4,000 new dwellings, 2,000 of which have already been allocated by LPP1 at Barton Farm.
- 1.2 However, there have been a number of important developments since the LPP1 was adopted in March 2013 that the LPP2 must respond to in order to be found sound otherwise there is a significant risk that it will be immediately out of date on adoption. These include changes to the Planning Practice Guidance (PPG) that now require market signals, including improving affordability, to be considered when determining the OAN for housing. Recent appeal decisions and High Court judgments have determined that any likely uplift to the OAN needs to be taken into account during plan making. The LPP2 will also need to respond to the ongoing delivery issues at key sites within the district, which are contributing to the persistent under delivery of new homes and shortfall against the five-year housing land supply.
- 1.3 In light of these developments, and in order to be considered sound at examination, the LPP2 will need to be revised to incorporate additional greenfield sites, which are smaller than the current strategic extensions, around Winchester Town as allocations to provide housing. This will enable the LPP2 to provide, “*sufficient flexibility to adapt to rapid change*” (Paragraph 14 NPPF), ensuring that enough land is available over the plan period to meet housing needs.

### 2. Which soundness test(s) does it fail?

- 2.1 The policies and proposals for growth and change at Winchester Town fail to meet the OAN for housing and have therefore **not been positively prepared**. They do not represent the most appropriate strategy and are therefore **not justified** because they have omitted land to the west of Salters Lane (SHLAA 2541) as an allocation to provide approximately 240 dwellings. Further, they are **not consistent with national policy** as the presumption in favour of sustainable development, which would apply to the proposals at Salters Lane, is not being promoted in the plan making process to meet identified development needs as required by paragraph 14 NPPF.



### **3. Why does it fail?**

- 3.1 The LPP2 policies for Winchester Town, Policies WIN1 – WIN11, have been prepared on the basis of a requirement for 4,000 new dwellings from 2011 to 2031 at Policy WT1 in the LLP1. It is anticipated that this requirement will be largely met through outstanding permissions (3,156 dwellings), including 2,000 dwellings at Barton Farm, with net completions (01 April 2011 to 31 March 2015), SHLAA sites within the settlement boundary, planning frameworks and windfalls contributing 349, 310, 132 and 910 dwellings respectively. As this will result in a total supply of 4,857 dwellings Winchester City Council is not proposing any additional greenfield allocations in the LPP2.
- 3.2 The LPP2 does not demonstrate that there will be a deliverable supply of new housing land in appropriate locations to meet a likely increase in objectively assessed housing need (OAN) in accordance with the requirements of the Paragraph 47 NPPF. It also fails to provide contingencies and alternatives, including allocating additional sites to provide new housing, in the event that development does not come forward as expected at strategic sites. Further details are available in the Statement made on behalf of Bargate Homes (Representor Number: 52010) to Matter 2 on Meeting Development Needs.
- 3.3 Additional sites should be identified at Winchester Town given that it is the main settlement in the district's settlement hierarchy and benefits from excellent sustainability through its public transport provision and concentration of services, workplaces, shops, etc. Opportunities for additional allocations at Winchester Town should be explored before looking at other parts of the district as the PUSH area is already accommodating a significant number of new homes, 6,000 in total, and the LPP2 has had to identify a number of allocations at the Market Towns and Rural Areas.

### **4. How could the document be made sound?**

- 4.1 The LPP2 can be made sound by allocating land to the west of Salters Lane (SHLAA 2541) to provide approximately 240 dwellings to help meet local needs for market and affordable housing.
- 4.2 The Sustainability Appraisal / Strategic Environmental Assessment (September 2015) that informed the LLP2 revealed that the merits of the Salters Lane site and other omission sites were not considered, "*Given the scale of 'over-provision' that is expected from sites identified as part of the Winchester housing supply*" (Page 22, Appendix 9). It added that the, "*development of any of the omission sites promoted would not be a 'reasonable alternative' to the strategy proposed in LPP2*" as it would result in an even greater level of provision that was deemed to be in conflict with the LPP1 housing requirement for Winchester at Policy WT1.



- 4.3 The development proposals at Salters Lane are highly sustainable and would therefore benefit from the presumption in favour of sustainable development in the NPPF. They would clearly constitute a “reasonable alternative” and must be assessed in the Sustainability Appraisal on its individual merits to inform the most appropriate strategy for accommodating growth at Winchester Town. The current strategy for allocating sites at Winchester Town **cannot be justified** without the results of such an assessment having been considered. The failure to consider the merits of the Salters Lane site would also not meet the Paragraph 157 NPPF requirement to plan positively for development.

### **Salters Lane Sustainability Credentials**

- 4.4 The Salters Lane site is approximately 13 hectares with frontages to Stockbridge Road (B3049) to the north, Salters Lane to the east and Dean Lane to the south. The site lies adjacent to Winchester’s north western boundary and is therefore compliant with Policy DS1 of LPP1 which specifically allows for development beyond but adjoining the settlement boundary.
- 4.5 The site benefits from good public transport accessibility with bus services to the centre of Winchester within a short walking distance (0-400m) on Stockbridge Road. The site also enjoys close proximity to a number of shops and local services at the Stoney Lane local centre as well as nearby primary schools that are all within easy walking distance.
- 4.6 The concept plan, provided at Appendix A, which was supported by a series of technical reports that were submitted to the consultation on the Publication (Pre-Submission) LPP2 on behalf of Bargate Homes Ltd, shows the potential of the site to accommodate approximately 240 dwellings at an average density of 30 dwellings per hectare (dph) together with 4.8 hectares of public open space. There is flexibility in the site for the amount of residential development, densities and open space to be adjusted, to help integrate the new development with the existing settlement, through further master planning in collaboration with the local community and stakeholders moving forwards. The generous provision of public open space can help address the existing shortfall in provision at the St Barnabas and Sparsholt Wards, both of which cover the Salters Lane site, as well as meeting the needs for future residents at the site.
- 4.7 The proposals provide for a central spine road from an access on Stockbridge Road designed with wide verges to accommodate ‘avenue’ tree planting. This would create an attractive view into the site from Stockbridge Road. Building frontages would be set back from the entrance to help emphasize the landscaping and open space in this area. The spine road would lead to a centrally located village green, which would be characterised by hard and soft landscaping with large scale tree planting. A number of streets would radiate out from the village green to the housing areas that would be arranged in a variety of loose perimeter blocks with clear separation between private and public realms and active frontages looking onto semi private and public



spaces. The various perimeter blocks would be designed at differing densities commensurate with the sensitivity of their location i.e. 20 to 30 dph around the southern and western edges and 30 to 40 dph within the main body of the site.

### **Deliverable**

- 4.8 The Salters Lane site is considered **deliverable** within the next five years as it suitable, available and achievable.

### **Suitable**

- 4.9 The site offers a suitable location for residential development, as there are no known policy constraints. The site is not covered by any national designations and is not within the area covered by the South Downs National Park. The site is also not subject to any historic designations and is not within a conservation area or other registered heritage designation. It will not affect the setting of any listed buildings or scheduled monument. It is not identified for safeguarding in the Hampshire Minerals and Waste Plan.
- 4.10 The technical work that was commissioned by Bargate Homes Ltd found that there no physical constraints that would prevent the site coming forward for the provision of 240 residential units.

### **Access**

- 4.11 The site benefits from good links to the surrounding road network and would have direct access on to Stockbridge Road that leads to the city centre and Winchester rail station. The Transport Assessment (see previous submission) identifies a series of possible measures that could be provided to ensure safety at the access on to Stockbridge Road. Whilst junction analysis and supporting traffic/speed surveys have not been undertaken it is currently considered that the impact from the development traffic will be low at the proposed site access and minimal at other local junctions. However, there are opportunities to make further improvements to the surrounding highway network for the benefit of the wider community.

### **Utilities**

- 4.12 There are no known utilities capacity or connection constraints to the proposals at Salters Lane. It is anticipated that the overhead power lines that run along the north west of the site would be re-laid underground as part of the development proposals.

### **Contamination**

- 4.13 The desk top assessment (see previous submission) identified potential sources of contamination from ground gas originating from the natural strata



on site; pesticides in near surface soils; and PCBs locally adjacent to the electrical substation along the northern boundary of the site. The risk of impact to identified receptors from the potential sources across the site is considered to be very low to low. As such, a limited intrusive investigation is recommended for the site and that a discovery strategy is in place during any works that are carried out.

### ***Flood risk and drainage***

- 4.14 Contrary to the findings in the Sustainability Appraisal the Flood Risk Assessment (see previous submission) found that the site is not within a groundwater protection zone and is classed as being within Flood Zone 1. There are no constraints to the development of the site in terms of flood risk. At this initial stage of investigation it is concluded that appropriate foul and surface water drainage can be provided to serve the development, incorporating sustainable drainage systems.

### ***Landscape character***

- 4.15 The proposals set logical and robust landscape boundaries securing a defensible and long-term edge for Winchester town, whilst ensuring a positive relationship to the countryside setting, including the Open Arable, Scarp and Clay Farmland landscape that characterises this area to the north west of Winchester. The proposals seek to conserve and enhance the landscape setting of the site and the wider study area, and to help integrate the proposed residential development into the wider landscape of the Winchester area. This will be achieved through the enhancement and management of existing boundary vegetation, as well as through the establishment of new, appropriate boundary treatments and woodland belts using locally sourced native species. New woodland planting would take place around the western boundary and any weakened hedgerow structure in the vicinity of the development area, to the north and south will be strengthened.
- 4.16 The Landscape and Visual Impact Assessment (LVIA) (see previous submission) highlights that the Sustainability Appraisal has not undertaken a critical appraisal of the landscape and visual factors affecting the site and its surroundings. The LVIA demonstrates that development can be undertaken and mitigated without having significant adverse impacts on the character and appearance of the countryside or the setting of Winchester.

### ***Biodiversity***

- 4.17 The provision of new woodland planting and strengthening on hedgerows will provide an opportunity to enhance biodiversity through providing potential wildlife corridors that could connect with SINC's in the local area.



### ***Heritage conservation***

- 4.18 Considering the evidence and the relevant criteria, the site has an overall low significance. Consequently archaeological potential would not represent a significant constraint to any future development. Further site assessment in the form of trial trenching is recommended to assess the potential for buried remains within the site; the results of this will inform a final mitigation strategy.

### ***Available***

- 4.19 The Salters Lane site is under single land ownership and is available.

### ***Achievable***

- 4.20 It is not anticipated that the preparatory works at the site ahead of the development proposals coming forward would be extensive. However, the costs for relaying the overhead power lines underground will need to be established.

## **5. What is the precise change that is sought?**

- 5.1 **Paragraphs 3.3.1 – 3.3.6.** The Winchester New Housing Requirement table needs to be updated to accommodate an increase in the supply of housing to meet the OAN and to take account of delivery issues at the strategic sites. The conclusion drawn in Paragraph 3.3.6 will need to be revisited to acknowledge the need to bring forward additional greenfield allocations to meet the housing land supply requirement.
- 5.2 Policy WIN1 needs to be amended to provide for development within **and adjoining** the defined settlement boundary of Winchester.
- 5.3 A specific allocation for land at Salters Lane for residential development needs to be included in the LPP2 Winchester Town Chapter.
- 5.4 Policy DM1 needs to be amended to provide for development within **and adjoining** the defined settlement boundary of Winchester. Further, the settlement boundary at Winchester Town should be reviewed to include for an allocation of land at Salters Lane for residential development.
- 5.5 Policies Map 24 needs to be amended to include the Salters Lane site within an amended settlement boundary limit for Winchester Town.