

15 September 2015

savills

To all members of the  
Cabinet (Local Plan) Committee

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Dear Councillor Read

I would be grateful if these representations could be taken into account when the revised Local Plan Part 2 is considered, particularly in respect of Waltham Chase.

In revised Chapter 1, it is stated that it is not the function of LP2 to increase housing numbers. Whilst that is the case, there is nothing to stop the Council redistributing its LP1 housing figures (subject to due process) taking into account the continued pressures building up to meet this country's pressing housing shortage, as well as constraints on delivery that inevitably occur on some sites. Wiltshire adopted its Core Strategy in January this year and has recently redistributed its housing numbers around settlements, whilst at the same time preparing a Site Allocations Document. Winchester City Council needs to be pragmatic and keep its housing numbers under review and introduce some flexibility to allow potential redistribution in LP2 to meet continued needs and recognise constraints causing allocated sites not to come through quickly enough.

In paragraph 48, it also says there is no need to review strategic gaps; this is done when sites are allocated. This brings into question allocations in Waltham Chase, where the two sites comprising WC4, to the south of my client's site, are allocated, yet are both in the strategic gap and our client's site is not allocated, despite us submitting an illustrative plan pulling development away from the eastern part of the site to respect the gap.

In revised Appendix F on Waltham Chase, we obviously still take issue. We have already made a formal complaint to the Chief Executive about the flawed site selection process.

In paragraph 11 on site selection, the Council attempts to justify site selections based on decisions taken by the Parish Council to focus on smaller to medium sized sites, yet, as the Chief Executive acknowledges, my client's site at that time was part of a much bigger site which was discounted. It was not considered on its own merits, as a much smaller site. As a result of choices then made, my client was excluded from ongoing discussions regarding capacity etc. The Parish Council's own consultation on preferred options can hardly be called a consultation, and it is not surprising there was only a small response. As a result, my client's site is now considered as an 'Omissions Site' having been omitted on flawed reasoning and consultation.

Detailed comments on our client's site are included in paragraphs 29 to 36. I comment on each of these below:

29. This summarises my client's position as objecting to the other allocations and preferring its site as alternative. This position comes about because the way questions are framed. My client's position is that it believes its site should be allocated, as it meets selection criteria. It considers its site better than others. If the Council are sticking to their original choices, as well as the housing numbers given to Waltham Chase, yes it does see its site as a better alternative to others that the Council favours. These points have been made before. This paragraph acknowledges that my client's site was not properly considered as a standalone site and it will be considered at the next stage of the plan against the preferred sites. This is not considered a fair

way to proceed. Preferred sites have had due consideration, whilst my client's has not. My client's site therefore goes into the next stage of the Plan as an Omission site on flawed logic. My client's site should go into the next stage of the Plan on an equal footing to the other sites, so it gets fair consideration rather than starting as an Omission site based on poor consideration. This issue was at the heart of our complaint to the Chief Executive last December, when there was time to correct matters.

30. This highlights that the site is in the gap between Waltham Chase and Swanmore. What it fails to say is that my client's have revised their illustrative plan, accompanying the proposal reducing numbers from 100 to 60. This has facilitated a large area of green space on the eastern side of the site, helping maintain the gap. Whilst the gap is mentioned here, it hasn't stopped the allocation of two sites comprising WC4 which are also in the gap.

31. Open spaces and community uses are highlighted here, however there is a failure to link these to the maintenance of the gap that the Council so desires. Lack of footpath to Lower Chase Road is also highlighted as something that counts against my client's site. Whilst our illustrative plan did not show this level of detail, such a footpath could easily be incorporated into the proposals, as my client's site abuts the highway. A footpath within the site could either be provided adjacent to the road or within the northern part of the site itself. What our illustrative site does show, and has not been highlighted, is potential pedestrian access to the land to the south, which the Council is favouring. This would overcome the Council's concern about safe pedestrian access to the village.

32. Comparison is made to favoured site WC3, saying that this site is less visually sensitive. What it does not say is that WC3 is currently served off sub-standard roads, which create their own problems for vehicles and pedestrians.

33. Comparison is made to the two Forest Road sites (WC4). Whilst the report acknowledges that both of these favoured sites are visually sensitive and are within the Gap, it then goes on to conclude that 'by splitting them up this would have a lesser impact on the Gap than the larger site at Van Diemens Field, which would have a significantly greater impact on the gap due to the extent of development'. Again, there is flawed logic in this conclusion. Firstly, the Forest Road sites do not need splitting up; there is already a busy road separating them. The land to the south of the road is significantly further east than the land to the north, and therefore has potentially greater impact on the Gap. Development of the land south of the road extends the settlement much further to the east, whereas development of land to the north, together with the land we have shown in our illustrative plan, maintains the size of the settlement to the east of the main north south route through the village.

34. This states that in transport terms the Forest Road sites only enjoy marginally better access to local services and facilities. It fails to mention that if pedestrian access was facilitated from the northern Forest road site to our client's site, walking distances from the land to the south of Forest road would be comparable to my client's land.

35. This paragraph gives a choice of my client's land and the two Forest Road sites. It doesn't have to be this straight choice. It could be the development of my client's land together with the land to the north of Forest Road, which has planning logic to it.

36. It is noted that this states our clients land fares no better than other allocated sites. This implies it is at least on a par. It then goes on to say however that it performs worse in terms of visual impact and access to local services and facilities. Those points have been refuted above.

#### Conclusion.

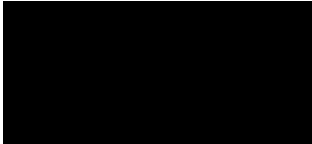
As the Council acknowledges that my client's site has not been properly assessed in a like fashion to the favoured sites, it should go into the next stage of the plan as one of a number of shortlisted sites for final choices following this next stage of the plan.



If the Council are sticking to numbers allocated for Waltham Chase, and are only going to allocate sufficient sites to meet that number, my client's site should go forward in place of one of the other sites, either land to the south of Forest Road or Sandy Lane.

As it has been acknowledged, my client's site has not had fair and proper consideration and it is hoped members will allow my client's site to go forward to the next stage of the plan unconstrained by past mistakes in its assessment.

Yours sincerely



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**Director**  
**Planning**

cc Nancy Graham  
Senior Democratic Services Officer

