

**Draft Winchester District Local Plan Part 2**  
**Recommended Responses to Issues Raised**

**Chapters 1 and 2 Introduction and Background and Meeting Development Needs**

1. A summary of all the representations on the draft Local Plan relating directly to chapters 1 and 2 Introduction and Development Needs was presented to the Cabinet (Local Plan) Committee on 30 March 2014 – report CAB2676(LP) Appendix 6. That report contains a full summary of comments by Local Plan policy/paragraph/map. Copies of all representations are available on the Council's web site: <http://documents.winchester.gov.uk/LPP2/Default.aspx>
2. Report CAB2676(LP) records the various issues raised in relation to different parts of the Plan. It responds to some of these but leaves most for further consideration. This report presents all the key issues raised in relation to the first two chapters of the draft Local Plan and recommends responses on all of these, including any already subject to recommendations in CAB2676(LP).
3. The proposed amendments to Chapters 1 and 2 are set out in Appendix 1 of this report and include amendments to the diagram at end of paragraph 1.2 to refer to Minerals and Waste Plan which forms part of the Development Plan; amendments to reflect the adopted status of the Denmead Neighbourhood Plan; updates to the consultation requirements, and dates of the next steps.
4. Appendix 2 lists the responses to comments on the Sustainability Appraisal/Strategic Environmental Assessment.

**Comments on the whole Local Plan**

5. A number of comments were received which raised general issues regarding the Local Plan as a whole. The sustainability of the Plan was questioned, together with concerns that the level of housing to be provided wasn't required and the infrastructure wasn't in place to support the level of housing, and that developers must be held to account to ensure the requirements set out in policies are fulfilled.
6. The adopted strategy as set out in policy DS1 of Local Plan Part 1 outlines the amount and distribution of the required amount of housing across the District up to 2031. The strategy was developed following consideration of the relative sustainability and suitability of settlements for future development. The Local Plan Inspector considered the soundness of this strategy and LPP1 has now been statutorily adopted following consultation and examination. Development of the sites identified will require improvements to infrastructure where this is considered necessary and deliverable, as specified in the specific site allocations and delivered as part of the resulting planning applications. The implementation

of policies and ensuring requirements are met will be a matter for planning conditions issued with planning consent and their discharge. The requirements for the provision of affordable housing are set out in LPP1 policy CP3 although this may be varied where specific viability issues are identified and justified.

## **Chapter 1 - Introduction and Background**

7. South Downs National Park Authority (SDNPA) welcomed the clarity of references in the Plan to the SDNPA and preparation of its plan, but requested that reference is made to under Section 62 of the Environment Act 1995 that relevant bodies (which includes WCC) must have regard to the statutory purposes of the National Park. The Environment Act 1995 requires that in exercising or performing any functions in relation to, or so as to affect, land in a National Park, any relevant authority shall have regard to the purposes, to seek to foster the economic and social well-being of local communities within the National Park, and, if it appears that there is a conflict between those purposes, shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park. Therefore the support is welcomed and an amendment is proposed to paragraph 1.4 to include reference to the requirement to have regard to the statutory purposes of the national park.
8. Following the publication of the draft Local Plan in October 2014, a number of updates are necessary to bring the information up-to-date. These amendments include references to the Denmead Neighbourhood Plan which has now been 'made' and is now part of the statutory development plan, and progress on LPP2.

### **Evidence Base**

9. A number of comments received suggested that the Local Plan was based on an out-of-date evidence base, or that the information has not been interpreted correctly. Some comments suggested that some evidence was missing as the Plan fails to make any reference to the 2013 Travellers Accommodation Assessment for Hampshire.
10. The need to review the housing numbers and employment figures set in Local Plan Part 1 based on an updated needs and housing delivery assessment was also raised by a number of respondents, who suggest that LPP1 underestimates the requirement. In addition, one respondent commented on development viability and proposed that flexibility was also needed to maximise site delivery to take advantage of improving circumstances. The respondent suggested that if housing delivery targets are not met, mechanisms such as "Local Development Orders, designation of self-build sites, normally refusing extension of time on extant planning permissions, focusing CIL funds as much as possible where it will hasten nearby developments and site assembly." should be used to...increase the going rate as much as possible above the Local Plan annualised requirement...".
11. In response to this, it is not considered necessary to set out examples of possible changing economic, social and environmental circumstances in the Plan. The

Plan is required to meet needs but there is no requirement in the NPPF to take steps to exceed housing targets. The Council is required to demonstrate an adequate 5-year land supply (with 'buffer') and is doing so at present, and expects to maintain this.

12. The Local Plan Part 1 is up to date, NPPF-compliant and recently adopted. It is not, therefore, accepted that it is out of date or that an early review is needed. Nevertheless, in a recent judgement (Gladman Development Ltd v Wokingham Borough Council, dated 11 July 2014) the judge concluded that an Inspector assessing the soundness of a plan dealing with the allocation of sites for housing is not required to consider whether an objective (re)assessment of housing need would disclose a need for additional housing. He considered that the legal framework and the NPPF do not require that a site allocations plan (like LPP2) addresses the question of additional provision, even if the Core Strategy needs updating and may need to make additional provision for development in the future.
13. Experience of housing delivery in the short part of the Plan period that has elapsed indicates that delivery is broadly in line with the expected trajectory (see the Annual Monitoring report 2014). At the present time a 5 year supply can be demonstrated and the purpose of bringing forward the allocations set out in the LPP2 is to ensure that this remains the case. It is not, therefore, accepted that the housing requirements of LPP1 are out of date or need an early review.
14. Developers seeking to promote alternative sites may disagree with the outcome of evidence studies and put forward their own evidence to support their sites. The NPPF expects plans to be based on 'proportionate' evidence; that is adequate, up-to-date and relevant. Where challenges have been made to proposed sites and alternatives put forward these and the evidence supporting them have been considered in the relevant settlement chapters.
15. On the point of missing evidence, the studies mentioned in paragraph 1.6 are not an exhaustive list but the full list is set out in Appendix C of the Plan. The need for permanent pitches for Travellers, as identified in the Travellers Accommodation Assessment for Hampshire (2013), remains within Winchester District. This will be dealt with when the ongoing site assessment study is completed, the outcome of which will be taken forward through a separate development plan document (DPD).
16. Given the above reasoning, no additional amendments to LPP2 in light of these comments is proposed.

### **Sustainability Appraisal**

17. A number of comments were received on the Sustainability Appraisal (SA). These are further addressed in the Draft SA of the Pre-Submission Draft Local Plan Part 2 (2015) and are picked up in the reports for the relevant settlements. The issues raised question the overall approach to sustainability and consider it should be positive to be in-line with the NPPF requirements. The iterative

approach of the SA is also questioned as the respondent suggests that the results of the SA were skewed towards a predetermined outcome.

18. Enfusion are the Council's SA consultants for LPP2 and were commissioned to carry out the SA of LPP2 at the start of the Plan production process in 2013. Initial SA work with regard to sites and constraints was undertaken and published (dated September 2013) later that year, well before any decisions were taken on the sites to be included in the draft Plan. Most of the impacts assessed in the SA are positive. Potential negative impacts have been identified for issues such as nature conservation, climate change and waste as a result of the impact of development, but the SA sets out how these impacts will be mitigated. The SA concludes 'Overall, the policies and proposed site allocations provide a strong positive framework to guide future sustainable development in the District.' Therefore no changes in response to this comment are proposed.

### **Duty to Co-operate**

19. English Heritage considers it could have had greater involvement earlier in the Plan making process but EH has now taken full advantage of the opportunity to comment on the draft heritage policies, to support policies or suggest changes to them where needed. The issues raised have been addressed in the reports on the relevant chapters.
20. Another respondent considered that cross-boundary working has been not been embedded in the formulation of the Plan from the outset. For Colden Common, decisions on the site selection were made before any response was received from the South Downs National Park Authority. Given that "great weight" needs to be attached to the protection of the National Park the respondent suggests that WCC has failed in its Duty to Co-operate.
21. Decisions on site selection were made over a considerable period of time taking into account a large range of factors as opinions and evidence emerged. In the case of Colden Common the Parish Council considered the outcome of consultations and evidence in October 2013 then again in March 2014 when it amended its recommendation to WCC. WCC officers had consulted and had full knowledge of the response from the SDNPA when considering Colden Common Parish Council's recommendation in the light of all the evidence when preparing the draft Plan. No subsequent changes are proposed.

### **Chapter 2 – Meeting Development Needs Development Needs and Distribution**

22. The Hampshire Chamber of Commerce were concerned about lack of employment allocations outside of Winchester Town. They considered that there was no explanation in the Plan why employment provision is not made for growing populations in the market towns and larger villages within and adjoining the PUSH part of the district apart from a small allocation at Bishop's Waltham with some employment land is lost at Waltham Chase and Colden Common.

They also considered that the Plan does not reflect the Solent LEP strategy (March 2013) or the call in March 2014 by the Solent LEP for additional logistics land.

23. The target for employment provision is established in the Local Plan Part 1, which also makes strategic allocations including employment. Background studies leading to the draft allocations included a review of employment needs for the settlements where housing development is proposed in LPP1. The draft Local Plan makes employment allocations at Alresford and Bishops Waltham, as well as mixed use allocations. Within the South Hampshire Urban Area, Policy SHUA2 retains an employment allocation at Little Park Farm and some vacant land remains within the existing employment area at Whiteley. New policies are proposed to protect this for employment use (see South Hampshire Urban Areas response document). At West of Waterlooville about 23 hectares of employment land is allocated through policy SH2 and a further 20 hectares is allocated at Bushfield Camp, Winchester (policy WT3). There is no evidence of need for further employment land at this time.
24. A number of respondents queried the housing figures used for LPP2. They suggest that the Council has a clear shortfall in five year land supply, that the trajectory won't provide enough affordable housing, and that predicted delivery is unrealistic and relies too heavily on the Strategic Allocations. Further comments suggest that the housing figures don't take account of PUSH requirements and the improved local and national economy. A number of these respondents are promoting alternative sites for allocation.
25. As set out above, at the present time an ample 5 year supply (with 'buffer') can be demonstrated and the purpose of bringing forward the allocations set out in the LPP2 is to ensure that this remains the case. The issue of affordable housing and overall housing numbers has been settled through LPP1. Policy CP3 of LPP1 addresses affordable housing provision on market led housing sites and policy CP4 addresses affordable housing on exception sites to meet local needs as also set out earlier in the report. Furthermore, in response to comments suggesting that where need is demonstrated sites still have to be provided despite community objections or lack of support, the wording in paragraph 2.7 reflects LPP1 Policy CP4, which states "Subject to the needs of the local community the affordable home should ...." and "In these circumstances the applicant should demonstrate that the proposal has community support ..."
26. With regards to alleged over-reliance on Strategic Allocations, two of the three strategic allocations are now under development and a planning application has been submitted for the third (N Whiteley). The delivery of housing and other development is monitored and reported on at least annually. The published Annual Monitoring Report includes information on the delivery of housing together with revised housing trajectories for the period up to 2031 and an assessment of the Council's position on five year land supply. Assessment of this information currently indicates an ample housing land supply, but could trigger a review of the Plan in the future, if necessary. There is no need to consider a review of the LPP1 at the present time. LPP2 includes in paragraph 1.8 references to the implications of the review of the South Hampshire Spatial Strategy and if any

significant changes arise they can be addressed through a future review of the LPP1/LPP2.

27. Comments were also made on the need to allocate additional sites outside the current Winchester Town settlement boundary to be in line with LPP1 requirements and address housing need. In addition, the lack of policy to ensure that employment, retail and services are expanded in step and sustainably close to existing and/or new housing was also raised. LPP1 Policy WT1 does allow for the possibility of development adjoining as well as within the built-up area of Winchester as that Plan allocated such land, at Barton Farm. However, studies have identified capacity on deliverable and developable sites within the built-up area, together with a reasonable and justified allowance for windfalls, as allowed by the NPPF, sufficient to meet the needs set out in Policy WT1. Therefore it has not been necessary to consider sites proposed by developers outside the built-up area. In addition, there is no evidence of need for further employment land at this time and no changes are proposed.
28. One respondent questioned the lack of details on the development proposed at Bushfield Camp. Bushfield Camp has already been allocated in LPP1 in policy WT3. LPP2 does not need to provide further detail on this site since policy WT3, together with relevant development management policies will provide the appropriate policy context when a planning application is received.
29. Further comments raised concerns about the impact of windfall sites not contributing to infrastructure. However, considering the sufficiency, or otherwise, of infrastructure and services has been an integral part of developing the LPP2 and its allocations. Allocations have been made where there is capacity, or where capacity can be increased and development is made conditional upon additional service and infrastructure requirements.

### **Site Selection: Assessment Methodology**

30. A few respondents suggested that the methodology used for the site selection process was not objective due to the local community involvement and that the methodology of this assessment may have inherently dismissed otherwise suitable and sustainable sites from coming forward. Further comments received suggest that the process was not sufficient to safely conclude in paragraph 2.15 that there is no need for further allocations in Winchester Town and suggest that there was a failure to consider the reasonable alternatives, particularly the sites outside Winchester Town where further allocations were not considered necessary. Alternative sites were also promoted by the respondents.
31. With regard to plan-making the NPPF states: "Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made." It is therefore entirely appropriate that the methodology takes account of the outcome of engagement

with the local community, whose consideration was informed by evidence. However, the process also took into account the outcome of technical evidence on various topics, and was subject to Sustainability Appraisal /Strategic Environmental Assessment and no changes are therefore proposed in response.

32. In response to the issues raised regarding sites around Winchester Town, LPP1 Policy WT1 does allow for the possibility of development adjoining as well as within the built-up area of Winchester as that Plan allocated such land, at Barton Farm. However, studies have identified capacity on deliverable and developable sites within the built-up area, together with a modest allowance for windfalls as allowed by the NPPF, sufficient to meet the needs set out in Policy WT1. Therefore it has not been necessary to consider sites proposed by developers outside the built-up area.
33. English Heritage made a number of comments on this section. They question why non-designated heritage assets are not included in stage 1, whereas sites of local biological and geological importance are. They suggest the term 'Other registered heritage designation' is confusing – better to specifically identify Registered Historic Parks and Gardens and Registered Battlefields the potential impact on which should also have been considered. They also comment that the purpose of stage 3 is unclear; unsuitable sites should have been eliminated at stage 2 and a stage 4 introduced to clearly set out the sites to go forward through the consultation process and query whether there has been any weighting of the key criteria.
34. Taking the issues in the order above, stage 1 looked at designated sites rather than non-designated ones. Sites of Importance for Nature Conservation are the local biological designations referred to. These are designated nature conservation areas, which are identified on the Local Plan Policies Map, albeit local ones. Non-designated heritage assets were taken into account at Stage 2. 'Other registered heritage designation' does include Registered Historic Parks and Gardens and Registered Battlefields the potential impact on which has been considered therefore an amendment is proposed to paragraph 2.26 to replace 'Other registered heritage designation' with 'Registered Historic Parks and Gardens and Registered Battlefields'. Stage 3 included public consultation which gave the opportunity to review short listed sites against the key criteria to focus the consultation comments. Key criteria have not been weighted as such although national designations would be given greater priority over local designations.

## **Settlement Boundaries**

35. One respondent commented that the maps shown at the exhibition differed from the consultation document which has serious implications by omitting key facilities from the settlement boundary in Wickham . Another commented that the settlement boundary review should have included Winchester Town as proposed in LPP1.

36. Maps for Wickham at the exhibition differed as those for earlier stages showed existing boundaries and the later stage showed the proposed settlement boundary. A number of representations make comments on the proposed site allocations/settlement boundaries or suggest sites for development, either as an alternative to those allocated in the draft plan or in addition and these are addressed in the report on the relevant settlement chapter.
37. One objection was made to the use of settlement boundaries which could effectively preclude otherwise sustainable development from coming forward; the respondent also promotes a site on the edge of Denmead. However, Settlement boundaries are an established, effective and widely used device. They are used to identify on the Policies Map the application of policies which refer to the use of land “within existing settlements”. The Inspector when examining LPP1 said they should be reviewed, not abandoned. LPP2 has taken on board the housing and other development requirements of LPP1 and where these cannot be met within existing boundaries these have been extended to include what have been assessed as the most appropriate sites to meet those requirements following consideration of alternative proposals. The Denmead Neighbourhood Plan has, in accordance with Policy MTRA2 of LPP1, identified sites to deliver the required amount of housing development. The Neighbourhood Plan allocates 4 sites for housing purposes and there is no requirement for LPP2 to allocate further sites. Therefore, no change is proposed in response to these comments.
38. Again, respondents raised proposals for allocating sites outside the Winchester Town settlement boundary which they suggest meet the site assessment criteria set out in the settlement boundary review, but as set out earlier in this report, LPP1 Policy WT1 does allow for the possibility of development adjoining as well as within the built-up area of Winchester as that Plan allocated such land, at Barton Farm. However, studies have identified capacity on deliverable and developable sites within the built-up area, together with a modest allowance for windfalls as allowed by the NPPF, sufficient to meet the needs set out in Policy WT1. Therefore it has not been necessary to consider sites proposed by developers outside the built-up area. Some sites within the settlement may have constraints but that does not mean they are not deliverable and developable.

## **Policy Omissions**

39. The Environment Agency suggested that given the localised flooding that occurred in the District in 2013/14, a localised flood risk policy may be prudent, although there is a strong policy in LPP1. A localised policy would be helpful for windfall developments. However, it is considered that the policy in LPP1 (CP17) is sufficient. Where specific issues require a localised policy this has been addressed, as is the case with Wickham and policy WK1, and in site allocations for example in Swanmore and policy SW2 The Lakes in LPP2. The nature of windfalls is that their location cannot be anticipated and policy CP17 can be used in such cases and no change is proposed.
40. Natural England comments that the Plan does not appear to have a strategic approach towards the Natural Environment. This comment is about the local

planning authority working collaboratively with other partners, including Local Nature Partnerships, to develop and deliver a strategic approach to protecting and improving the natural environment based on local priorities and evidence. Also, considering the opportunities that individual development proposals may provide to enhance biodiversity and contribute to wildlife and habitat connectivity in the wider area. At a strategic level in the South Hampshire part of the Plan area the City Council is involved in the Partnership for Urban South Hampshire Green Infrastructure Strategy, which is currently being reviewed. Within specific allocations in the LPP2 opportunities are taken to protect and enhance adjoining natural environment sites, such as Stratton's Copse at Colden Common, therefore no change is proposed.

41. The Hampshire & Isle of Wight Wildlife Trust recognises the very good policy on Flooding, Flood Risk and the Water Environment. (Policy CP17) in LPP1, but would like to see this reflected more in LPP2. However, it is considered that the two parts of the Local Plan LPP1 and LPP2 should be read and used together and it should not be necessary to repeat policy or text from LPP1 in LPP2. The utility companies and the Environment Agency have been consulted on the site allocations to ensure that sites are only allocated where there is already adequate infrastructure to provide and treat water or it can be provided and therefore no amendments are proposed.

## **Policies Map**

42. The South Downs National Park Authority notes that small segments of some settlement boundaries lie within the NP and that this can be resolved by the two authorities working together, to show the complete boundaries in their respective plans. This is distinguished on the policies map and no change is needed.

## **Background Documents / Evidence Studies**

43. One respondent questioned the use of consultants to produce background studies for LPP2. However It is sometimes necessary to commission consultants to undertake studies due to timing, their specialist knowledge or need for an independent view. Such consultants do not always have local knowledge however this is applied by council officers when reviewing the consultant's reports.
44. With regards to the Settlement Boundary Review, one respondent commented that it only relates to boundaries where there are housing proposals in Local Plan Part 2. They maintain that this is not justified and all boundaries should be reviewed so that any changes since the previous Local Plan was adopted can be accommodated and to ensure that land that could reasonably contribute towards any shortfalls in the housing trajectory for the District. They also promote an alternative site.

45. To ensure that the most appropriate sites are allocated through LPP2, further work was undertaken on the various points raised in the representations, including Sustainability Appraisal, and it is not proposed to review the strategy set out in LPP1 which sets a housing target for Winchester Town, the Market Towns and larger settlements, which does not include the area around Otterbourne and Southdown, although other sites could come forward if there is clear community support as set out in LPP1 policy MTRA3. No change is therefore proposed.
46. Another respondent commented on the Housing Site Assessment Methodology and suggests that it supports the suitability of Glen Park (Site 2389) in Colden Common for allocation. These comments are addressed in the report on Colden Common.
47. It was suggested by one respondent that Strategic Gaps should have all been reviewed in accordance with para. 132 of the Inspector's Report into the Joint Core Strategy. Objections were raised to the boundaries of the Whiteley – Fareham Gap, the Gap that affects land at Lower Chase Road and the Otterbourne - Southdown gap.
48. The principle of Gaps between named settlements is established in Local Plan Part 1 (policy CP18). In defining the detailed boundaries of Gaps, the approach adopted consistently across the District is to define all the land between the respective built-up areas. This approach is continued in the draft LPP2, with boundaries reviewed where site allocations are necessary in an area. The Gaps have, therefore, been reviewed to the extent necessary to accommodate development requirements, but should be contiguous with the built-up areas they separate and no amendments are necessary.

## **Consultation**

49. A number of issues were raised regarding the way the consultation had been carried out. A few commented that the method used was very difficult as paragraph/policy references were requested on the form and these weren't easy to cross-reference to and some better explanation of terminology and guidance should have been available. In addition, a few respondents felt that information wasn't readily available, particularly impeding those who were not computer literate. One respondent suggested using professional pollsters to conduct and interpret the questionnaire and that undue weight was given to public opinion.
50. Officers tried to guide respondents at the exhibitions to the policy numbers in the Plan to assist their responses. Where respondents have not included policy or paragraph numbers officers have been able to determine which part(s) of the plan they are supporting or objecting to. The exhibitions aimed to explain, with the help of officers and additional documentation, what the plan contained for those who can't access a computer and hand written responses have been accepted and included. Paper copies of the Plan and comment forms were sent to all Parish Councils and were available at local libraries. The publicity arrangements for each exhibition or meeting (14 events) were agreed with the local Parish/Town

Council and typically included posters, public notices, banners, flier distribution to all homes and/or notices in Parish Magazines or other publications. In Winchester a flier was sent via the local free newspaper to all households. In response to the final points, consultation is not an opinion poll and dependent on the number of people making comments but is seeking comments on the planning issues. However, learning points from the consultation process will be used in efforts to make consultation more accessible and understandable in future.

## Appendices

51. One respondent pointed out a missing reference to “Blue Corridors” in Appendix A. Reference is made to ‘Blue Infrastructure’ in Chapter 6 and ‘Blue Corridors’ in the glossary, but these terms have not been defined. The term ‘Blue Corridors’ is used and defined in Local Plan Part 1 and the proposed amendment to the definition of the NPPF comes direct from the DCLG website. Therefore the recommended amendment is to add a definition in Glossary A to read:- *Blue Infrastructure (Blue Corridors) - Describes the seas, rivers, their tributaries and floodplains and includes canals and ponds which can form linked ‘Blue Corridors’ for the movement of wildlife through the District.* It is also recommended that the Appendix A Glossary definition of NPPF is amended to read:-*The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these are expected to be applied.*~~priorities for planning in England.~~ It replaced the previous raft of planning policy guidance notes and statements (PPGs and PPSs).
52. English Heritage requested that Conservation Area Character Appraisals and Management Plans could be added to Appendix C as could the Hampshire Integrated Character Assessment. The Conservation Area Character Appraisals are currently being updated by the Historic Environment Team and only statements for Hambledon and Sparsholt are currently available on-line. As the list is not meant to be a comprehensive list of the evidence base, it is recommended that these statements are not added to the list. The Hampshire Integrated Character Assessment is available on line and therefore it is recommended that a reference is added to Appendix C under Key Background Documents / Evidence Studies:-[Hampshire Integrated Character Assessment](#)
53. They also comment that the description of “Evidential value” in Appendix D is incorrect: “evidential value” is defined in English Heritage’s Conservation Principles as “value deriving from the potential of a place to yield evidence about past human activity”. They suggest “association with a notable family, person, event or movement” falls within “historical value”. However, as these are criteria for local listing it is concluded that they should be locally determined.

## Habitat Regulations Assessment (HRA)

54. Natural England supported the conclusion of the HRA Screening report, but comment that revised targets have been published for the River Basin

Management Plan for the area covering the River Itchen SAC. which should be taken into account in the HRA. The RSPB also raised concerns that the New Forest SPA has been screened out the HRA. This has been passed on to the consultants undertaking the HRA work for LPP2, and an update to the HRA is available with the Sustainability Appraisal (SA) document which reflects changes to the chapters being taken to the initial Local Plan Committee. Further SA/HRA work will be carried out and any necessary changes will be included in the chapters to be reported to the following Local Plan Committee.

### **Sustainability Appraisal / Strategic Environmental Assessment**

55. Natural England and a number of other respondents raised issues regarding the SA/SEA. The questions and issues raised include whether the SA/SEA should have aggregated sites; whether it is based on correct evidence; that it highlights the unsuitability of some proposed allocations; and that it didn't consider reasonable alternatives. These are being addressed in the Draft SA of the Pre-Submission Draft Local Plan Part 2 (2015) which will be further amended to reflect changes to be reported to the following Local Plan Committee. Appendix II of the Draft SA of the Pre-Submission Draft Local Plan Part 2 sets out the response to these comments and is attached as Appendix 2 to this report.

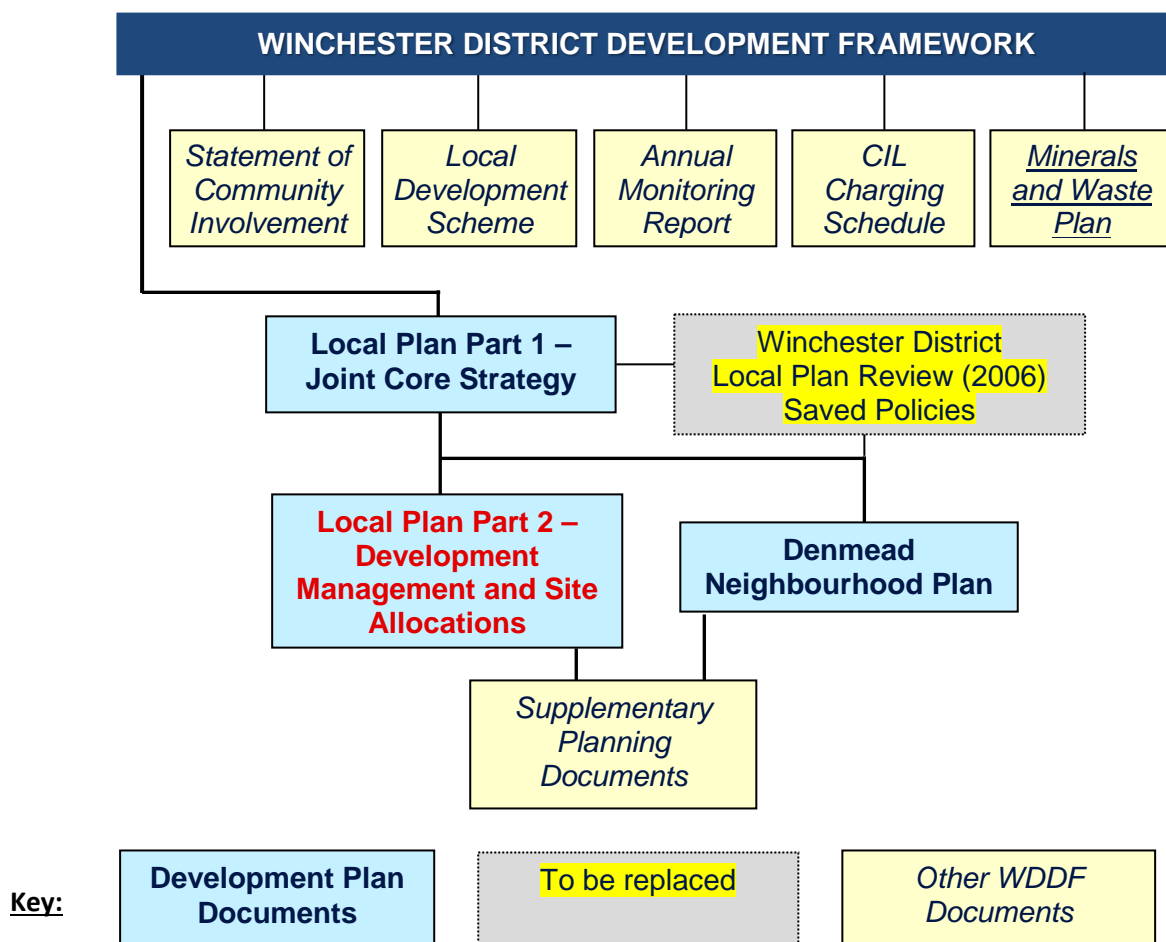
**Appendix 1 Proposed Changes to Local Plan Part 2**

# 1

## **INTRODUCTION & BACKGROUND**

# 1 Introduction & Background

- 1.1 The Winchester District Local Plan Part 2 (Development Management and Site Allocations) (LPP2) will form part of the District Development Framework (see below), which will guide future planning decisions in Winchester District. It follows on from the Local Plan Part 1 - Joint Core Strategy (LPP1) that was adopted by Winchester City Council and the South Downs National Park Authority in March 2013.
- 1.2 The Local Plan Part 1 is one of the principal documents within the Development Framework and sets out the overall vision, objectives, spatial strategy and strategic policies, as well as how the joint strategy will be implemented and monitored. The Hampshire Minerals and Waste Plan, adopted in October 2013, also forms part of the Development Plan and relevant policies in that document will be taken into account in determining future development.



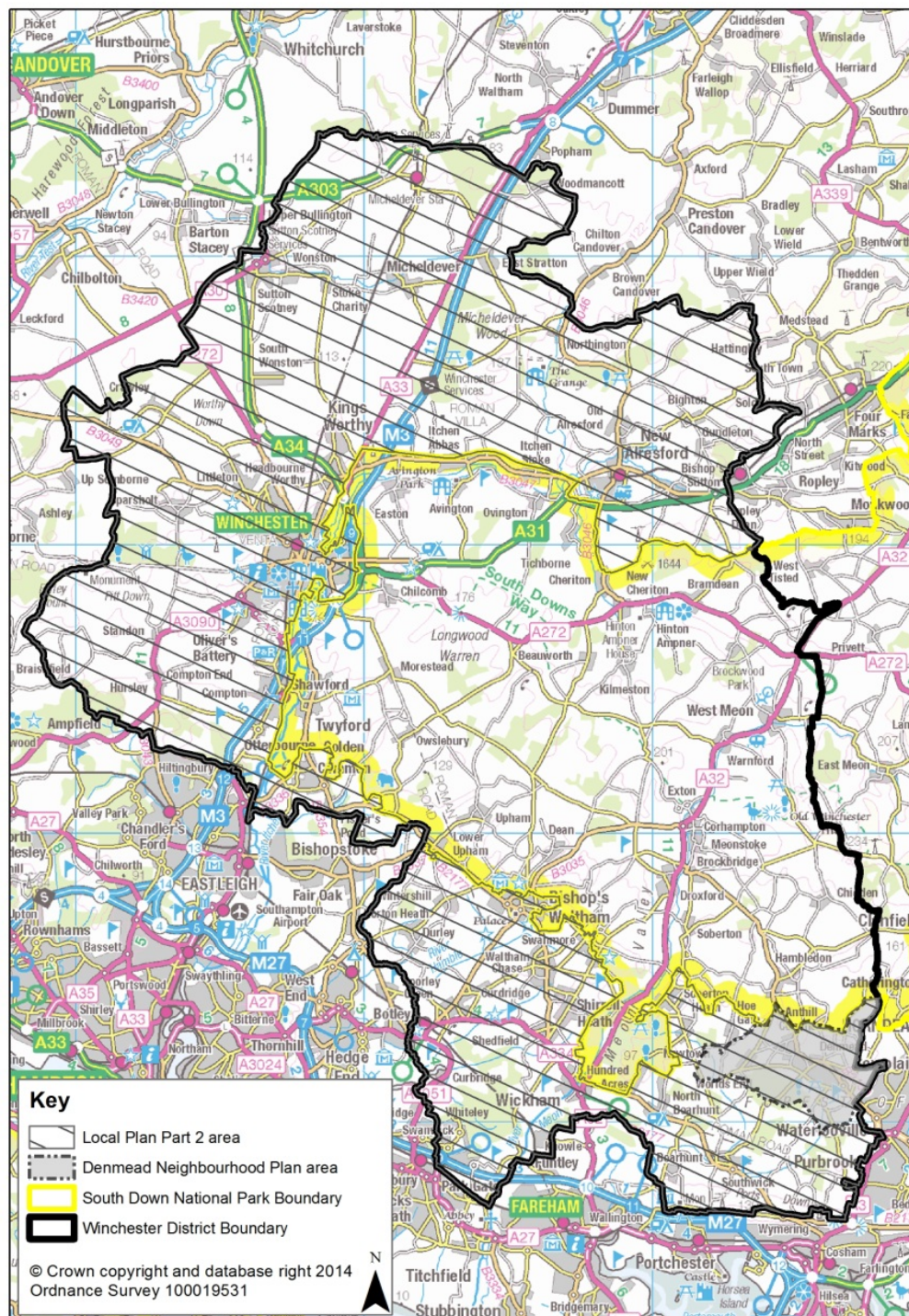
Delete 2006 Local Plan and add Gypsy and Traveller Site Allocations DPD to diagram

- 1.3 A main aim of LPP2 is to allocate land to help deliver the development strategy for new housing, economic growth and diversification set out in Policy

DS1 of LPP1 for the period to 2031. It ~~will also replaced or supersede~~ the remaining 'saved' policies from the Winchester District Local Plan Review 2006, and includes a number of new and revised development management policies in addition to the core policies in LPP1. Some of the development requirements have already been met through development that has taken place, or is committed through planning permissions granted since 2011.

- 1.4 LPP2 also identifies the development sites necessary to meet the remainder of LPP1's requirements throughout the District, except for that part of the District that lies within the South Downs National Park, and for which the National Park Authority is preparing its own local plan. A Neighbourhood Plan ~~is being prepared by~~ has been adopted ~~Denmead Parish Council~~ for the part of Denmead Parish outside the National Park (see Section 4.9). This ~~will~~ makes development allocations in Denmead, but the development management policies of LPP2 (see Chapter 6) ~~will~~ also apply to the designated Neighbourhood Plan area. Various Supplementary Planning Documents/Guidance have been adopted and others will be produced, including Village Design Statements.
- 1.5 The map below shows the areas covered by LPP2, the Denmead Neighbourhood Plan and the National Park.

## Areas Covered By Local Plan Part 2



~~When Local Plan Part 2 is adopted it will form~~ part of the Development Plan, along with Local Plan Part 1 and the Hampshire Minerals and Waste Plan.

**All the policies within the Development Plan will be taken into account in determining planning applications, along with other material considerations.**

~~Therefore, the policies in this Plan do not list or cross-refer to other policies that may be relevant, but these nevertheless continue to apply. Until the adoption of Local Plan Part 2 the 'saved' policies of the Winchester District Local Plan Review 2006 continue to form part of the Development Plan.~~

## Evidence Base

- 1.6 The development management policies and site allocations in LPP2 are supported by an up-to-date, relevant and proportionate evidence base in accordance with the requirements of the National Planning Policy Framework (NPPF) and the Town and Country Planning (Local Planning) (England) Regulations 2012. The key studies in the evidence base include the Strategic Housing Land Availability Assessment (SHLAA), Sustainability Appraisals (SA), the Habitats Regulations Assessment (HRA) and the Strategic Flood Risk Assessment (SFRA). All the studies and reports that comprise the Plan's evidence base are available on the Council's web site.
- 1.7 The development requirements set by Local Plan Part 1, particularly for housing, remain relevant and this Plan does not seek to review them or to update the Strategic Housing Market Assessment, Housing Technical Paper or other evidence that ~~led~~ to their development. The housing needs and targets for the District (to 2031) were subject to detailed scrutiny through the process of developing and adopting LPP1. A subsequent legal challenge to the Plan resulted in further scrutiny ~~more recently~~, with the High Court's judgement endorsing the assessment of the housing requirement contained in LPP1 and finding it consistent with the requirements of legislation and Government policy.
- 1.8 Since LPP1 was adopted the Partnership for Urban South Hampshire (PUSH) has produced an updated Strategic Housing Market Assessment (SHMA). This provides evidence of housing needs which will inform a revision of the PUSH Spatial Strategy, alongside other evidence. If any significant changes arise from the review of the South Hampshire Spatial Strategy they are likely to apply beyond 2031 and can be addressed through the normal process of reviewing and rolling forward the LPP1 and this Plan. The implications of the review of the South Hampshire Spatial Strategy will, however, be monitored and taken into account in deciding when to review the Local Plan.

- 1.9 An important consideration in the drafting of LPP2 is to ensure that policies are sufficiently flexible so that they can respond to changing economic, social and environmental circumstances. Viability and the cost of delivering development have therefore been considered in preparing the Plan, including in assessing the deliverability of site allocations. In addition, the policies in the LPP2 are supported by LPP1 Policy CP21, which allows account to be taken of the cumulative impact of developer contributions on viability, where evidence shows this is an issue.

### **Sustainability Appraisal & Habitat Regulations Assessment**

- 1.10 LPP2 and its preparation must meet the requirements of the Strategic Environmental Assessment (SEA) Directive. The ~~draft~~ policies and site allocations have been appraised on an iterative basis by independent consultants *Enfusion* against sustainability objectives. These iterations have identified to what extent ~~emerging the~~ policies achieve the relevant social, environmental and economic objectives and recommend how sustainability could be improved. The Sustainability Appraisal accompanies this document and its recommendations have been taken into account in the ~~drafting~~ development of the Plan. The Conservation of Habitats and Species Regulations 2010 also require assessment of the impact of plans and policies on protected sites of international nature conservation importance (Habitat Regulations Assessment – HRA). The consultants have also undertaken this assessment and changes have been incorporated as necessary to reflect the conclusions of the HRA.
- 1.11 One of the protected areas is the Solent coastline, as much of it is protected by environmental designations including three Special Protection Areas (SPAs). Recreational activity resulting from housing development in the vicinity of the Solent can impact upon its ecology and, in order to deal with the effects of new housing, Councils on or near to the Solent coastline have agreed to support a mitigation strategy known as the Interim Solent Recreation Mitigation Strategy. Under the Strategy, all additional residential development within 5.6km of the SPAs will be expected to contribute towards mitigating its recreational impact, usually through a financial contribution towards implementing the Strategy. This requirement will affect some of the areas covered by this Plan, particularly Whiteley, Wickham, Waltham Chase and part of Bishops Waltham, and is highlighted in the relevant sections of the Plan.

### **Community Engagement**

- 1.12 The Council is committed to involving the public in the decision-making process. In preparing this document, the Council has needed to balance its responsibility to involve the public in decision-making with its duty to plan positively for sustainable development. ~~Since early 2013,~~ From the start of Plan preparation the Council has worked with Parish Councils, local communities and other organisations to determine and accommodate the development needs of the area, particularly the larger settlements that have a

housing target to meet under Policies WT1 and MTRA2 of LPP1. Details of these processes are set out in a separate Consultation Statement and referenced in respective chapters for Winchester Town and the Market Towns and Rural Area.



### Duty to Co-operate

- 1.13 Cross-boundary working has been embedded in the formulation of the Plan from the outset. In that respect, the City Council has engaged positively a wide range of public bodies and neighbouring authorities in the preparation of this Plan, including the South Downs National Park Authority, Hampshire County Council, the Highways Agency, the Environment Agency, Natural England and neighbouring planning authorities in Hampshire. Account has also been taken of the strategies of the two Local Economic Partnerships (LEPs) covering the District – the Solent LEP and the Enterprise M3 LEP. A Duty to Co-operate Statement forms part of the evidence base to the Plan.
- 1.14 As noted in paragraph 1.67 above, the housing requirements for the District are set within LPP1 and this is robust and up to date. The allocations proposed in this Plan enable these to be met within the Plan area and it has not been necessary, therefore, for the Council to re-visit the overall development requirements or to seek the assistance of adjoining authorities to achieve them. Cooperation with neighbouring local planning authorities has been mainly focussed on addressing cross boundary issues, such as in relation to development in or immediately adjoining these authorities.

### Structure of the document

- 1.15 The content and structure of LPP2 continues the themes of LPP1 –

Local Plan Part 1		Local Plan Part 2
<b>Spatial Strategy</b>		<b>Site Allocations</b>
Winchester Town		Allocations & Policies
South Hants. Urban Areas		Review of <del>WDLPR</del> -policies for Whiteley
Market Towns & Rural Area		Allocations & Policies
<b>Core Policies</b>		<b>Development Management</b>
Active Communities		Housing; development location; open space; traveller sites
Prosperous Economy		Town centre development;

		rural development
High Quality Environment		Development principles; design criteria; environmental protection; landscape; heritage
Infrastructure, Implementation & Monitoring		Implementation & Monitoring

1.16 The remainder of this document deals with –

- **Meeting Development Needs** (Chapter 2)
- **Winchester Town** (Chapter 3)
- **Market Towns and Rural Area** (Chapter 4)
- **South Hampshire Urban Areas** (Chapter 5)
- **Development Management** (Chapter 6)
- **Implementation and Monitoring** (Chapter 7)

1.17 The Plan also includes a glossary (Appendix A) and 43 other appendices containing background and other information. ~~A draft~~The Policies Map, with Inset Maps for specific settlement areas, accompanies the Plan to show where the ~~draft~~ policies would apply after the adoption of LPP2. ~~Summary maps of the proposals for the main settlements are included within Chapters 4 (Market Towns and Rural Area) and 5 (South Hampshire Urban Areas).~~

## Public Consultation

1.18 This version of LPP2 is the **Draft Publication (Pre-Submission) Plan** prepared under Regulation 48-19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and sets out the Council's ~~preferred options for proposed~~ development management policies and site allocations. This is the ~~first~~second statutory stage of consultation that LPP2 will need to go through before it can be adopted by the Council (see 1.235 below). Representations on the Plan must be in writing, by email or letter, or by using the form available online <http://www.winchester.gov.uk/planning-policy/local-plan-part-2/lpp2-draft-plan-background-documents/> **update link** that can be submitted electronically or downloaded and posted.

By post to:  
Head of Strategic Planning  
Winchester City Council  
City Offices  
Colebrook Street  
Winchester  
SO23 9LJ

Email to:  
[LPP2@winchester.gov.uk](mailto:LPP2@winchester.gov.uk)

1.19 All consultation responses must be received no later than **12.00 midday on 521 December 2015.4** and should: Representations may be made on two main areas:- legal compliance or soundness (soundness is broken down further into three areas, explained in the guidance accompanying the consultation documents).<sup>1</sup>

1.20 As a broad rule of thumb:

- if you are making representations on how we prepared or consulted on the Local Plan Part 1 (Core Strategy) then the issue is likely to be one of legal compliance;
- If it is the actual content of the strategy you wish to make a representation on or object to, then this is likely to relate to soundness.

In your comments, you should specify which the policy, paragraph, map or site on which you are commenting is the subject of comments, and set out how you think the Plan should be changed, including suggested revised wording to policies, supporting text or map(s).

### Next Steps

1.21 Representations will be available for public inspection when they have been validated and entered into the Council's consultation database. All those who comment, and who are not already recorded, will be added to the consultation database to enable them to be kept informed of the progress of LPP2.

4.22 Once the consultation has closed we will send all the representations received within the consultation period, along with a copy of the Local Plan Part 2 and any proposed modifications, to the independent Planning Inspector appointed to examine the soundness of the Plan (this is called the 'Submission' stage). It will then be examined by the Inspector who will consider whether

~~1.23 A summary of the representations will be reported to the Council's Cabinet (Local Plan) Committee following the end of the public consultation period. A revised version of this document, the **Publication ('Pre-Submission') Draft**, will then be published for a further period of consultation on the 'soundness' of the Plan. The Publication Draft, along with all representations received, will then be submitted to an independent Inspector who will examine the 'soundness' of the Plan.~~

1.24 ~~The examination will consider whether the Plan meets the tests of 'soundness' set out in the NPPF (paragraph 182) which require that it must be –~~

- *Positively prepared;*
- *Justified;*
- *Effective; and*

<sup>1</sup> Requirement under Planning and Compulsory Purchase Act 2004.

- *Consistent with national policy.*

1.25 The timetable for the remainder of the LPP2 production process is –

Plan Stage	Date(s)
<del>Publication (Pre-Submission) Draft Plan</del>	<del>June 2015</del>
<del>Consultation on the Publication Plan (6 weeks)</del>	<del>June/July 2015</del>
Submission to Secretary of State for examination	<del>November 2015</del> <u>March 2016</u>
Examination hearings	<del>February/March</del> <u>June / July 2016</u>
Inspector's report	<del>June</del> <u>October 2016</u>
Adoption	<del>July</del> <u>November 2016</u>

# 2

## MEETING DEVELOPMENT NEEDS

## 2 Meeting Development Needs

### Development Needs and Distribution - Context

- 2.1 The spatial strategy of the Joint Core Strategy (LPP1) identifies the principal focus for new development across the District as the urban area of Winchester Town and the South Hampshire Urban Areas. Together these will account for the bulk of the District's objectively-assessed needs that, in total, amount to 12,500 new dwellings and about 20 hectares of new employment land to assist economic and community development over the Plan period 2011 – 2031. More locally-focussed development will take place in the Market Towns and Rural Area, reflecting the needs and requirements of those communities.
- 2.2 Policy DS1 of LPP1 seeks to make efficient use of land within existing settlements and prioritise previously developed land in accessible locations. It gives the three-way distribution of the total housing requirement as -
- Winchester Town 4,000 dwellings
  - South Hampshire Urban Areas 6,000 dwellings
  - Market Towns and Rural Area 2,500 dwellings
- 2.3 Since the adoption of LPP1, the Council has continued to monitor net housing completions in the District, and to update/review its [Strategic Housing Land Availability Assessment](#) (SHLAA) in terms of site availability and capacity. Details of the remaining housing requirement for the sub-areas, and the individual settlements within them, are set out in the respective sections of this document.

#### (i) Winchester Town

- 2.4 Policy WT1 of LPP1 sets out how the spatial planning vision for Winchester will be achieved, namely by means of –
- Some 2000 new homes through development and redevelopment of existing sites and premises within and adjoining the defined built-up area
  - About 2000 homes at Barton Farm
  - Economic development and diversification
  - The town centre as the preferred location for new retail, commercial, leisure, culture and tourism development
  - Education facilities, including a new primary school at Barton Farm
  - Additional open space and recreation provision
  - Retention of existing and provision of new green infrastructure
  - Sustainable transport provision
  - Employment opportunities at Bushfield Camp
  - Highest design quality in new development.

## **(ii) South Hampshire Urban Areas**

2.5 Policy SH1 of LPP1 seeks to deliver the vision for this spatial area through –

- A new community to the West of Waterlooville of about 3,000 new homes (with about 600 of these in Havant Borough)
- A new community to the North of Whiteley of about 3,500 new homes
- Peripheral green infrastructure associated with the North of Fareham Strategic Development Area ('Welborne')
- Commercial floorspace at Whiteley, Segensworth and West of Waterlooville (most already committed)
- Protection of important natural assets, particularly habitats of national and international importance and settlement gaps.

## **(iii) Market Towns and Rural Area**

2.6 This spatial area includes the 50 or so smaller settlements ranging from market towns, with a population of several thousand, to small hamlets of a few dwellings. The area of the South Downs National Park will be subject to a separate Local Plan so is excluded from LPP2 (see 1.4 above). LPP1 Policy MTRA1 'development strategy' focuses the provision of new homes to meet the local housing needs of the settlements. Development should be of an appropriate scale so as not to exceed the capacity of existing services, or be accompanied by required improvements to infrastructure provision.

2.7 LPP1 Policy MTRA2 ('Market Towns and Larger Villages') requires about 500 new homes in both Bishop's Waltham and New Alresford, and about 250 homes in each of the larger villages of Colden Common, Denmead, Kings Worthy, Swanmore, Waltham Chase and Wickham. Housing, employment, retail and services should be accommodated 'within existing settlement boundaries in the first instance. Sites outside settlement boundaries will only be permitted where, following an assessment of capacity within the built-up area, they are shown to be needed, or to meet a community need or realise local community aspirations identified through a Neighbourhood Plan or other process which demonstrates clear community support.'

2.8 All development sites should be appropriate in scale and design and conserve each settlement's identity, countryside setting, key historic characteristics and local features. Development should also reflect the need to protect areas that have been designated for their local, national, or international importance, such as settlement gaps and the South Downs National Park. Economic and commercial growth will also be supported to maintain and improve the shopping, service, tourism and employment roles of the settlements.

2.9 Housing and other development requirements at Denmead will be delivered through its Neighbourhood Plan (see section 4.9).

2.10 Policy MTRA3 relates to other settlements in the Market Towns and Rural Area. Development and redevelopment opportunities are supported within the

defined boundaries of the listed settlements, to meet local needs. LPP1 Policy CP4 allows for affordable housing to be developed on exception sites to meet identified local needs. No housing target is specified in the LPP1 for these settlements, so no allocations are being made through LPP2 in the MTRA3 settlements (see section 4.10).

### Site Selection: Assessment Methodology

- 2.11 The assessment of potential site allocations was broadly undertaken in stages, although the process was interwoven with the Sustainability Appraisal and on-going liaison with Parish Councils, their representatives, the Winchester Town Forum, and local community consultation. Liaison with landowners, developers and their agents has also been on-going to establish the availability of sites and the prospects of delivery, with some sites being removed or added during the process as a result.
- 2.12 The assessment has aimed to ensure that the Council meets its statutory obligations and that the sites are selected for a proposed allocation based on a thorough appraisal of their suitability. However the process has also been iterative, more organic than mechanical, with the most suitable sites being identified progressively and in accordance with the principles of localism. The process of site selection is explained more fully in the 'Housing Site Assessment Methodology' background paper.
- 2.13 For the reasons set out in the spatial strategy context provided by the LPP1, the sites to be allocated are associated with Winchester Town and the eight 'MTRA2' settlements (of which Denmead ~~now has an adopted is now developing a~~ Neighbourhood Plan). The assessment process indicated, at a very early stage, that there would not be enough suitable and available land within any of the eight market towns and larger villages to accommodate the required amount of new housing. New allocations would therefore need to be found in the form of sustainable extensions to the existing built-up areas of these settlements, although this is not necessary in the case of Winchester Town.
- 2.14 The process described below relates primarily to the identification and assessment of sites for housing within the MTRA2 settlements. Employment and other community needs, ~~including~~ such as public open space, were also considered and where the evidence base suggested such requirements these were also factored in when sites were being considered. The starting point for identifying suitable sites was the Council's 'Call for Sites', during which a large number of sites were put forward by landowners/developers, and the evaluation of submissions as part of the Strategic Housing Land Availability Assessment (SHLAA).
- 2.15 For Winchester the analysis of completions and commitments, SHLAA sites within the existing urban area, redevelopment opportunities on sites subject to existing planning frameworks and assessments, together with windfall potential, means that no further allocations outside the existing settlement boundary need to be identified.

- 2.16 Initially data sheets and settlement profiles were provided to each of the Parish Councils to gather further baseline information on the existing state and needs of the settlement and its population. Parish Councils were also provided with site assessment checklists for completion based on their local knowledge.
- 2.17 Each site was assessed against a standardised set of key considerations covering a range of matters that affect the suitability of a site for development. The assessment recognised that the presence of one or more of the considerations may or may not render the site undevelopable; that some matters can be mitigated whilst others may be more fundamental and have a detrimental impact on the delivery of a site; and that some matters may only affect part of a site. This initial stage in the process did not therefore eliminate any sites but flagged those with more severe constraints, those with issues needing further investigation and those having more potential.
- 2.18 During this period (January to July 2013) the Parish Councils carried out engagement with various organisations, to assist with the data gathering. They also engaged with their local communities to inform them of the need to identify sites for development and to ask where they considered new development should go. As further information emerged from the work by the Parish Councils the assessment criteria were adjusted with some considerations being expanded in more detail for the second stage of assessment.
- 2.19 Subsequently, sites that could only accommodate less than 10 dwellings were eliminated, as were sites that were distant from the MTRA2 settlements because of their low sustainability. Where sites are within the South Downs National Park but adjacent to one of the settlements, they were flagged as such and still subject to assessments so that Winchester City Council may approach the National Park Authority if it was considered that the site is more suitable for allocation than alternative sites outside of the National Park. In the event, this situation did not arise.
- 2.20 The second stage involved updating the data sheets and profiles, site assessment checklists and preparing more detailed site assessments of constraints to evaluate site options. Specialist knowledge from within the City Council and external organisations was used to carry out assessments in relation to transport and access, landscape sensitivity, the historic environment and other aspects. It also included an initial Sustainability Appraisal of sites in each settlement to identify the likely significant effects on the environment, economic and social factors of the sites as potential allocations.
- 2.21 The final stage was aimed at identifying the preferred allocations. This involved consolidating the information from the specialised assessments of each site together with further emerging information on constraints, with information on community needs and site capacities.
- 2.22 A key element of this stage was the series of workshops held in September 2013 with parish and community representatives for the MTRA2 settlements. In addition to pulling together evidence and findings of research undertaken by

the City Council and the local communities, the aim of these workshops was to consider a draft spatial development strategy for each settlement, including sites to be allocated for development.

- 2.23 Whilst it was clear the various sites had merits and disadvantages, it was equally clear that only a limited number of them would be required to meet each settlement's identified requirement. The pros and cons of having one or two large sites were compared with having a larger number of small sites. By using the established assessment methodology, and having due regard to the community's preferences that had emerged through earlier consultation events, and any community benefits that particular sites could provide (e.g. public open space for the new residents and to reduce existing shortages), the workshops were able to determine a shortlist of preferred sites or options to accommodate each settlement's residual net housing requirement (in Denmead this has been progressed through a Neighbourhood Plan).
- 2.24 These were subject to further consultation with the local communities (from autumn 2013 to early 2014) before each Parish Council recommended its preferred site allocations to the City Council for its consideration in preparing this Draft Plan. Further details, including the outcome of the consultations, are given in the respective settlement sections (4.2 – 4.8) and the Consultation Statement.
- 2.25 The Denmead Neighbourhood Forum undertook its own discussions on site options and appointed an independent planning consultant to assist in drafting the Neighbourhood Plan. The 'Pre-Submission' Plan was approved by the Parish Council in March 2014 and subsequently published for public consultation. It was revised to take account of the comments received, submitted to the City Council, and published for formal comments in September 2014. The Referendum took place on 5 March 2015 and following a positive result, the Denmead Neighbourhood Plan was then made part of the Winchester District Development Plan at its Council meeting on 1 April 2015. Section 4.9 of this document gives more details of the Neighbourhood Plan's preparation and content.
- 2.26 The detailed matters addressed in the overall assessment process were –

## Stage 1: Initial site sieving

### Constraints

- Natural designations: Is the site likely to have a negative impact on a site of international/ national/ local biological or geological importance, e.g. Ramsar, Special Area of Conservation, Special Protection Area, Site of Special Scientific Interest, or Site of Importance for Nature Conservation?
- Historic designations: Is the site likely to have a negative impact on a listed building, a scheduled monument, conservation area, other registered heritage designation or known archaeological features?
- Mineral resources: Is the site identified for safeguarding in the Hampshire

**Minerals and Waste Plan?**

- Trees and planting: Are there protected trees on the site?
- Water course and flooding: Is the site within Flood Zone 2 or 3 (medium–high probability of flooding)?
- Power cables and pipelines: Is the site affected by cables or pipelines to be safeguarded for access?
- Settlement gap: Is the site within a designated settlement gap as defined by LPP1 Policy CP18?
- Highway access: Is the site landlocked, have existing access or may be capable of being accessed by vehicles from an adopted road.

**Consistency with the Settlement Hierarchy and Strategy**

- Is the site within, or adjacent to, the policy boundary of Winchester Town or an 'MTRA2' settlement?
- Is the site unrelated to Winchester Town or an 'MTRA2' settlement?
- Is the site within the South Downs National Park?
- Is the site in conformity with an adopted Village Design Statement or Parish Plan?

**Availability**

- Has ownership of the site been confirmed?
- Will the site be available for development within the plan period?

**Stage 2: Settlement-based Assessments****Initial Sustainability Appraisal**

- Likely significant effects of on the environment, economic and social factors of the potential allocations

**Site Sustainability and Accessibility**

- Proximity to public transport
- Proximity to local shops and services
- Proximity to primary schools
- Pedestrian links
- Vehicular access to the highway

**Landscape Sensitivity Appraisal**

- Physical landscape - landform and land cover, including agricultural land quality
- Experiential / Perceptual - including enclosure, intimacy, tranquillity and the existence of footpaths enabling access and enjoyment
- Historic Environment - including the existence of ancient woodland and parkland
- Biodiversity
- Visibility

**Historic Environment**

- Heritage Assets – including archaeology, conservation area, listed building,

scheduled monument

### Other Datasets and Issues

- Outstanding dwelling requirements – taking account of existing commitments and potential windfalls
- Physical capacity of sites to accommodate dwelling numbers needed
- Open space audit - quantity, quality and accessibility of various types of open space – the levels of surplus or shortage
- Capacity within existing services and infrastructure
- Character and setting of settlement

### Stage 3: Preferred Sites

#### Consistency with key criteria

- Is the site within the settlement boundary?
- If not, is the site adjacent to the existing settlement boundary and well related to the pattern of development?
- Are there physical constraints on the site? e.g. within a medium-high risk flood zone, overhead power line
- Are there national or local policy designations? e.g. Site of Special Scientific Interest, Scheduled Ancient Monument
- Is the site close to existing facilities and services?
- Is there good access onto the site?
- Would the development detract from the landscape, important views and historic environment of the surrounding area?
- Can the site contribute to meeting other identified needs?
- Would development maintain the generally open and undeveloped nature of the gap between neighbouring settlements?
- How did the site rate in community consultation responses?

## Site Selection: Community Engagement

### (i) Market Towns and Rural Area

- 2.27 Community consultation exercises on the site allocations for LPP2 were carried out during 2013 and into the early part of 2014. All the Parish Councils within whose area the MTRA2 settlements are located undertook at least one round of consultation or other form of community involvement to obtain views on, or preferences for, development options. This included Denmead Parish Council through preparation of the Neighbourhood Plan. The approach varied from settlement to settlement, ranging from questionnaires on future needs for housing and facilities, and general locations for development, to exhibitions of

preferred options and prospective developers' outline proposals. The exercise was not just about housing; it also sought to determine amounts and locations (if required) for other forms of development and recreational open space.

- 2.28 Reports of the outcomes of the final consultations were made to formal parish council meetings which considered and accepted the results of the consultation, endorsed the plan for their settlement, and/or agreed the final choice of sites to be recommended to Winchester City Council during spring/summer 2014. The exception is Shedfield Parish Council who made no formal resolution but was kept informed of progress by their Planning Committee, including that due process had been taken to consider available sites.

## **(ii) Winchester Town**

- 2.29 Because Winchester Town is not parished, it was not possible to run workshops along the same lines as those for the rural settlements. However, a workshop with the Town Forum and other key community and economic stakeholders was held in January 2014 to determine the specific development needs of Winchester and the options for meeting them. This was followed by a series of Ward-level public meetings and exhibitions in February/ March 2014 with a view to further refining the development options. Further details, including the outcome of the consultations, are given in Chapter 3.

## **Settlement Boundaries**

- 2.30 Settlement boundaries are in planning terms a policy tool used to indicate on a map where particular policies that permit development within settlements, or restrict development outside settlements, apply. A settlement boundary is the dividing line between built-up/urban development (the settlement) and non-urban or rural development (the countryside). It can serve a number of related, but separate, purposes such as,
- creating an edge to existing development thereby encouraging consolidation;
  - helping to separate communities and therefore retain their individual identities; or
  - defining the logical boundary between areas with different features and purposes, e.g. between areas with environmental or landscape designations and those suitable for development.
- 2.31 The development strategy set out in LPP1 follows a sequential approach to development by establishing the capacity of sites within existing settlement boundaries in the first instance, before allocating sites outside and adjoining existing settlement boundaries to meet needs. Where new allocations are proposed through LPP2 (or adopted in the Denmead Neighbourhood Plan) outside existing settlement boundaries, the settlement boundary ~~will need to be is~~ redrawn on the Local Plan Policies Map to include the new development allocations.

- 2.32 The boundaries of the larger settlements (Bishop's Waltham, Colden Common, Denmead, Kings Worthy, New Alresford, Swanmore, Waltham Chase, Wickham and Winchester Town) with a housing target to meet and/or with other identified growth have therefore been reviewed and the opportunity taken to consider whether other adjustments to existing settlement boundaries are needed. However, given that this Plan allocates all the sites required to meet the identified development needs of the District (including allowances for windfall developments in Winchester Town and Kings Worthy), there is no imperative to make any further adjustment to settlement boundaries. The 'Settlement Boundary Review' background paper sets out the basis for reviewing these boundaries.
- 2.33 Apart from the adjustments resulting from the allocation of specific sites to accommodate the planned growth, the Settlement Boundary Review indicates that settlement boundaries should be revised to take account of some developments that have happened since the boundaries were last defined in the Winchester District Local Plan Review (2006) (WDLPR). Built or committed development on the edge of settlements, where these are integral functionally and visually to the settlement, other than rural exception sites (which should continue to be treated as such), should be considered for inclusion within the settlement boundary. This includes four sites identified as Local Reserve Sites in the WDLPR (under former Policy H.2): Pitt Manor and Worthy Road/Francis Gardens in Winchester; Little Frenchies Field, Denmead; and Spring Gardens, New Alresford. Minor revisions to settlement boundaries are recommended where small sites falling below the size threshold for inclusion as allocations are either surrounded on three sides by existing boundary, or are part of established rear gardens, and were assessed during the site assessment process and found not to be sensitive in landscape terms or otherwise harmful to settlement pattern or character.
- 2.34 The LPP1 makes a number of strategic development allocations at North Winchester (Barton Farm), Bushfield Camp, West of Waterlooville and North Whiteley. As these are eventually built out, they will create new or extended urban areas around which settlement boundaries will need to be defined. The strategic allocations include considerable areas of related peripheral open space so, until the boundaries of these are defined precisely through detailed planning consents, it is not possible or appropriate to define their settlement boundaries at this stage.
- 2.35 Public open space and other undeveloped areas, such as recreational space or school playing fields on the edge of settlements are part of a settlement's social, physical or environmental infrastructure and contribute significantly to the character or setting of a settlement. However, since the settlement boundary defines the edge of the built development, such open spaces should remain outside the defined boundary, where they are also protected from development by countryside policies.

**Appendix 2 - Winchester Local Plan Part 2: Development Management and Allocations Sustainability Appraisal Report**  
**Appendix II - Summary of Responses to the SA Draft LPP2 SA Report (September 2014). Enfusion,**  
**September 2015**

Summarised Comment	Officer Comment / Recommended Response
<b>50085 - Natural England</b>	
<p>Query the appropriateness of aggregating all sites in a settlement into one row per SA objective in Appendix VI - SA of Potential Site Allocations, if the intention is to use the SA to differentiate between the sustainability of the various sites. The scores produced, being an aggregation of the sites concerned, cannot be used to differentiate between sites, and so it is unclear what purpose they serve.</p> <p>We also note that there appear to be a number of errors in site referencing in Appendix VI. For example "Only one site (2938) contains BAP priority habitats including lowland meadows and deciduous woodland. Site 365 also contains a SINC." (p 180) We believe these should refer to sites 2398 and 356 respectively.</p> <p>However, we do not regard these as being serious failings of the SA process.</p>	<p>Noted. The SA considered each site individually against the full SA Framework, identifying any significant effects, as required by the SEA Directive and Regulations, within the commentary for individual sites where necessary in Appendix VI. This is in accordance with the SEA Regulations (2004) that require information in the report to include the "<i>likely significant effects on the environment...</i>" (Schedule 2). This provides a comparative appraisal of all reasonable site options for that settlement or area. The 'scores' or 'significance criteria' reflect the cumulative effects of development at the proposed site options.</p> <p>The errors noted have been amended within Appendix VI.</p>
<b>50693 - Mr Read</b>	
<p>The analysis of the New Alresford section regarding the SA objectives is flawed - based on incorrect evidence.</p> <p>1 Building Communities - the local objections to the Plan are not recognised</p>	<p>Noted. Any representations received on the SA process are considered and responded to as part of the iterative and ongoing SA process.</p>
<p>4. Economy - the jeopardising of local employment by the redevelopment of The Dean and assumption they will be relocated on the green field site at Sun Lane is an untenable</p>	<p>The detailed appraisal for the New Alresford site options has been updated ensure that the loss of existing employment at sites 2534 and 2535 is given appropriate</p>

assumption	consideration. Please see Section 6 and Appendix VI of this Report.
5. Transport - Sun Lane is not served by regular public transport, unlike alternative sites, and the local traffic congestion and inadequate highway access not recognised	<p>Noted and disagree. The SA found in Appendix VI of the SA Report (Sept 2014) that, "all sites (except for 2533) are within a short walking distance (0 - 400m) of bus stops within New Alresford and the bus provides a regular service (Mondays to Fridays (approximately 6.00 am – 7.30 pm) and Sundays and Saturdays) to Winchester, Alton, Petersfield, Southampton and other villages and towns every 30-40 minutes".</p> <p>It also found that development at any of the site options, including Sun Lane, will increase traffic on surrounding roads, particularly during construction, leading to short and long-term minor negative effects.</p>
7. Water - there is local flooding at the SW corner of the Sun Lane site	Existing evidence from the Environment Agency does not indicate that there is any significant areas of flood risk on the Sun Lane site. It is considered that local surface water flooding can be mitigated at the site level through the development control process.
13. Landscape - the complete destruction to ex. planting on A31 embankment and subsequent exposure of the Sun Lane site is not noted. Also the major change to the setting of Alresford by the Sun Lane not considered.	The SA found that there is the potential for negative effects on the landscape as a result of development at the Sun Lane site.
The summary of the SA for New Alresford (para 4.23) has unreasonable judgements - contrary to Wednesbury rules - regarding the evidence. The Sun Lane site does not give rise to minor traffic impacts - over 2000 vehicles will be generated by the housing, employment and new A31 junction and a significant portion will be added to local inadequate residential streets.	The nature and significance of the effects identified through the independent SA are based on existing evidence and professional judgement.
Further ore there is no recognition of the loss of local employment caused by The Dean development	Noted. The detailed appraisal for the New Alresford site options has been updated ensure that the loss of existing employment at sites 2534 and 2535 is given appropriate consideration. Please see Section 6 and Appendix VI of this Report.

<p>It should be further noted the SA is unbalanced and the 'iterative' process as required by Government guidance has not been undertaken</p> <p>Accordingly the SA should be revised and based on better evidence particularly regarding the details now established especially regarding both the Sun Lane and The Dean sites. Moreover there should be a level playing field in assessing the different alternative with all examined with the appropriate detail</p>	<p>Noted and disagree. A fair, consistent and comparative appraisal of reasonable site options has been carried out, which meets the requirements of the SEA Directive and Regulations and is in line with extant government guidance.</p>
<p>Finally the SA is flawed in not considering the basic strategic options for the development of New Alresford i.e. a concentrated approach or dispersal</p>	<p>The alternative proposed by the Alresford Professional Group was not available when the SA of the draft LPP2 was undertaken. The SA considered the reasonable alternative sites available at the time which included some of these sites, but not all of the ones proposed by the Group. As part of the iterative and ongoing process the Alresford Professional Group alternative plan has been considered through the SA.</p>
<b>51095 - Mr Pugh</b>	
<p>The SA highlights the unsuitability of SHLAA site 365 for development.</p>	<p>Noted. The SA does not determine the suitability of a potential site option for development, it identifies likely significant effects against SA Objectives. It should be noted that SA is a tool to inform plan-making; it does not comprise the only reasoning for the selection or rejection of sites.</p>
<b>51465 - Apache Capital</b>	
<p>To provide a robust and transparent appraisal of the available sites, the SA should be revisited and each of the sites tested individually against the SA objectives and then compared to one another.</p>	<p>Noted and disagree. Please refer to the response for Rep 50085.</p>
<p>The SA should also test reasonable alternative strategies, including the option of exceeding the residual housing target to deliver wider community benefits.</p>	<p>The Council's assessment of sites, which includes the initial SA of site options, resulted in the identification of 3 shortlisted sites that could potentially accommodate the housing requirement.</p>

	<p>Given the number of dwellings needed to meet the housing requirement, the choice was about selecting one of three possible alternatives rather than spreading development across the sites.</p> <p>The Council asked each of the three options to put forward their proposals for achieving wider community benefits (open space) and this has been achieved without exceeding the housing target). Extensive public consultation was carried out with the local community and the Lovedon Lane site received the most support.</p> <p>The SA is an iterative process and an Initial Sustainability Appraisal of Potential Allocations was undertaken in September 2013 to inform the site selection process. This was published and available for people to take into account during the process of consulting on potential sites. The SA of the draft Local Plan has also been published, as will future iterations.</p> <p>Site 2508 performs well on certain factors, such as proximity to the settlement and facilities/services, but shares some constraints with the Lovedon Lane site and has other additional constraints. The site therefore warranted inclusion as a shortlisted site, but it is not the case that technical evidence has been set aside or that excessive weight was given to public views rather than the SA. The public consultation concluded that the Lovedon Lane site best satisfied the criteria used for site selection and the technical assessment of the evidence supports this.</p> <p>The site promoter suggests that consideration should have been given to allocating a combination of sites. However, the amount of greenfield housing required in Kings Worthy is limited and each of the 3 shortlisted sites is already larger than</p>
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	<p>needed to accommodate it. Spreading the housing over a combination of sites would be likely to reduce the ability of site promoters to provide infrastructure and offer the remainder of their sites as open space, which they all did. In addition, the part of the nearest site (Lovedon Lane) which has been identified as being suitable for development does not adjoin site 2508, so a combined development is unlikely to be desirable or feasible. Accordingly, site 2508 does not warrant allocation as a housing site either instead of, or in addition to, all or part of the proposed site at Lovedon Lane.</p> <p>The objectively assessed need was established in LPP1 for 'about' 250 dwellings and to significantly exceed this wouldn't be a reasonable alternative as it would conflict with the LPP1 strategy. LPP2 is planning for this need, not reviewing the level of growth to be provided at individual settlements. The Council therefore considers that at this time, there are no reasonable alternatives to the housing requirement for the individual settlements as set out in LPP1. The Council acknowledges that following the adoption of the Local Plan (Part 1 &amp; Part 2) a review may be needed in light of the outcomes of the PUSH Spatial Strategy (chapter 1, para 1.7/8). Any review of the Local Plan (including Part 1 &amp; Part 2) or the overall housing needs will need to be considered through the iterative and ongoing SA process.</p>
<b>51466 - Bloor Homes</b>	
We note that, for both the SA published for the community consultation on the Local Plan Part 2, and the October 2014 update, the site options for Wickham have not been tested individually. Rather the assessment has been undertaken in a more general and discursive way. The SA should contribute to providing a clear audit trail in justifying the proposed strategy as the most effective option when considering the alternatives. Without individual assessment of the site options against the SA objectives, it is difficult to compare the sites.	Noted and disagree. Please refer to the response for Rep 50085.
In addition, the SA has not tested the merits of alternative strategies. There is no comparison, for example, of the sustainability merits of a dispersed strategy against a	The Council's assessment of sites, which includes the initial SA of site options, resulted in the identification of 4 shortlisted sites that could potentially

<p>single urban extension. Nor is there assessment of dispersing development across the three shortlisted sites. The reasonable alternative of delivering more homes than the residual requirement should also be tested, considering the wider community benefits that could be delivered through a higher level of growth (policy MTRA2 of the Local Plan Part 1 does not set a maximum target).</p>	<p>accommodate the housing requirement.</p> <p>One of the principles developed by the Neighbourhood Planning Steering Group through its work with the community was that any housing outside the settlement boundary should be accommodated over 3-4 sites. However, those sites which were subsequently found to be available and most suitable for development were all large sites. To have allocated 3-4 of the shortlisted sites, for example, would have meant including sites which may be less suitable, and allocating considerably more land than needed. It would not be justified to limit the area allocated on the most suitable sites, by using sites that were not needed and less suitable, solely to achieve a larger number of sites. The Plan's strategy, therefore, followed the principle of using a number of sites, so far as could be justified taking account of the nature of the sites available and the assessment of their suitability.</p> <p>While it would not be justified to select sites that are inferior in planning terms simply to spread development or concentrate it, the strategy proposed in the Local Plan allocates those sites which perform best against planning criteria and which best meet the needs and aspirations of the community.</p> <p>The objectively assessed need was established in LPP1 for 'about' 250 dwellings and to significantly exceed this wouldn't be a reasonable alternative as it would conflict with the LPP1 strategy. LPP2 is planning for this need, not reviewing the level of growth to be provided at individual settlements. The Council therefore considers that at this time, there are no reasonable alternatives to the housing requirement for the individual settlements as set out in LPP1. The Council acknowledges that following the adoption of the Local Plan (Part 1 &amp; Part 2) a review may be needed in light of the outcomes of the PUSH Spatial Strategy (chapter 1, para 1.7/8). Any</p>
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	review of the Local Plan (including Part 1 & Part 2) or the overall housing needs will need to be considered through the iterative and ongoing SA process.
<b>50633 - Alresford Professional Group</b>	
There is no evidence that an appropriate SA has been undertaken in accordance with guidance. According to the guidance, a SA is an iterative process by which proposals are continuously evaluated against sustainability criteria and alternative scenarios. It is the view of the local community group that alternative plan should be considered as part of the SA process.	The alternative plan was not available when the SA of the draft LPP2 was undertaken. The SA considered the reasonable alternative sites available at the time which included some of these sites, but not all of them. As part of the iterative and ongoing process the Alresford APG alternative plan has been considered through the SA.
<b>51132 - Mr Kerr-Smiley</b>	
The Dean site is on land that was previously used as a gas works. This should be explicitly considered within the LPP2 paper and a suitable Sustainability Appraisal should be completed.	The SA recognises in Appendix VI of the SA Report (Sept 2014) that there is the potential for contamination at the Dean site as it contains oil and grease drainage tanks - one near the old gas works and that there have also been problems with the storm drains near the river and there are underground petrol storage tanks at the bottom of West Street.
<b>51443 - Bloombridge Residential Ltd</b>	
The Sustainability Assessment ("SA") was not undertaken in accordance Section 12 (2)(b) of the Strategic Environmental Assessment Regulations because it did not assess reasonable alternatives, including 1871.	Noted and disagree. All reasonable site options available at the time of the appraisal were subject to SA, including site option 1871, with the detailed findings presented in Appendix VI of the SA Report (Sept 2014). Any reasonable site options proposed through consultation will be considered as part of the iterative and ongoing SA process.
The SA simply assessed sites rather than options – one option being a smaller site at Church Lane, and another being dispersed growth where housing numbers are shared, for example between 1871/2561 and 275. Overall, the SA appears to have taken an approach that has focused on 'adequacy' as opposed to the more aspirational approach required, for example, by paragraph 14 of the NPPF. Sustainable development is meant to be the 'golden thread' running through the whole planning process – 'adequate' is not enough.	The site options were compared using the assessments undertaken by technical officers of Winchester City Council, the initial results of the SA of site options together with the outcome of community consultation. The location of the most suitable sites in planning terms and public preference formed the basis for the development strategy which centred along Main Road. The justification and deliverability of such a strategy was debated with the community representatives

<p>We therefore OBJECT to the SA and request that it is revisited with the explicit objective of allocating the most sustainable housing options for Colden Common.</p>	<p>which included discussion about the pros and cons of delivering the housing requirement at an individual site compared to multiple sites.</p> <p>The views of the local residents were that the housing requirement should be provided on one site rather than dispersed over a number of different sites. The Council's assessment of sites, including the initial SA of site options, informed the discussions with the local residents.</p> <p>It would not be justified to select sites that are inferior in planning terms simply to spread development or concentrate it and therefore the strategy proposed in the Local Plan allocates the sites which perform best against planning criteria and which best meet the needs and aspirations of the community. The findings of the assessments and the responses from the local community informed the Council's decision that a multi-site or dispersed option is not a reasonable alternative for the delivery of the housing requirement in this settlement.</p>
<p>Paragraph 4.49 of the SA explains that the findings of the SA can help with refining and further developing the options in an iterative and ongoing way. Whilst we are disappointed and aggrieved that our revised Master Plan has not been assessed by the latest SA (indeed this is inexplicable given that the representations we made in November 2013 proposed 1871 and part of 2561 for development), this omission can easily be rectified. Until a corrected SA is available, we would request that 275 is not progressed any further.</p>	<p>Noted. The representations referred to were made in relation to the Plan and the call for sites in November 2013. The representation and all the information submitted have been reviewed and are not considered to significantly affect the findings of the appraisal presented in Appendix VI of this Report.</p>
<p>We note that paragraph 4.17 (page 44) of the SA suggests that all of the 20 sites assessed are sustainable. Whilst this might suggest that Colden Common can accommodate substantially more than the limit of "about 250", we note that this paragraph does not mention the National Park. We believe this has a limiting factor on what sites may be considered to be sustainable. We would categorize the National Park as an "exclusionary criteria" (paragraph 4.2 of the SA) or an "absolute constraint" (Table 2.3, page 23). Why</p>	<p>The SA does not state that all of the 20 site options are sustainable, it states that it found <i>"that the potential allocations within or immediately adjacent to Colden Common's boundary were likely to progress the majority of the SA Objectives"</i>. The appraisal matrix for Colden Common in Appendix VI has been updated to identify which sites are situated adjacent to the National Park.</p>

take the risk? The precautionary principle should apply.	The criteria used by the Council in its site selection method and the weight given to them is a matter for plan-making.
<p>Paragraph 4.18 tabulates key negative and key positive effects.</p> <p>a. With regard to transport, we consider that any sites that are not within the 800m (“good”) accessibility limit should be classified as “Key Negative” – that would include 275. It would also be normal to categorize sites that satisfy the ‘walkability’ criteria, such as 1871 and 2561, as “Key Positive”.</p>	Opinion noted.
b. On landscape, we note that 1871 is in the list as “Key Negative”, but the other part of our Church Lane site, 2561, is not. Nor, in explicably, is 275 – given its location adjoining the National Park and ancient woodland.	Noted. Site 275 is identified within Appendix VI and Table 4.2 as potentially having a significant negative effect on landscape and soils. It is agreed that site 2561 should also be included in the list of potential sites where there is the potential for a key negative effect on landscape and soils. The appraisal matrix for Colden Common in Appendix VI has been updated to reflect this as well as the summary of key negative effects presented in Section 6. It now also identifies which sites are adjacent to the National Park.
c. If 275 qualifies as a “Key Positive” for Building Communities, then the ability to provide public open space in the south part of Colden Common (in accordance with the objectives of the VDS) should be a “Key Positive” for 1871/2561. In a similar vein, under mitigation, we note that 1871 could deliver “minor positive effects” for biodiversity and there is the potential for positive effects on heritage.	Noted. The SA identified that there is the potential for a positive effect against SA Objective 1 for site option 275 as it contains brownfield land and the redevelopment of these brownfield areas could improve the quality of the area for communities. Site options 1871 and 2561 do not contain any brownfield land.
Table 4.14 (page 70). We do not accept the explanation of why 275 was selected. It makes no reference to the criteria assessed in the SA or indeed the <i>relative</i> performance of 275 having regard for these criteria. The SA is meant to test (and preferably rank) the sustainability of various options.	Noted. Table 4.14 sets out the Council’s reasons for the selection or rejection of reasonable site options in plan-making, not the SA. The SA findings are considered by the Council in its selection of options and form part of the evidence supporting the Local Plan, the SA findings are not the sole basis for a decision; other factors,

	including planning and deliverability, play a key role in the decision-making process.
In our opinion, as set out in Section 2.1 of these representations, our revised Master Plan for 1871 and 275 performs significantly better (and avoids significant adverse impacts) in relation to the National Park, landscape character and accessibility.	Opinion noted.
Table 4.14 (page 71). We do not accept that listing 1871/2561 as a site “less supported by the local community” is an appropriate reason for the SA to reject these sites. This is not a criteria grounded in sustainability and, besides, the difference in support (as explained elsewhere in this document) was not subject to scrutiny by WCC or Enfusion.	Noted. As previously stated above, Table 4.14 sets out the Council’s reasons for the selection or rejection of reasonable site options in plan-making, not the SA. The SA findings are considered by the Council in its selection of options and form part of the evidence supporting the Local Plan, the SA findings are not the sole basis for a decision; other factors, including planning and deliverability, play a key role in the decision-making process.
We do not accept the findings of the landscape assessment for 1871/2561, which changed from not being sensitive in the July 2013 assessment to most/highly sensitive in October 2013 (see Appendix 2). This therefore has substantial implications for the conclusions of the SA.	Noted.
In light of the above, we request that Enfusion’s Initial SA of Potential Allocations in Colden Common (September 2013) is updated but on a site by site comparative basis. The intention of the SA is to ensure that WCC gets the fundamental question right – ie the choice of site(s) when balanced against reasonable alternatives. And a comparison is required. This is not an onerous task, given that a number of sites have been screened out. We suggest that Sustainability Objective 13 of the SA fully addresses potential impacts on the National Park.	Noted. Please refer to the response for Rep 50085.
<b>51452 - Gladman</b>	
Gladman contend that the SA fails to analyse reasonable alternatives in respect of the overall housing allocations in light of more up to date guidance provided by PPG.	The objectively assessed need was established in LPP1 and to significantly exceed this wouldn’t be a reasonable alternative as it would conflict with the LPP1 strategy. LPP2 is planning for this need, not reviewing the level of growth to be provided at individual settlements. The Council therefore considers that at this time, there are no reasonable alternatives to the housing requirement for the
The SA recognises that Winchester District’s population is increasing at a more rapid rate	

<p>than surrounding areas, with the majority of the population residing in rural locations. It is also recognises that house prices are significantly higher when compared to the rest of the South East region and that there is an identified shortage in affordable housing provision within both city and rural areas. The Council consider that the Local Plan overall will have the potential for major short to long term positive effects through the provision of 12,500 dwellings over the plan period. Gladman dispute that this is unlikely to happen due to the Council's shortcomings.</p> <p>PPG and the SEA directive requires that the LPP2 must consider all reasonable alternatives in the production of the SA. The SA in its current form provides an assessment of alternatives based on the 15 objectives. However, the SA fails to recognise the importance of the Plans requirement to meet the identified affordable needs of the district. Gladman agree with the SA that if the affordable housing rate is increased in line with the assessed need it would certainly lead to viability issues.</p> <p>The SA should assess how affordable housing provisions could be met through its assessment of reasonable alternatives.</p>	<p>individual settlements as set out in LPP1. The Council acknowledges that following the adoption of the Local Plan (Part 1 &amp; Part 2) a review may be needed in light of the outcomes of the PUSH Spatial Strategy (chapter 1, para 1.7/8). Any review of the Local Plan (including Part 1 &amp; Part 2) or the overall housing needs will need to be considered through the iterative and ongoing SA process.</p>
<p>The SA also fails to provide a suitable alternative for the Parish of Denmead and only includes recommendations for the Parish. These recommendations are not included in table 4.14 – 'Reasons for Selecting or Rejecting Sites in Plan Making,' as they have been selected or rejected through the Neighbourhood Planning process. Gladman contend the DNP is still subject to successful Examination before proceeding to referendum. The SA should incorporate appropriate site allocations that meet the objectives of the Local Plan should the DNP be found to not meet the basic conditions and therefore not be capable of proceeding to referendum or being made.</p>	<p>Sites in Denmead are now allocated in an adopted Neighbourhood Plan. As this is now the development plan for the area, no amendments are proposed to the Neighbourhood Plan site allocations through LPP2. The Denmead Neighbourhood Plan was subject to a full SEA with the Environmental Report available online<sup>2</sup>.</p>
<p>It is unclear why the SA has failed to test whether the LPP2 can accommodate additional</p>	<p>The objectively assessed need was established in LPP1 and to significantly exceed</p>

<sup>2</sup> <http://www.winchester.gov.uk/planning-policy/neighbourhood-plans/dnp-submission/>

<p>sites which could help meet some of the identified affordable housing need. The Council should test its SA against a higher housing requirement that would encourage a 'pro-growth' scenario in line with national policies to meet the full OAN for market and affordable housing. This approach could therefore be considered consistent with the social aspect of the SA process.</p> <p>If it is found that a higher housing requirement can be delivered, the Council should work towards this figure and allocate additional housing sites to fulfil this need. This approach will help the Council address the significant affordability gap currently experienced in the local authority until such time as a Local Plan review is undertaken.</p>	<p>this wouldn't be a reasonable alternative as it would conflict with the LPP1 strategy. LPP2 is planning for this need, not reviewing the level of growth to be provided at individual settlements. The Council therefore considers that at this time, there are no reasonable alternatives to the housing requirement for the individual settlements as set out in LPP1. The Council acknowledges that following the adoption of the Local Plan (Part 1 &amp; Part 2) a review may be needed in light of the outcomes of the PUSH Spatial Strategy (chapter 1, para 1.7/8). Any review of the Local Plan (including Part 1 &amp; Part 2) or the overall housing needs will need to be considered through the iterative and ongoing SA process.</p>
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