

Winchester District Local Plan Review

Analysis of Representations on the Proposed Modifications

Chapter 6: HOUSING

Summary of Representation.
Change sought

Recommended Response to Representation
Recommended Change

MOD 6.3 Paragraph 6.7

Recommended Response to Representation

Representations:

- **Support:**

Taylor Woodrow Developments Ltd (397/3), Mrs Payne (863/4)

- **Objections:**

Cala Homes (220/2)

Object to revised wording as it makes no reference to the need for the City Council to trigger the release of the Local Reserve Sites.

Change sought – revise paragraph to refer to trigger mechanism established for new Policy (MOD 6.12)

The support is welcomed.

The wording changes which are put forward as part of MOD 6.3 are exactly as recommended by the Inspector. The revised wording refers to 'the implementation of Local Reserve Sites' and such implementation could only happen if the sites were first triggered. Given that this reference is part of the Plan's overall housing strategy, there is no need for more detail to be included in this part of the Plan.

Recommended Change:

None.

MOD 6.5 Paragraph 6.6

Recommended Response to Representation

Representations:

- **Objections:**

Eagle Star (Estates) Ltd (352/2)

It is clear that there is no need to release the Winchester City (North) reserve MDA during the Plan period. This has been supported by the recent appeal inquiry Inspector and the Secretary of State. There is a precedent for this in Hampshire as both Eastleigh and Basingstoke and Deane have dropped MDA allocations because monitoring has shown there is no need for the development of those particular sites in the Plan period. Both these MDAs were baseline proposals whereas Winchester City (North) is a reserve

The Inspector and the Secretary of State, in determining the Section 78 Appeal at Barton Farm, considered that there was at that time no compelling justification for the release of this strategic reserve site. However the Secretary of State concluded that housing proposals (throughout the county) must come forward to meet the Structure Plan requirement or the H4 reserve provision will need to be released (paras 21 and 25 ODPM decision letter dated 20 Feb 2006). It is therefore incorrect to infer that the Inspector and Secretary of State support the respondent's view that 'there will be no need to release the reserve MDA at Winchester City (north) during the plan period'.

In the relevant paragraph of the letter from the ODPM referred to by the respondent (para 31) the Secretary of State is specifically addressing the issue of releasing the site to meet any potential shortfall in Winchester's baseline housing provision up to 2011. However, Policy H4 in the Structure Plan makes it clear that the reserve MDA at Winchester City (north) is a strategic allocation and its release would depend on the rate which housing is being provided across the Structure Plan area as a whole.

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Recommended Change

proposal. The Council has at its disposal the West of Waterlooville MDA and the Local Reserve Sites. These are better options for meeting additional housing requirements than the major reserve MDA. The Plan should therefore be further modified by deleting the Winchester City (North) allocation, and designating it as countryside or possibly as a green wedge to protect the historic core of Winchester.

Change sought – delete reserve MDA at Winchester City (North)

S Duck (2500/2), S Duck (2501/2)

There is no need for Local Reserve Sites as the urban capacity study demonstrates that the development requirements can be met by sites in the built-up areas together with the two MDAs.

Object to the allocation of the Pitt Manor Local Reserve site because its development would harm the countryside and Romsey Road could not take more traffic.

Change sought – delete Local Reserve Sites

The Local Plan Inspector was in no doubt that 'the Structure Plan has already determined i) that there will be a reserve provision of 2,000 dwellings; ii) that the provision will be in the comprehensive form of a MDA, and iii) that the location will be in or close to the north of the city of Winchester. Planning legislation requires a Local Plan to be in general conformity with the Structure Plan for the area that it covers and I do not therefore regard these three matters to be within the discretion of the council to alter, even if it were minded so to do'. (Inspector's Report para 12.15.5). It would not therefore be appropriate to delete the reserve MDA from the Plan and to do so would take the Plan out of general conformity with the Structure Plan.

This Proposed Modification refers only to the Strategic Reserve Sites, not Local Reserve Sites. The questions of whether there is a need to identify Local Reserve Sites, and of the merits of the sites themselves, are dealt with below, in response to representations on MOD 6.12.

Recommended Change:

None

MOD 6.10 **Paragraph 6.24**

Representations:

- **Support:**

Hampshire County Council
(Estates) (1434/2)

Support the deletion of paragraph 6.24.

Recommended Response to Representation

The support is welcomed.

Recommended Change:

None.

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Change sought

Recommended Response to Representation
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MOD 6.11

New subheading and paragraph following paragraph 6.24

Recommended Response to Representation

Representations:

- **Support:**

Redrow Homes (Southern) Ltd (474/1), Mrs Payne (863/5)

Support the identification of Local Reserve Sites to meet the baseline housing requirement of the Structure Plan, and the differentiation between strategic and local reserve sites.

Taylor Woodrow Developments Ltd (397/4)

The Proposed Modification is in conformity with the Inspectors' recommendation and there have been no changes in circumstances.

- **Objections:**

Bovis Homes (205/1), Heron Land Developments Ltd. (2497/1)

A proportion of the Structure Plan reserve allocation at Winchester City (North) should be released to make up any shortfall in meeting the District's baseline housing requirement. This would accord with the principle of Structure Plan Policy H4. The ad hoc release of a number of greenfield sites undermines the purpose of this policy, which is the established mechanism for addressing any shortfall in provision.

Change sought – *change wording to refer to release of a proportion of Winchester City (North) site in lieu of other named sites*

Cala Homes (220/3)

The support is welcomed.

The reserve allocation at Winchester City (North) is identified to satisfy the requirement of Structure Plan Policy H.4 for an appropriate strategic reserve, over and above the 'baseline' housing requirement in the Structure Plan. The Inspectors were clear that the Local Plan needed to make such provision in order to be in general conformity with the Structure Plan. They also saw a clear distinction between the strategic reserve and the Local Reserve Sites which they recommended, not least because the Local Reserve Sites are aimed at ensuring that the District's 'baseline' housing requirement is met. It would not, therefore, be appropriate to mix strategic and local reserve provision given the way that the Structure Plan deals with the housing requirements. To do so would mean that the Local Plan would not be in conformity with the Structure Plan requirement to plan for a strategic reserve of 2000 dwellings at Winchester City (North).

It is accepted that the longer-term requirement for Local Reserve Sites (and strategic Reserve Sites) should be reviewed through the Council's Local Development Framework. In particular, the Council plans to produce a 'Core Strategy' which will establish the overall development strategy for the District to reflect the requirements of the South East Plan, and a 'Development Provision' document which will identify appropriate sites for development. However, these documents will be required to conform with the South East Plan and the latter will not be adopted until 2011. The Local Plan therefore needs to be progressed to adoption to provide planning policy guidance and adequate housing provision for the next 5 years or so, in accordance with the requirements of the current Structure Plan. The Core Strategy and Development Provisions Development Plan Documents will provide the opportunity to review all of the Local Plan's strategy and allocations to take account of needs to 2026. This may result in the Local Reserve Sites being deleted, confirmed as full allocations, or retained as reserve provision.

The trigger process for the release of the sites is set out in the new paragraphs at MODs 6.14 and 6.15 and further amplified in the Local Reserve Sites Policy SPD, in line with the recommendation of the Inspector. References to the Local Planning Authority in this paragraph as elsewhere in the Plan are to the City Council. The SPD further clarifies that the local

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Change sought

The text should be revised to clarify the trigger process and the determining authority for the release of local reserve sites (wording suggested).

Change sought – add wording suggested.

Eagle Star (Estates) Ltd (352/3)

Support identification of Local Reserve Sites should additional land need to be released. The release of small sites would provide a more flexible response towards meeting any shortfall in the period to 2011. The long-term requirement for these Local Reserve Sites should be reviewed in the LDF process, when the regional requirements of the South East Plan are known.

Change sought – not specified.

Denmead Parish Council (2246/1), P Stallard (2534/1)

The case for the release of local reserve sites is not proven. The Annual Monitoring Reports show that the Council is on target for meeting the Structure Plan dwelling requirement. The concept of Local Reserve sites was not considered as part of the Plan process and is not mandatory.

Change sought – delete text relating to Local Reserve Sites

S Duck (2500/3), S Duck (2501/3)

There is no need for Local Reserve Sites as the urban capacity study demonstrates that the development requirements can be met by sites in the built-up areas together with the two MDAs.

Object to the allocation of the Pitt Manor Local Reserve site because its development would harm the

Recommended Response to Representation

Recommended Change

planning authority will be responsible for the release of the Local Reserve Sites, whereas the Strategic Planning Authorities (Hampshire County Council, Portsmouth City Council and Southampton City Council) will be responsible for taking decisions on the release of the Structure Plan Reserve Sites. The essence of the wording suggested by the objector is included in the new policy itself (MOD 6.12) and there is no need for further clarification.

It is accepted that there is no need at the present time to release the Local Reserve Sites, as indicated by the Council's recent Annual Monitoring Report. If the Inspectors had found an immediate need to increase the supply of housing land it would be expected that they would have recommended allocating the sites for immediate development but, in the event, they identified a potential need which should be kept under review through monitoring. The Inspectors therefore felt that the Council may be right in its assertion that adequate housing land was provided by the Local Plan, but were concerned that the Plan had no 'fall-back' position if this proved not to be the case (other than to release a large-scale strategic Reserve Site). If housing provision started to lag behind Structure Plan requirements this could lead to a shortfall of housing provision and increased pressure to release un-planned sites through planning applications and appeals.

The Inspectors' approach of identifying Local Reserve Sites respects the 'brownfield first/greenfield last' approach promoted in Government policy by resisting the release of the greenfield sites involved unless other, more sustainable, sites fail to achieve the required housing provision. It is also consistent with 'plan, monitor and manage', whereby it is no longer expected that Local Plans should freely release greenfield sites to meet their whole housing requirement, but that housing provision should be managed to promote the use of brownfield sites and sustainable locations. Sometimes such management is achieved by ranking allocated sites and specifying the order of their release, and in other situations it can be done by identifying reserve provision. The identification of reserve sites is, therefore, not a mandatory approach, but it is an established means of implementing 'plan, monitor and manage' which the Inspectors were entitled to consider. Indeed, some Local Plan objectors did promote such an approach, either generally or for specific sites, and it was therefore considered through the Local Plan process.

The Local Reserve Sites policy is not a 'major new strategy' or policy in itself. Rather, the Inspectors saw it as a way of

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Change sought

countryside and Romsey Road could not take more traffic.

Change sought – delete Local Reserve Sites

CPRE (2530/1)

Oppose the selection of Local Reserve Sites as significant brownfield windfall sites have emerged in the District. Dwelling completions will therefore exceed the maximum number anticipated by the Inspectors.

Change sought – consider alternative brownfield locations to meet any identified shortfall

P J & S K Morgan (2532/1)

Oppose introduction of a major new strategy of local reserve sites without consultation.

Change sought – delete text relating to Local Reserve Sites

Recommended Response to Representation

Recommended Change

increasing the likelihood that the Structure Plan's baseline housing requirement would be met (Inspectors' Report, paragraph 6.5.10) and there were 2 main factors that persuaded them such an approach was needed:

- (i) "The reliance on a large number of fairly or very small sites." These sites can generally be categorised as 'windfall' sites, although the Council argued at the Inquiry that it had identified many of them through the Urban Capacity Study. As their name suggests, windfall sites are inherently difficult to predict and the Inspectors were particularly concerned that the assumptions included many small sites, over which the Council has little control or influence. The quantity of dwellings being developed on windfall and Urban Capacity sites annually can vary widely, from 152 in 2000/2001 to 445 in 2004/2005 (Annual Monitoring Report, Table 3).

It is indeed true that significant windfall/Urban Capacity sites have emerged, and the level of completions does generally seem to be rising. Whilst some of the sites can be large, most are small. Sites such as the Police Headquarters are rare and there is currently no certainty that it will be made available for housing development. Windfall sites therefore remain an area of uncertainty as to future supply.

- (ii) "The environmental constraints on achieving the PPG3 range of densities on which the Council largely relies." The Inspectors considered that PPG3 density policy must be applied with some sensitivity in certain areas and that this may conflict with the need to maximise the potential of development sites so as to achieve housing provision. The Inspectors felt there will be areas whose character is such that PPG3 densities could not be achieved, and this sentiment is now reflected in the Plan (MOD 6.61). However, a more sensitive approach to density issues will reduce the housing potential of some sites and it is therefore important that there is some means of increasing housing provision should this prove necessary.

Accordingly, therefore, the reasons why the Inspectors felt a Local Reserve Sites policy to be necessary still remain. In

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addition, the situation in relation to the implementation of the West of Waterlooville MDA has slipped since the Inquiry, as discussed below. Accordingly, whilst it is to be hoped that the Local Reserve will not need to be called upon, the need for such a 'fall-back' provision has not diminished.

Recommended Change:

None.

MOD 6.12
New Policy following MOD 6.11

Recommended Response to Representation

The support is welcomed.

General

Principle of Local Reserve Sites

Representations:

Concept of Local Reserve Sites

- **Support:**

It is accepted that there were objections at various stages of the Plan and by various respondents regarding the adequacy of the Plan's housing provisions and suggested means of addressing the alleged shortcomings. These did indeed include suggestions of additional greenfield releases, either as 'normal' housing allocations or as 'reserve' sites. The Council considered these representations and decided against proposing further allocations, either at the Revised Deposit stage or prior to the Inquiry. The Inspectors considered the various objections and, despite generally supporting the Council's case on housing provision, they felt that there needed to be more certainty that adequate housing provision would be achieved. They recommended the Local Reserve Sites policy in order to provide this certainty and to enable the Council to 'manage' any shortfall of provision.

Redrow Homes (Southern) Ltd
(474/2)

Support identification of land at Francis Gardens as a Local Reserve Site.

Taylor Woodrow Developments Ltd
(397/5)

The Proposed Modification is in conformity with the Inspectors' recommendation and there have been no changes in circumstances.

- **Objections:**

J Hayter (138/17), Bishop's
Waltham Society (2355/3)

Only the table of sites was recommended by the Inspector. The wording should not refer to housing "and related" development as this is not clear. It should be modified to include an allowance for windfalls in the release criteria (wording change suggested).

It is normal for Inspectors to recommend additional allocations selected from omission sites, if they feel that the Plan would not bring about adequate housing provision. This situation has occurred with the Council's previous Local Plans and the Council considered this possibility and the risks involved prior to the Public Inquiry and decided to proceed without identifying any sites itself or offering guidance to the Inspectors on how they should select sites if they felt a need to. Inspectors would traditionally recommend a 'full' allocation of the sites concerned, but in this case the Inspectors have recommended holding the sites in reserve until such time as they are needed.

The Revised Deposit objection expressed concerns that the required

Whilst there may be concern that certain sites have been named by the Inspectors, this is normal and the alternative

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supply would not be delivered and suggested identifying reserve sites whose release would be under the Council's control. It is not unusual for an Inspector to recommend additional allocations selected from omission sites. The only difference here is that they would be held in reserve. It was common knowledge to councillors and residents that, if the Inspector decided there would be a housing shortfall, greenfield land would need to be allocated.

The 04/05 Housing Monitoring Report's conclusions illustrates that one reason for needing reserve sites is the inherent uncertainty in projecting the supply forward. The MDA supply risk was demonstrated when the minimum supply was cut from 2000 to 1600 dwellings. This has still not been converted into planning applications, and the Council has failed to initiate compulsory purchase. The risk is now greater than at the Inquiry.

Change sought – amend wording as suggested

D Clarke (135/1), F Clarke (136/1), P H Radcliffe (1245/1), P Neyroud (2354/1),

Object to the naming of reserve sites in the Plan as they were considered and rejected at earlier stages of the Plan. Their naming will lead to pressure for development, and encourage their development when this Plan is reviewed. There will be sufficient windfall sites and therefore there will be no requirement for further housing.

Change sought – delete named reserve sites

Winchester City Residents'

Recommended Response to Representation

Recommended Change

would be to create uncertainty around a large number of 'omission' sites. It is in fact helpful if Inspectors can be as specific as possible over the extent of any potential shortfall they identify and their recommended solution to that situation, even though their conclusions may not reflect the Council's case at the Inquiry. In this respect, the identification of the recommended Local Reserve Sites is helpful and avoids the need for the Council to re-assess all the omission sites in order to select a short-list of Local Reserve Sites. Such a process would have led to calls for a further Inquiry which it would be difficult to resist.

Clearly the Inspectors' identification of these sites as the most suitable if further development is needed does highlight them, but the alternative would have been to recommend them as 'normal' allocations for immediate development, rather than not to have any sites at all. The Council must respond to the Inspectors' recommendations and have clear and cogent reasons if it seeks to reject them, even though it clearly would have preferred the Inspectors to accept its argument that no additional land should be identified. The sites cannot now be 'unidentified' so the best way to ensure that they are only developed if a need exists is to put in place a sound Local Reserve Sites policy to control their release. It will be possible to review the status of the sites through the production of the Council's Core Strategy and Development Provisions Development Plan Documents, as part of the preparation of the Local Development Framework. Work on the Core Strategy is due to start once the Local Plan is adopted. It is likely that there will be three options when the sites are reviewed: firstly to retain them as reserve allocations; secondly to make them full allocations (possibly with guidance on the sequence of their release); and thirdly to abandon them as allocations. The decision may be different for different sites and will be largely influenced by future development requirements, as currently being developed through the South East Plan. There will, of course, be public involvement and consultation on any future review, and ultimately scrutiny through an independent examination.

Choice of Sites

With regard to the selection of the sites, some respondents criticise the selection from the list of omission sites. However, the Inspectors had no choice but to assess all of the objections to the Plan, including the omission sites and, if they felt a need to allocate additional land, to decide whether this could be done by facilitating more Urban Capacity or windfall development or allocating new sites. Given their concerns about over-reliance on windfall sites it is not surprising that

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Association (331/4)

It is inappropriate to designate Local Reserve Sites when the latest H4 Monitoring Report indicated surplus provision in the county. This should easily cover any District shortfall without resorting to unnecessary incursions into greenfield land. The choice of Local Reserve Sites also has major deficiencies (see comments under representations 331/5 and 331/6).

they identified new sites. This process does, however, follow the sequential approach and it is likely that the Council would have adopted a similar approach if it had felt a need to identify additional housing provision. The fact that the sites are held in reserve will ensure that brownfield sites can be used if available and the potential for Urban Capacity or windfall sites can be assessed when considering whether to release the reserve. The fact that there is a variety of sites, in terms of size and location, is more likely to be an advantage than a problem as it gives scope for sites to be chosen taking account of the nature of any shortfall which they are seeking to address.

Change sought – delete named reserve sites

The Inspector identified the four sites for their sustainability merits but did not prioritise their release. The mechanism for prioritising the release of the sites is set out in the Local Reserve Sites Policy SPD. The Council has identified lead time as the most important consideration for the release of the sites should a shortfall in the district baseline housing provision be identified. Whether any particular site would be released first would depend on whether it best met the release criteria of the SPD.

Bovis Homes (205/2), Heron Land Developments Ltd. (2497/2)

The approach undermines the provisions of Structure Plan Policy H4, as it proposes a dispersed strategy. The site at Winchester City (North) is inherently more sustainable than the sites at Denmead or New Alresford, and more capable of supporting physical and social infrastructure than the sites at Pitt Manor or Worthy Road. None of these sites would be capable of delivering the anticipated shortfall of provision on their own. A phased release of land at Winchester City (North) would allow a more flexible approach, accord with PPG 3, and provide a significant opportunity to deliver affordable housing.

Subsequent sections set out a detailed response to the issues raised in respect of each of the proposed Local Reserve Sites. These include points regarding landscape impact, transport, nature conservation, and impact on the setting of Winchester. Where appropriate, specialist advice has been sought and the results included in the response.

Change sought – amend to allow for phased release of Winchester City (North) in lieu of named local reserve sites.

Policy DP.1 of the Local Plan requires a design statement on sensitive sites that appropriately deals with drainage issues. It would be inappropriate to address this issue within the Local Reserve Site supporting text when it is covered elsewhere in the Plan.

Cala Homes (220/4)

Welcome identification of a policy identifying a Local Reserve housing provision, but object to proposed sites identified (see also comment on MOD 2.5). All of the local reserve allocation should be at Winchester, the largest

One respondent (215) suggests that their omission site should be identified as a Local Reserve Site instead of those recommended by the Inspectors at Alresford and Denmead. They suggest that their site at Kings Worthy would be better suited to meet Winchester's problems of in-commuting and lack of affordable housing. However, the merits of the site were considered in detail through the Inquiry process and the Inspectors were in a position to take account of these claimed benefits as part of the process of comparing all the omission sites. Having done this, they recommended those sites which they felt were the most suitable to be identified as Local Reserve Sites. The respondents have not put forward any matters which have not already been considered by the

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settlement, the location for most facilities and the area of greatest affordable housing need. The four local reserve sites should be deleted in favour of allocating part of the reserve MDA at Winchester City (North). It is a highly sustainable location, and the development could be delivered without compromising the allocation of the site as a reserve MDA, which could not be delivered during the Plan period. It would also allow a more focused approach to meeting housing need on a single site. The serious shortfalls in affordable housing in Winchester were recognised in the recent appeal decision for Winchester City (North). 40% provision was agreed as the appropriate provision, which would yield 160 affordable homes in a development of 400 homes.

Change sought – amend to allow for phased release of Winchester City (North) in lieu of named local reserve sites.

Eagle Star (Estates) Ltd (352/4)
Support identification of Local Reserve Sites should additional land need to be released. The release of small sites would provide a more flexible response towards meeting any shortfall in the period to 2011. The long-term requirement for these Local Reserve Sites should be reviewed in the LDF process, when the regional requirements of the South East Plan are known.

Change sought – not specified.

Redrow Homes (Southern) Ltd (474/2)
The Policy should be modified to refer to the sequentially preferable status of identified Local Reserve Sites at Winchester, with Francis Gardens as

Inspectors and there is, therefore, no reason to reject the Inspector's recommended sites in favour of this one.

Need for Local Reserve Sites

As noted in response to representations on MOD 6.11 above, the main reasons why the Inspectors felt a need for Local Reserve Sites are still relevant. It is acknowledged that the latest H4 Monitoring Report indicates that the Structure Plan requirement is likely to be exceeded, but the Strategic Planning Authorities are still recommending that provision should continue to be made for Strategic Reserve Sites. This is because reserve sites (whether Strategic or Local) are measures aimed at addressing potential future shortfalls, not allocations made to meet immediate needs. The City Council's own monitoring reflects the Hampshire-wide situation, suggesting a probable surplus of housing provision. However, this projection does rely on various assumptions about sources of housing supply, which are considered below.

Windfall/Urban Capacity Sites. It is noted in response to representations on MOD 6.11 above that windfall/Urban Capacity sites are inherently difficult to forecast and that the Inspectors were concerned about the reliance on a large number of small sites. This situation remains the same. Even the large scale windfall site at the Police Headquarters in Winchester, which is a very rare large windfall, is by no means certain to be implemented. The Police Authority have concerns about funding relocation and these may be exacerbated now that it is confirmed that Hampshire will not merge with an adjoining Police Authority.

Allocated Sites. These sites tend to have a high level of certainty as to delivery, but are now mostly completed, except for West of Waterlooville (see below). The only allocations remaining to be completed are at Whiteley and Knowle (totalling 280 dwellings) and most sites are likely to be developed in the near future. The only exception is land at Whiteley Green (90 dwellings), owned by Hampshire County Council, which the County Council has no plans to release in the short-term.

West of Waterlooville MDA. At the Local Plan Inquiry the Council argued that at least 1600 of the 2000 dwellings allocated as the baseline provision at West of Waterlooville would be completed by 2011, and that it was possible that all 2000 could be completed in that timescale. In the run-up to the Inquiry, planning applications were expected in summer 2004, with completions beginning in 2006. The current situation is that, at the start of 2006/07 the only planning

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a priority for release if annual monitoring identifies a shortfall in completions to meet the baseline housing requirement.

Change sought – modify policy as requested

Environment Agency (253/4)

For each of the Local Reserve Sites, supporting text should be included to set out the drainage issues that need to be addressed. In accordance with PPS 23, a desk study and preliminary risk assessment should be produced.

Change sought – add supporting text to set out drainage issues on each Local Reserve Site

Denmead Parish Council (2246/1), P Stallard (2534/1)

The concept of Local Reserve Sites was not discussed at the Inquiry, nor the potential to choose one in Denmead. The parish supported the Council's case that none of the sites promoted in Denmead should be developed.

Change sought – delete policy relating to Local Reserve Sites

CPRE (2530/2)

Object to identification of Pitt Manor, Little Frenchies Field and Francis Gardens. Pitt Manor and Francis Gardens are part of the integral landscape setting of Winchester. Little Frenchies Field is greatly valued as a readily accessible open space by the local community. The development of Pitt Manor and Francis Gardens would impact on the local road network. Pitt Manor is a valued ecological site and development at Francis Gardens would adversely affect SSSI and SAC along the River Itchen.

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application to have been submitted is for just under 25% of the site. An application for the majority of the site is expected in Summer 2006. The Annual Monitoring Report anticipates 1600 dwelling completions at West of Waterlooville by 2011, but this is now likely to be the maximum achievable and may need to be reviewed given the delays in planning applications being submitted. Indeed, the Strategic Planning Authorities' H4 Monitoring Report makes an allowance of only 1,110 dwelling completions at West of Waterlooville by 2011.

It is clear that, whilst there have been relatively high levels of completions over recent years, there remains significant uncertainty over whether this can be maintained, especially as West of Waterlooville would need to take over from Whiteley and Knowle in contributing large dwelling completions on allocated land. Although monitoring by the Strategic Planning Authorities and the City Council suggests that strategic and District housing requirements are achievable and currently seem likely to be met, the factors which led the Inspectors to seek a greater level of certainty still remain.

The City Council has a responsibility to ensure that the Structure Plan housing requirement for the District is met. The Strategic Planning Authorities, the Inspectors and the Government Office are clear that the requirement to provide 7295 dwellings between 1996 and 2011 is imperative, even if it is no longer likely that 2000 of those dwellings will be provided at West of Waterlooville by 2011. The difficulties in achieving adequate development at Waterlooville do not, therefore, excuse the Council from meeting its full housing requirement, or from the consequences of not doing so. In practice, development elsewhere in the District is likely to compensate for at least part of the Waterlooville allocation. The issue is not, therefore, about whether other parts of the District should 'over-provide' housing, as they are already doing so, but of the scale of over-provision that may be needed.

Notwithstanding that the land at Barton Farm is a strategic reserve site, it is extremely unlikely that all of this site will be required, or would be capable of being developed during the Plan period, should the H4 monitoring process identify a compelling justification for its release. Respondents have therefore suggested that part of this site should be re-allocated as a local reserve site. However in practice this would raise two fundamental difficulties. Firstly the Structure Plan is unambiguous in requiring the Council to identify a strategic reserve site of 2,000 dwellings at Winchester City (north), and to re-allocate part of this site as a local reserve to

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Change sought – consider alternative brownfield locations to meet any identified shortfall

P J & S K Morgan (2532/2)

The choice of reserve sites is unconvincing, and no study has been undertaken to explain why the sites were chosen. There is a serious imbalance in the size of sites chosen.

Change sought – not specified.

J A Hurrell (2498/1)

The Local Reserve Sites should not be accepted as the H4 Monitoring Reports show that there is no need to trigger the reserve MDAs. The Inspector who determined the recent Winchester City (North) appeal cited this as a key reason for dismissal.

Change sought – delete Local Reserve Sites

G M Weyndling (2499/1)

Object to additional development on the Local Reserve Sites at Winchester, as it would destroy the City's character and make it less attractive to tourists. It would also exacerbate the traffic problems in the centre. The boundaries of the City should not be extended as the easy access to the countryside are an essential part of its character. Question whether the impact on water supply problems has been considered.

Change sought – delete Local Reserve Sites at Winchester

J N Abram (2536/1)

Object to principle of Local Reserve Sites. Small individual greenfield sites in rural areas should not be sacrificed to meet the needs of target

meet any future deficiencies in the baseline provision would either mean that the balance would need to be identified elsewhere or the Plan would risk being out of conformity with the Structure Plan. Secondly, while it would be possible to split Barton Farm into two parcels of land, e.g. divided by the prominent ridge running east-west towards the middle of the site, if a local reserve were to be allocated on Barton Farm, then logically it would have to be to the south of the ridge, as the land to the north is isolated farmland. This land is defined by the Andover Road to the west, the ridge to the north and the railway line to the east, and there are no defining features that would sensibly subdivide this land further. The southern part of the Barton Farm site is approximately 40 hectares and is capable of accommodating at least 1,000 dwellings which is far in excess of any potential shortfall in the baseline housing provision and far in excess of the requirement for local reserve sites identified by the Inspector.

The difficulty of bringing forward only part of Barton Farm for development to meet any shortfall in the baseline housing provision was recognised by the Inspectors who concluded that 'it would be inappropriate for release as a solution to the shortfall because the large scale and long lead times would not address the smaller and essentially short term deficiencies in urban capacity'. (Inspector's Report, para.6.5.14). This option was, therefore, considered by the Inspector and rejected.

Policy Wording

With regard to the content of the proposed Policy and explanatory text, the Inspectors recommended "the inclusion of an additional policy and text identifying the following Local Reserve Sites", not just the inclusion of a table of sites. The Inspectors clearly envisaged the Council drafting the content of the Policy and text, which it has done. It is, therefore, correct for the proposed modifications to show the Reason/Source for the Modification as the Inspectors' recommendation.

The reference to 'related development' reflects the fact that uses other than housing were proposed by the Inspectors on parts of the Pitt Manor and Francis Gardens sites. Parts of these sites were proposed for retention as open land in recognition of their nature conservation and/or landscape importance. Also, there is potential for the Pitt Manor site to include Park and Ride. Failure to indicate this (as suggested in the respondent's revised wording) would imply that the whole of these sites could be developed for housing, which

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figures for MDAs and compensate for delays. Identification of Local Reserve Sites is in conflict with the sequential approach that needs to be followed before any greenfield site is released. The concept is also unsound as it raises developers' expectations and excludes the community from involvement. The allocation of Local Reserve Sites should not be derived from omission sites, as there has been no opportunity for community consultation. The Local Reserve Sites should be deleted as it is premature to include them in advance of the adopted Supplementary Planning Documents.

Change sought – delete Local Reserve Sites

Westbury Homes (Holdings) Ltd (215/1)

Object to the proposed allocation of Little Frenchies Field, Denmead, and Spring Gardens, New Alresford, as Local Reserve Sites. Sites closer to Winchester, namely land at Lovedon Lane, Kings Worthy, should be allocated instead, as it is better able to reduce in-commuting to Winchester and the use of the private car. It is also better able to address the lack of affordable housing in Winchester, recently acknowledged as of significant weight by the Winchester City (North) appeal Inspector.

Change sought – delete Little Frenchies Field, Denmead, and Spring Gardens, New Alresford, as Local Reserve Sites. Include land at Lovedon Lane, Kings Worthy instead.

Recommended Response to Representation

Recommended Change

would not be appropriate and was not what the Inspectors intended. The proposed new paragraph at MOD 6.16 explains the need to take account of the Inspectors' site-specific conclusions, including the limitations on the area of some sites that is suitable for development.

The wording of the proposed new Policy (MOD 6.12) already refers to windfall sites (end of 3rd paragraph). Respondents 138 and 2355 suggested re-wording refers to monitoring of whether sites identified in the Plan or Urban Capacity Study come forward and/or deliver less dwellings than anticipated at the expected time. However, this implies a rather complex test for the release of the Local Reserve Sites when there is only one basic requirement: to meet the Structure Plan baseline housing requirement for the District. So long as this is achieved, it is largely irrelevant whether the sites are from the various sources originally anticipated in the Plan, and there is no need to consider whether a particular source of housing will deliver the right number of houses at the right time. It is sufficient for the Policy and explanatory text to indicate that there will be monitoring of whether the baseline requirement will be met from the range of sources that may contribute and, if not, that one or more of the Local Reserve Sites will need to be released. Any additional detail that is needed is provided by the Supplementary Planning Document on the subject.

With regard to the sequence of site release, the Inspectors identified the four sites for their sustainability merits but did not prioritise their release. The mechanism for prioritising the release of the sites is set out in the the Local Reserve Sites Policy SPD, taking account of comments made by the Inspectors. The Council has identified lead time as the most important consideration for the release of the sites, should a shortfall in the district baseline housing provision be identified. The site or sites which would be released first would be those that best met the release criteria of the SPD and it would not be appropriate to pre-judge this by prioritising the sites in the Local Plan or the SPD.

With regard to the Environment Agency's comment on drainage issues, Policy DP.1 of the Local Plan requires a design statement on sensitive sites that appropriately deals with drainage issues. It would be inappropriate and repetitive to address this detailed issue within the Local Reserve Site supporting text when it is covered elsewhere in the Plan.

Conclusion

To conclude in relation to the principle of identifying Local

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Reserve Sites, it is considered that the representations made do not raise any new issues of significance which would warrant rejecting the Inspectors' recommendations. Local Reserve Sites may be a new name for allocations in Winchester District but the approach recommended by the Inspectors is entirely consistent with the 'plan, monitor and manage' policy which has been promoted in Government advice for 5 years. By holding back the release of greenfield development unless absolutely necessary and by choosing the most sustainable sites from those promoted through the Local Plan process, the Inspectors have also followed the sequential approach.

The Inspectors did not say that housing provision would definitely be in shortfall, or that it is currently in shortfall, and it is therefore desirable that they should recommend a reserve site policy rather than 'full' allocations. They did, however, have concerns about whether housing supply would definitely meet Structure Plan requirements and the reasons for those concerns are still apparent. It is not, therefore, possible to say with certainty that the sites will not be needed during the Plan period and their allocation as reserve sites will serve to protect them unless and until they are needed, and to protect the rest of the District from the uncertainty that would be caused by failure to have a means of dealing with potential housing shortfalls. Such a failure would otherwise be likely to be manifested in unwelcome planning applications and appeals on a potentially large number of sites, of which the recommended Local Reserve Sites would no doubt be amongst the first in any event. Accordingly, it is recommended that the principle of Local Reserve Sites be retained.

Recommended Change:

None.

Site-Specific Matters

Worthy Road / Francis Gardens, Winchester

Representations:

- **Objections:**

**D Greenwood (230/1), Winchester
City Residents' Association (331/5),
D Farley (336/1), M Tombs (1007/1),**

Site-Specific Matters

Worthy Road / Francis Gardens, Winchester

A number of respondents have objected to the potential development of the site, without putting forward reasons for their objection, but the majority have advanced reasons on the following issues.

Issues 1 – 8: The Principle and Location of Local Reserve Sites

Issues 1 and 2 are general rather than site-specific issues,

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Mr & Mrs A C Granger (1052/1), Mr & Mrs D Spence (1136), C Wheatear (1170/1), V Bruty (1259/1), G Bruty (1260/1), J Balfour (1294/1), B Taylor (1335/1), S Lye (1337/1), R & J Ford (1338/1), J Raggett (1339/1), B Espiner (1346/1), R F Williams (2341/1), M Johnson (2342/1), E J King (2343/1), B M Adams (2344/1), B Somerville (2345/1), P Forrester (2346/1), M Wright (2347/1), H T Roles (2348/1), M McCullagh (2349/1), T Nugent (2350/1), M J Nugent (2351/1), B A W Padilha (2352/1), G Butcher (2353/1), L Willemse (2367/1), C & D Berry (2368/1), A Helliwell (2369/1), E R Allen (2370/1), T Saville (2371/1), R C Long (2375/1), D L Clements (2376/1), B M Adams (2377/1), J F Whittaker (2378/1), E Shergold (2379/1), J Rabbitts (2412/1), D G Rees (2413/1), R M King (2414/1), S R J Penn (2415/1), J Dixon (2416/1), C G King (2417/1), L & C King (2418/1), L Atkin (2419/1), D M Bostock (2420/1), A Massey (2421/1), T Keale (2422/1), E & P Wadham (2426/1), A Hadlington (2427/1), J Powell (2428/1), P Gilbert (2429/1), K J Honey (2430/1), P P Bogan (2431/1), M Bruce & S Bohnacker-Bruce (2432/1), L D & E B Galloway (2433/1), G Branston (2434/1), Hampshire & IOW Wildlife Trust (2475/3), C Hodgson (2491/1), G Jackson (2492/1), G & A Cox (2493/1), R Allington (2494/1), G M Wandling (2499/3), D Jones (2502/1), N di Gleria (2513/1), S J Skilton (2514/1), N M Richards (2515/1), M & P Gilbert (2516/1) (69 objections)

Object / object strongly to the designation of land adjacent to Francis Gardens as a Local Reserve Site, and are opposed to the

questioning the need for any of the Local Reserve Sites, not just the Worthy Road / Francis Gardens site. The issues raised have already been fully addressed in the sections of this response above. Respondents should therefore refer to these sections for a full response to these issues.

In Issue 3, some respondents consider that MOD land should be an alternative to this Local Reserve Site, and although there is no known date for the release of sites, it should not be a valid reason for rejecting them. In accordance with Government policy in Planning Policy Statement 1: Delivering Sustainable Development, the planning system is expected to provide certainty. The Inspectors concluded that MOD land could not provide an alternative to the Strategic Reserve Major Development Area at Winchester City (North), in view of the uncertainties about the release of the land, and the likelihood that none would be available before the end of the Plan period. This would apply also if any MOD land was considered as an alternative to a Local Reserve Site, and therefore similarly MOD land could not be considered in lieu. If, however, MOD sites did become available and there was certainty that they would be developed, they could be taken into account in deciding whether the release of Local Reserve Sites was necessary.

In Issue 4, some respondents suggest that the southern part of Barton Farm and two sites off Courtenay Road should be considered as Local Reserve Sites. The General response above explains that the Strategic and Local Reserve Sites are included in the Plan to respond to different housing requirements and monitoring mechanisms, and therefore they are not interchangeable. They therefore need to be considered separately. Part of the land adjacent to Courtenay Road is allocated for recreational use to meet the shortfall of such land already existing in the District. If the reserve MDA is triggered at Winchester City (North), there may also be a need for this area to be extended to provide recreational uses for the MDA. These areas are therefore not available as an alternative to the Local Reserve Sites.

In Issue 5, a respondent suggests that the Local Reserve Sites should include the sites put forward under Issue 4, together with the Worthy Road / Francis Gardens site, as they could share a cycle track and together better meet the Plan's sustainability criteria. Accessibility by different modes of transport is one of the aspects that need to be assessed in determining a site's sustainability, but the potential to improve one aspect of accessibility by the provision of a cycleway, would not be a reason on its own to promote specific areas for

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development of the site.

The following have highlighted these reasons:

- **Issue 1:** The land is not needed for development as the Council's Annual Monitoring Report shows that the Structure Plan's housing requirement is likely to be met **(1259/1), (1260/1), (2502/2)**
- **Issue 2:** It is a greenfield site and it is Government and County Council policy that brownfield sites should be used first **(1260/1), (2430/1), (2493/1), (2502/2)**
- **Issue 3:** If additional land is needed, consideration should be given to MOD sites. The fact that there is no known date for their release is not a valid reason for rejecting them **(1260/1), (2493/1)**
- **Issue 4:** The southern part of Barton Farm / and two sites off Courtenay Road should be considered as Local Reserve Sites **(2426/1), (2514/1)**
- **Issue 5:** If four Local Reserve Sites are proposed in this area, including Francis Gardens, they could share a cycle track and together better meet the sustainability criteria **(2514/1)**
- **Issue 6:** Development here would encourage development on the fringes / the arguments put forward against development at Barton Farm, which has been rejected, also apply to this site **(1260/1), (1294/1), (2431/1), (2493/1)**
- **Issue 7:** Other suitable land is available for building in the area eg Greenacres School / all possible infill sites must be

development. The Inquiry Inspectors have recommended Local Reserve Sites adjacent to three of the District's most sustainable settlements, and this would be consistent with the Local Plan's strategy of concentrating development in such settlements. The Council has therefore accepted the Inspectors' recommendations to include these sites as Local Reserve Sites.

Under Issue 6, several respondents are concerned that development here would extend the boundaries of the City and two of the respondents consider that it would create 'ribbon development', should the development take place. In recommending the Worthy Road / Francis Gardens site as a Local Reserve Site, the Inquiry Inspectors have taken full account of the sequential approach in PPG 3, which needs to be followed in identifying sites for development or reserved for development if required. They have therefore recommended 'urban extension' sites in edge of settlement locations, as reserve sites, which correctly follows the search sequence in PPG 3.

Should the site need to be developed in the future, it certainly would not create ribbon development, which is development along a road frontage, as it would need to be an in-depth development to achieve the number of proposed dwellings and reflect the character of adjacent development. One respondent considers that the policy would encourage the sort of development on the fringes that has already been dismissed at Barton Farm. The Worthy Road / Francis Gardens site would form part of the Local Reserve provision and therefore cannot be directly compared with the Winchester City (North) MDA, which forms part of the Strategic Reserve provision and is of a much larger scale. The need for their release would be judged against different criteria, and therefore the conclusions reached by the Inspector who determined the Winchester City (North) appeal cannot be applied to the Worthy Road / Francis Gardens site. The Local Plan Inquiry Inspectors, however, reached their conclusions using all the information available to them on the Local Plan's strategy, and therefore their conclusions are, therefore, most relevant.

Under Issues 7 and 8, respondents have commented on the availability of other sites for development in the locality, or alternatively do not wish to see other sites developed in the locality. As set out above, the Plan's strategy has been prepared to accord with the search sequence in paragraph 29 of PPG 3, and therefore allows first for the development of previously developed land on appropriate sites within the

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<p>built on before greenfield sites are considered (1052/1), (1259/1), (1294/1), (2371/1), (2502/2)</p> <ul style="list-style-type: none">• Issue 8: Oppose development elsewhere in Abbots Barton (2367/1), (2379/1)• Issue 9: The land is in the Local Gap / Green Belt between Winchester and Kings Worthy. The development would have a significant impact on the landscape and should not be built on (331/5), (1052/1), (1259/1), (1294/1), (2341/1), (2426/1), (2430/1), (2432/1), (2499/3), (2513/1), (2514/1), (2516/1)• Issue 10: The area borders onto the floodplain of the River Itchen / is immediately adjacent to the River Itchen SAC and SSSI and should be protected from development (2426/1), (2475/3), (2513/1)• Issue 11: Development would destroy wildlife habitats (2516/1)• Issue 12: If the site is retained, appropriate environmental assessments should be carried out (2475/3)• Issue 13: Oppose development in the vicinity of the Abbots Barton Rest Home (336/1), (2515/1)• Issue 14: There is little likelihood of the houses being affordable (1259/1)• Issue 15: Development of the site would result in loss of privacy and other impacts for adjoining properties (2514/1)• Issue 16: It would create additional pressure on existing recreational space	<p>developed area of Winchester. Such development could not reasonably be prevented, as suggested by some respondents, as the development of such sites would be the preferred option, and there is no mechanism for withholding the development of such sites where they meet the normal criteria for development.</p> <p><u>Issue 9: Local Gap and Landscape Considerations</u> A number of respondents are concerned about the extension of development into the countryside, and, in particular, the erosion of the defined Gap between Winchester and Kings Worthy / Headbourne Worthy.</p> <p>Some respondents are confused about the actual Gap status or the landscape designations that apply in the Local Plan Review. The land is not Green Belt, and, although it was a Strategic Gap in the earlier Winchester District Local Plan, its status has now changed to that of a Local Gap, to reflect the changes in Gap policy in the County Structure Plan Review that provides the background to this Local Plan. In a similar way, the Areas of Special Landscape Quality have not been carried forward as landscape designations from the Winchester District Local Plan to the Local Plan Review. The Government now expects local authorities to carry out district-wide Landscape Character Assessments, setting out the important features of each type of landscape to be protected. A District Landscape Character Assessment has already been carried out and adopted as Supplementary Planning Guidance.</p> <p>The Council presented a full landscape case to the Inspector as to why the site should not be developed, based largely on its landscape character and visibility issues. The land is within the Upper Itchen Valley landscape character area within the District Landscape Character Assessment, but the objector who presented the case at the Local Plan Inquiry argued that the rural character of the landscape and the setting of Winchester could be conserved if the site were developed, by developing only the western part of the site. The Inspector accepted this, and also that there was “ample opportunity for landscape screening on the eastern part of the site”. He therefore concluded in his Report that the site “accommodates development within the existing landscape framework as well as any scheme reasonably could”.</p> <p>The Council also presented detailed evidence as to why the extent of the Local Gap should not be reduced, and this was substantially based on detailed landscape evidence. The evidence referred to the review of all the former Strategic</p>
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- (1259/1)
- **Issue 17:** The road infrastructure is already stretched. The proposed access through Francis Gardens / use of Dyson Drive and Russell Road would cause disruption / conflict (336/1), (1260/1), (1259/1), (2341/1), (2368/1), (2429/1), (2430/1), (2431/1), (2432/1), (2493/1), (2499/3), (2502/1), (2514/1), (2516/1)
 - **Issue 18:** Pollution levels would increase at a time when the Council is endeavouring to reduce car usage in town (2493/1)
 - **Issue 19:** Concern that there was no consultation with local people (1052/1)
 - **Issue 20:** Question value of including residents in this consultation (1007/1)

Change sought – delete land at Worthy Road / Francis Gardens, Winchester, as a Local Reserve Site

Gaps and other areas for consideration as Local Gaps against a set of common criteria as part of the Local Plan Review process. As a result of this process, the Winchester – Kings Worthy / Headbourne Worthy Local Gap was retained with the same boundary as the earlier Strategic Gap. The Inquiry Inspector was aware of this background, and the conclusions of the previous Local Plan Inquiry Inspector about the site. He had concluded that the site made an important contribution to the then Strategic Gap, and that it was an essential part of the Local Plan's strategy that this land should remain open. The Inspector for the Local Plan Review nevertheless concluded that he was judging the issue against different circumstances, including a different Local Plan strategy, level of housing need and changes to the application of PPG 3. He accepted the need for this Local Gap, and therefore the possible future loss of any part of it would need to have regard to the Gap concept and the criteria for defining Gaps. He believed that some development, if required, could be accommodated without harming that concept, particularly as there was no intervisibility between the site and Headbourne Worthy.

Issues 10 – 12: Nature Conservation Issues

One respondent is concerned about the general loss of wildlife habitats if the site were developed, and three other respondents are concerned about the site's proximity to the River Itchen 'Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). In view of this, respondent 2475 considers that, in accordance with European legislation, an 'Appropriate Assessment' should be carried out.

Prior to the Inquiry, the Hampshire Biodiversity information Centre was consulted on the ecological importance of all the 'omission' sites. At that time this site was not considered to be of nature conservation interest, but, as a result of the concerns raised above and the new requirement for Appropriate Assessment under the Habitats Regulations which is coming into force on 1 September 2006, English Nature and the County Council's Biodiversity Information Centre have been consulted on the issue.

The County Council's Biodiversity Information Centre has re-surveyed the site and also advised that, as the site immediately borders the River Itchen Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC), the proposed development may need an Appropriate Assessment to determine the impact on the SAC. They advised that the buffer tree belt area in the central part of the site may provide some mitigation, and therefore a survey of this feature and (species-rich) hedgerows has been undertaken. This has

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shown very little of ecological interest except for the mature trees along the western boundary of the site, which may provide good roost sites for bats. However, the survey found no signs of bats roosts or of badger activity in the vicinity of the field or woodland areas.

In response to the Council's consultation, English Nature is concerned about the proximity of the site to the River Itchen SSSI and SAC, and potential negative effect that development would have on the designated areas. They point to recent Government advice which strongly suggests that "Appropriate Assessments" are carried out, even though this is not yet a formal requirement under the Habitats Regulations. They suggest that an Appropriate Assessment would help the Council to ensure that its responsibilities were met, namely to avoid development that would have a significant effect on the SAC.

Government advice is that, where it is intended to adopt a Plan before the Habitats Regulations are adopted (in September 2006) transitional arrangements should be followed. In these, an appropriate assessment should still be carried out, unless a decision not to do so can be justified with evidence. English Nature also advises that, if the site remains in the Local Plan, any future planning applications should be a full application, accompanied by an assessment of whether the development is likely to have a significant effect on the SAC, and an appropriate assessment if necessary. This is in addition to a full ecological appraisal to identify and address any issues relating to the SSSI.

Officers have considered the above advice and concluded that an Appropriate Assessment should be undertaken. This Assessment is appended to the Cabinet covering report (Appendix 2). The Assessment considers the issues raised by English Nature in its letter and concludes that the allocation of the site is not likely to have a significant adverse effect on the SAC. In addition, the allocation of the site in the Local Plan, especially as a Local Reserve Site, does not commit the Council to granting permission for its development. Any future planning application would need to satisfy all relevant policies and criteria of the Plan, which would not only include those relating to the release of reserve sites, but also those relating to nature conservation, flooding, sustainable development, pollution and other relevant issues. This gives the Council a further opportunity to ensure that its responsibilities towards a site of international importance such as the SAC are met.

If there are doubts as to the impact of development, this is a

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factor which could influence the 'deliverability' of housing on the site and which could, therefore, affect whether it is triggered. This should encourage any prospective developer to address the important ecological issues at an early stage.

However, in order to ensure that the Council has adequately highlighted the importance of the Plan's other policies, it is recommended that MOD 6.16 (new paragraph following MOD 6.15) should be amended by the addition of the following explanatory text:

MOD 6.16 "The Inspector's report includes a number of site-specific conclusions which he reached relating to the development of the sites. Developers will need to take account of these in any planning brief or design statement that they submit to accompany planning applications. They will also need to take account of, and comply with, other relevant policies in the Plan that may apply to Local Reserve Sites, in particular those relating to nature conservation, flood risk, sustainable development and pollution, and other policies relevant to a particular reserve site. The Inspector highlighted the suitability of the Pitt Manor, Winchester site for a park and ride scheme on about 1 hectare of land. The need for such provision will be reviewed if and when the site is released and provision should be made if a need exists. If park and ride provision is not required the estimated site capacity is likely to increase by 30-50 dwellings."

This alerts potential applicants to the issues and to other Local Plan policies which already exist. As such it does not materially affect the content of the Plan and is therefore a change which can be made without putting forward further Proposed Modifications.

Issues 13 - 16: Local considerations

Some respondents oppose development because they consider it would cause disturbance to residents of the Abbots Barton Rest Home. Another respondent considers that the development of the site would result in loss of privacy for his property which borders the southern boundary of the proposed development, and which was specifically located at low level to preserve the views from the countryside. These are local considerations that will need to be taken into account at the detailed design stage, as any scheme would need to meet the Plan's normal planning criteria.

Many local residents had written to the Inspector prior to the Inquiry expressing their concerns and the Inspector was, therefore, able to take into account the effect of development

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on existing residents. The Inspector concluded that development of the site need not have an adverse effect on residents, provided normal safeguards were taken, and this is not therefore a reason for resisting development of the site in principle, should it be needed.

Another respondent is concerned that the development of the site would create additional pressure on existing recreational facilities. This is not the case, as, should the development be required, it would need to make provision for recreational space in accordance with the full Local Plan standard, as is the case for all new housing developments in the District. Some recreational space, normally children's play facilities and general informal space, could be provided on-site, but it is likely that the required provision of sports grounds would be met by improvements to existing facilities nearby. This would be achieved through the operation of Policy RT.3 and the Council's Open Space Funding System. The development would therefore need to make sufficient provision to ensure that there was no additional pressure on existing facilities. It is not, therefore, a reason for resisting the development of the site, should it be needed.

Issues 17 – 18: Access and car usage

A substantial number of respondents are concerned about the possibility of access through Francis Gardens and potential traffic conflict in the local area, and the general impact on Winchester's road infrastructure, which they consider is already stretched. One respondent is also concerned about the additional car journeys that would be generated, when the Council is endeavouring to reduce car usage in town. In view of the number of concerns, the Highway Authority has been consulted again, and their views have been integrated into this response.

The Inspector considered that the site's location on the north eastern edge of the City boundary and its easy access to bus routes and an existing cycle route gave it an advantage over many omission sites in terms of accessibility to facilities and a range of employment opportunities. Three options for access to the site were considered at the Inquiry – Option 1 from Worthy Road, Option 2 from Francis Gardens and Option 3 a combination of the two options. Option 1 was not considered favourably, in view of the need to breach the existing continuous flint wall along Worthy Road, and the Highway Authority has also confirmed that the distance proposed for the visibility splay onto Worthy Road would not be acceptable. In his consideration of the potential means of access, the Inspector was aware of the concerns of the previous Local

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Plan Inspector, but concluded that Option 2 - access through Francis Gardens - would be the best option, possibly with an emergency access onto Worthy Road. He did, however, consider that it would be essential for any scheme to minimise the loss of visual amenity, saying that “the actual need for such an access would have to be weighed in the balance of considerations in respect of any particular proposal”. The Highway Authority has confirmed that Options 2 and 3 might be feasible, but that a Transport Assessment would be necessary to demonstrate how the site could be safely and conveniently accessed by all modes of transport.

The fears of respondents are therefore substantially unfounded. Any developer would have to undertake a Transport Assessment to demonstrate that the proposed means of access minimises the impact on the surrounding road infrastructure, and increases opportunities for using modes of transport other than the car.

Issues 19 and 20: Consultation with local people

Respondents 1007 and 1052 are concerned that there has been insufficient consultation with local people on the designation of the site as a Local Reserve Site. The Inquiry process allows Inspectors to make such recommendations, for either full or reserve allocations, where they feel it is necessary to make a Plan more robust, and local people had the opportunity to influence the Inspectors at the time of the Inquiry. A full explanation of why the Inquiry Inspectors felt it necessary to recommend the designation of Local Reserve Sites is set out in the response above.

Conclusion

It has been concluded that the representations on the Worthy Road / Francis Gardens site have not raised any new issues of significance which would warrant rejecting the Inspectors’ recommendations.

Although the representations on nature conservation issues were the subject of further consultation with the County Council’s Biodiversity Information Centre and English Nature, and this resulted in an Appropriate Assessment being undertaken, this shows that the allocation of the site would not have a significant effect on the SAC. In order to ensure that all relevant issues are addressed in relation to this site and the other Local Reserve Sites, the inclusion of additional text in the Plan is recommended to clarify all of the developers’ responsibilities. This would not materially affect the content of the Plan and is therefore a change which can be made without putting forward further Proposed Modifications.

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Little Frenchies Field, Denmead

Little Frenchies Field, Denmead

Representations:

The support is noted.

- **Support**

J Hayter (138/17)

In response to the claims that this site should have been allocated as public open space, it was not listed in the 04/05 Open Space Strategy, which reflects an annual input from the Parish Council. The new sites identified are at Goodman Fields and Anthill Common. Both these sites are allocated in the Plan under Policy RT.4, but not Little Frenchies Field. No objection to the Plan's allocation was received from anyone.

A number of respondents have objected to the potential development of this site, without putting forward specific reasons for their objection, but the majority have advanced reasons centred on the following issues.

Issues 1 – 2: The need for and location of Local Reserve Sites.

Issues 1 and 2 are general, rather than site specific issues and question not only the need for this and other Local Reserve Sites, but also the need for any Local Reserve provision at Denmead, given the size and proximity of the West of Waterlooville Major Development Area allocations. The West of Waterlooville MDA is a strategic housing allocation to meet the needs of an area much wider than Denmead. Housing allocations are not made on the basis of a 'fair share' of development but of the most sustainable and suitable locations and sites. The other issues raised here have already been fully addressed in the introductory 'General' section of this response. Respondents should, therefore, refer to that section for a detailed response on these issues

- **Objections:**

E Goodman (1091/1), A Beeston & S Harding (2018/1), Denmead Parish Council (2246/2), P A & A J Mason (2293/1), M Archibald (2358/1), K S Markham (2359/1), R B Dawe (2360/1), M Jolliffe (2361/1), E J Doe (2362/1), A Grimes (2363/1), S Lamont (2364/1), B D Martin (2365/1), AJ Sawyer (2366/1), P Cullingham (2372/1), R F Poulter (2373/1), D & R Michell (2374/1), Y Thatcher (2380/1), G A Wheeler (2381/1), P N Evans (2382/1), T H & E I R Stringer (2383/1), R Lamont (2384/1), E Gunston (2386/1), K Wilde (2387/1), S Dole (2388/1), W I Megarry (2389/1), R A Megarry (2390/1), R Martin (2391/1), M Martin (2392/1), A May (2393/1), C I Holland (2394/1), C J A Withers (2395/1), P & A Bryant (2396/1), M Stuart (2397/1), R Bainbridge (2398/1), P Rothery (2399/1), C M Tee (2400/1), D K Phillips (2401/1), P R & V A Vinall (2402/1), M Walkington (2403/1), A Gould

Issue 3: Site selection

Respondent 2362 has commented on the availability of alternative sites for development in the locality. In recommending the Little Frenchies Field site as a Local Reserve Site, the Inquiry Inspector has taken into account the search sequence set out in PPG 3. This sequence needs to be followed in identifying sites, either for direct development allocation, or to be reserved for possible development at some later date, if that is required.

Consequently, the Inspectors have recommended four sites, in edge of settlement locations, as reserve sites. This approach correctly follows the sequential method advocated in PPG 3 and, furthermore, the conclusions reached by the Inspectors, having followed that search sequence, incorporate the most up-to-date information available to them on the Local Plan's strategy.

Issue 4: Consequent development pressures

It is unavoidable that the identification of Little Frenchies Field as a Local Reserve Site would make its future development more likely. Although the purpose of the allocation is to

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(2404/1), L K Caress (2405/1), M Parker (2406/1), N R Parker (2407/1), D Massie (2408/1), N E Vernon-Harcourt ((2409/1), J Kerr (2410/1), S Kerr (2411/1), J E Williams (2423/1), J Hughes (2435/1), J R Nobes (2436/1), E L Holland (2437/1), B R Wadham (2438/1), J Wadham (2439/1), S Ranger (2440/1), W Robertson (2441/1), D Tannock (2442/1), P Besley (2443/1), P Fisher (2444/1), Mr & Mrs D Tongs (2445/1), K E Gill (2446/1), Mr & Mrs D J Lancaster (2447/1), A A J Boswell (2448/1), N L Cleverly (2449/1), Mr & Mrs A Smith (2450/1), Mr & Mrs M Goodman (2451/1), V A Day (2452/1), J L Day (2453/1), A M Huckin (2454/1), D V Dawe (2455/1), P H Huckin (2456/1), M Webb (2457/1), J M Partridge (2458/1), D Williamson (2459/1), M Dennis (2460/1), J Herwig (2461/1), D Cooper (2462/1), B Tapuska (2463/1), J H Bailey (2464/1), C M Bailey (2465/1), F Allgood (2466/1), G W Evans (2467/1), Denmead Village Association (2468/1), Mr & Mrs B G Hyett (2476/1), K & D Kirby (2477/1), E Rogers (2478/1), W J Bingham (2479/1), J R Lovejoy-Brinkman (2480/1), P Johnstone (2481/1), L Johnstone (2482/1), P Lehmann (2483/1), P J Knight (2484/1), N Johnstone (2485/1), M Raffle (2486/1), A C McElean (2487/1), D Knight (2488/1), C & C Parnell (2489/1), C Nightingale (2490/1), M C White (2503/1), C Finan (2504/1), G Barge (2505/1), J Budden (2506/1), E A Youngman (2507/1), B C Youngman (2508/1), C Sparrow (2509/1), R Wilson (2510/1), A Mitchell (2511/1), S C & T A Such (2512/1), P Stallard (2534/2), J N Abram (2536/2), L A Clare (2538/1)
(110 objections)

provide for development, if this is needed, the fact remains that the site has been identified in the Inspector's Report and this cannot now be erased. Reserve Site status will, therefore, control whether and when the site is released. However, it will be possible, through future Local Development Documents, to review whether such an allocation should be retained.

There is, however, no reason to assume that identification or development of the Little Frenchies Field site will inevitably lead to further development along the northern or north-eastern boundaries of the village. The Inquiry Inspector made it clear in his report that one of the key features of the site is its visual and physical containment by strong existing boundaries.

Other land to the north is of a different character, is very much part of the rural setting of Denmead and, furthermore, is separated from the settlement by the strong linear feature of the B2150 Hambledon Road. Development of Little Frenchies Field would not, therefore, set a precedent for its additional release.

Issue 5: Infrastructure

A number of respondents are concerned that development of this site would add to the pressure on roads and other elements of the local infrastructure. From this they also suggest that additional housing development at this location would be unsustainable.

The Inspectors have recommended Little Frenchies Field, as one of four Local Reserve Sites, adjacent to settlements considered to be among the most sustainable in the District. With specific regard to this site, and having heard evidence regarding its position relative to the village's services and facilities, the Inquiry Inspector also concluded that 'it is important that Category A [the most sustainable] settlements have sufficient sites available to ensure an adequate supply of housing to meet locally generated need'. Where it can be demonstrated that development would overload existing infrastructure or require new provision, the Local Plan contains policies requiring such provision to be made or enabling development to be resisted. However, the infrastructure providers have not suggested that there are such constraints in respect of this site.

Issues 6 - 7: Local impact

With regard to issues 7 and 8, and the visual and landscape impact of any possible development, the Inquiry Inspector was clearly of the view that the site reads more as part of the

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Object / object strongly to the designation of land at Little Frenchies Field as a Local Reserve Site, and are opposed to the development of the site.

The following have highlighted these reasons:

- Denmead has taken more than its fair share of housebuilding and with up to 3000 houses proposed West of Waterlooville / there is no need for further housing **(1091/1), (2018/1), (2358/1), (2359/1), (2366/1), (2381/1), (2382/1), (2384/1), (2393/1), (2396/1), (2397/1), (2401/1), (2402/1), (2403/1), (2404/1), (2423/1), (2436/1), (2441/1), (2442/1), (2448/1), (2449/1), (2450/1), (2452/1), (2453/1), (2454/1), (2455/1), (2456/1), (2460/1), (2461/1), (2464/1), (2465/1), (2468/1), (2476/1), (2477/1), (2478/1), (2481/1), (2483/1), (2484/1), (2485/1), (2487/1), (2488/1), (2489/1), (2490/1), (2504/1), (2505/1), (2506/1), (2507/1), (2508/1), (2510/1), (2511/1), (2512/1), (2538/1)**
- Question why additional housing is needed here when a large development is proposed at West of Waterlooville **(2476/1)**
- The term “reserve” was not discussed at the public hearing **(2505/1)**
- The public were not aware of the proposal until the decision had been taken **(2481/1),(2485/1)**
- Development here will create pressure for development for the land to the north **(2448/1)**
- If more housing is needed it should be outside the village

settlement than as part of the countryside.

The Inquiry Inspector was also aware that, in relation to the matter of landscape and potential impact, he was adopting a different position to that taken by the previous Local Plan Inspector. He concluded, however, that notwithstanding the current use of Little Frenchies Field and its resulting visual benefit, landscape issues should not override the need to secure a ‘distribution’ of deliverable housing sites that could be accommodated, with suitable mitigation measures, in sustainable locations.

Several respondents oppose this allocation and, therefore, the possibility of future development, because they consider that this would cause disturbance to residents of the Green Meadows Residential Home. This concern is a local consideration which will need to be taken into account at a detailed design stage, given that any scheme would be required to meet the Plan’s normal planning criteria. This particular concern is not, therefore, a sound reason in principle for not developing this site, should that be needed.

Issue 8: Nature conservation issues

A number of respondents are concerned that Little Frenchies Field contains habitat and other natural features of ecological importance. At the time of the Inquiry, the site was not regarded as being of particular nature conservation interest, primarily because the main area of the site has been under arable cultivation, with the site’s north-western corner additionally divided into allotments.

However, as a result of the concerns referred to above, the Hampshire Biodiversity Information Centre has been consulted on this issue. The Information Centre advised that the tree belt along the south-western boundary could contain badger setts and/or bat roosts, as well as the possibility that the field margins were used for foraging purposes. The Centre indicated that a field survey would determine the presence of any such setts or roosts. Consequently, a survey was requested and the results of that have now been received. In terms of on-site ecology, the survey has found ‘very little interest’, apart from the presence of mature trees along the southern and western boundaries. There were ‘no signs of badger activity’ in the vicinity of this boundary tree belt, or in the field itself, and, although the trees were mature enough to offer roosting sites for bats, no signs were noted.

Issues 9 - 12: Allocation for alternative uses

Little Frenchies Field was not included in the 2005/06 Open

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<p>(2362/1)</p> <ul style="list-style-type: none">The space should be retained open as it is integral to the semi-rural / village character (2361/1), (2363/1), (2394/1), (2384/1), (2389/1), (2390/1), (2393/1), (2394/1), (2398/1), (2399/1), (2401/1), (2402/1), (2410/1), (2411/1), (2423/1), (2438/1), (2439/1), (2442/1), (2446/1), (2447/1), (2449/1), (2450/1), (2451/1), (2457/1), (2458/1), (2459/1), (2460/1), (2461/1), (2462/1), (2465/1), (2467/1), (2476/1), (2477/1), (2478/1), (2479/1), (2482/1), (2486/1), (2490/1), (2504/1), (2505/1), (2510/1)The land contains ancient hedgerows, plants and wildlife which are irreplaceable (2406/1), (2407/1), (2410/1), (2411/1), (2423/1), (2444/1), (2450/1), (2468/1), (2478/1), (2481/1), (2485/1), (2490/1), (2504/1), (2505/1)Additional dwellings will impact on the infrastructure / further housing development is not sustainable (1091/1), (2363/1), (2364/1), (2366/1), (2372/1), (2374/1), (2380/1), (2388/1), (2393/1), (2397/1), (2398/1), (2399/1), (2406/1), (2407/1), (2408/1), (2410/1), (2411/1), (2423/1), (2443/1), (2448/1), (2452/1), (2453/1), (2454/1), (2456/1), (2458/1), (2461/1), (2464/1), (2465/1), (2468/1), (2476/1), (2477/1), (2478/1), (2479/1), (2481/1), (2483/1), (2484/1), (2485/1), (2486/1), (2488/1), (2489/1), (2505/1), (2506/1), (2507/1), (2538/1)Denmead is very short of recreational space and this is the only open space close to	<p>Space Strategy, or in any previous version of the Strategy. On the contrary, the two sites identified as being most suitable for improving Denmead's recreational space provision and, in particular, meeting the need for sports pitches were in the Goodman Fields area and at Anthill Common. The Strategy had been prepared in full consultation with all of the District's parish councils and was subsequently adopted by the City Council, with the inclusion of those particular allocations for Denmead. There had been no local objections to the above-named sites through the Local Plan process and no alternative suggestion put forward which particularly highlighted Little Frenchies Field as a superior alternative. The site is not currently used as a public open space, other than the limited allotment use (see below). It is, therefore, neither used nor allocated for open space use. Given the Inspector's comments and recommendations, it is unlikely that an open space allocation could be successfully implemented, even if it were included in the Local Plan.</p> <p>A Village Design Statement for Denmead is currently in the process of being prepared. However, this document, currently in draft form, has not been published for formal consultation or public comment. Consequently, the Design Statement has not reached the stage of being adopted as a Supplementary Planning Document or, indeed, incorporating particular aims or aspirations for further recreational provision in Denmead which have been formally endorsed by the City Council. Supplementary Planning Documents, such as Village Design Statements, must supplement Local Plan policies rather than the other way round.</p> <p>Several respondents suggest that the retention of the small allotment area at the north-western tip of Little Frenchies Field should be a condition of the site's allocation as a Local Reserve Site. To impose such a requirement could well result in unreasonable restrictions being put on any particular design or layout for development, which may need to be brought forward in the future.</p> <p>Nevertheless, the Local Plan does seek to maintain active allotment provision within the District's settlements, as part of its policy to provide and improve local facilities and services. Therefore, should a future development stage be reached, it is reasonable to expect that efforts would be made to retain some allotment area, depending on the needs of the time, either by inclusion within an overall scheme or by relocation to an acceptable alternative site.</p> <p>As an omission site, situated beyond the current policy</p>
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the main recreation ground and suited to complementing its facilities (1091/1), (2246/1) (2293/1), (2358/1), (2359/1), (2360/1), (2361/1), (2363/1), (2364/1), (2365/1), (2366/1), (2372/1), (2373/1), (2374/1), (2381/1), (2383/1), (2384/1), (2386/1), (2387/1), (2389/1), (2390/1), (2391/1), (2392/1), (2393/1), (2396/1), (2398/1), (2400/1), (2404/1), (2406/1), (2407/1), (2408/1), (2409/1), (2435/1), (2436/1), (2437/1), (2440/1), (2442/1), (2447/1), (2448/1), (2451/1), (2452/1), (2453/1), (2454/1), (2455/1), (2456/1), (2459/1), (2460/1), (2462/1), (2463/1), (2464/1), (2465/1), (2466/1), (2468/1), (2476/1), (2481/1), (2482/1), (2483/1), (2485/1), (2486/1), (2488/1), (2489/1), (2506/1), (2507/1), (2508/1), (2510/1), (2246/2), (2534/2)

- The development of the field would be contrary to the emerging Village Design Statement and Parish Plan, that propose the area be used for sports (2466/1)
- The land should retain the allotments (2362/1), (2458/1), (2460/1), (2481/1), (2485/1)
- It would be a good site to replace the Parish Council offices (2435/1), (2454/1), (2456/1),
- The open area gives tranquil protection to Green Meadows Residential Home (2389/1), (2390/1), (2464/1), (2481/1), (2485/1)
-

Change sought – delete land at Little Frenchies Field, Denmead, as a Local Reserve Site

boundary for Denmead, the Inquiry Inspector primarily considered Little Frenchies Field in terms of its potential to provide additional land for housing. However, its status as Countryside in the Plan was also a factor taken into account by the Inspector, in reaching his conclusion.

The recommendation that followed sought to make an exceptional decision, which brought together the future need for additional local housing, with this particular site's characteristics of sustainability, integration with the settlement and accessibility.

To reject the Inspector's recommendation and, instead, promote the use of this land for Parish Council offices would effectively compromise, if not remove, the opportunity to safeguard the site as a Local Reserve site and, as a result, trigger the need to find an alternative housing reserve site, possibly also adjacent to this village.

Conclusion

It has therefore been concluded that the representations on the Little Frenchies Field Local Reserve Site, Denmead, have not raised any new issues of significance which would warrant rejecting the Inspectors' recommendations.

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Pitt Manor, Winchester

Pitt Manor, Winchester

Representations:

- **Objections:**

City of Winchester Trust (1/1), B Smedley (131/1), Winchester City Residents' Association (331/6), R Poole (1125/1), P H Radcliffe (1245/1), M Keen (1288/1), A P Ames (1371/2), M Parker (2469/1), R R Silverthorne (2470/1), R Eynon (2471/1), S Newman (2472/1), P & J Church (2473/1), S Wilson (2474/1), G & S M Barnes (2495/1), D E & G C Allen (2496/1), J A Hurrell (2498/2), G M Wandling (2499/2), S Duck (2500/4), S Duck (2501/4), D Jones (2502/2), O Kelly (2517/1), M & S Carden (2518/1), J Sandison (2519/1), P G & S K Morgan (2532/2) **(25 objections including 863/6 which is qualified support)**

Object / object strongly to the designation of land at Pitt Manor as a Local Reserve Site, and are opposed to the development of the site.

The following have highlighted these reasons:

- **Issue 1:** Ever-continuing growth is not a sane option. Quality of life is more important than quantity **(131/1)**
- **Issue 2:** Insufficient weight has been given to the emerging South East Plan, which excludes Winchester as a growth area. **(1/1)**
- **Issue 3:** Any shortfall of housing provision in Winchester during the Plan period is very unlikely / There is no need for additional housing in view of the large windfall sites that will be available in the near future /

Issues 1 – 8: The Principle and Location of Local Reserve Sites

Several respondents question either the need for development or the need to identify Local Reserve Sites. These matters are dealt with above in response to the General objections to the Local Reserve Sites policy. In relation to Issue 2, the level of growth which must be provided for in the District has been set through the Hampshire County Structure Plan (Review). The Local Plan is required to be in general conformity with the Structure Plan, not the South East Plan. The South East Plan considers a much longer time period and has yet to be adopted. Its development requirements may yet change but are not likely to significantly alter the Structure Plan's requirements for the period to 2011.

In relation to Issues 3 and 4, the housing requirement is a District-wide one and, although the Structure Plan indicates that substantial provision should be made at West of Waterlooville, the District-wide requirement must still be met, even if West of Waterlooville fails to deliver adequate housing within the Structure Plan period. It has been noted above that, whilst it is expected that the Structure Plan requirement will be met, there remains some uncertainty about this. The situation has not, therefore, changed significantly since the Inspector's Report.

Issues 5 – 6 concern the site selection process, which is dealt with above, in response to General objections to the Local Reserve Sites policy. Any exercise to extend the site search process beyond the 'omission' sites considered by the Inspectors would be a very major exercise, resulting in considerable expense, delay and the probable need for a further Local Plan Inquiry. Given that the omission sites are likely to include those which are most suitable for development, there is no certainty that such an exercise would identify different, or better, sites.

The suggestion in Issue 7 that Local Reserve Sites should only be identified if and when a need arises would be contrary to the Plan-led process and is unlikely to enable the identified need to be met. It would simply put off the issue and require a whole range of potential sites to be reassessed, with the disadvantages noted above. Any consultation is likely to raise the same issues and objections, but to a wider range of sites, rather than resulting in any agreement on suitable sites. Because of the length of time that would be taken to identify a site and agree its release, such a process may well be

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<p>The Inspectors reached their conclusions before the most recent Monitoring Report was available (1/1), (1125/1), (1288/1), (2469/1), (2500/4), (2502/2), (2519/1)</p> <ul style="list-style-type: none">• Issue 4: Winchester should not accept additional development to meet shortfalls in other parts of the District / at West of Waterlooville (1125/1), (2496/1), (2518/1), (2519/1)• Issue 5: The process of selection of Local Reserve Sites was flawed as it was based only on omission sites put forward by developers (2474/1), (2518/1)• Issue 6: If the proposal is flawed it should be rejected (2518/1)• Issue 7: If the Pitt Manor site were deleted as a Reserve Site, an alternative site could be allocated if and when the need arose, allowing public consultation (1/1), (331/6), (2474/1)• Issue 8: Its inclusion as a Local Reserve Site will make its future development more likely (1245/1), (2496/1), (2518/1)• Issue 9: Any development here would lead to pressure for further development along the southern and western boundaries of the City (131/1), (331/6), (2469/1), (2471/1), (2473/1), (2498/2), (2532/2)• Issue 10: If it is accepted as a Local Reserve Site, the field opposite Manor Orchard should be removed as it is the highest part of the site. A higher density could be	<p>overtaken by speculative planning applications and appeals. This would defeat the purpose of having reserve sites and result in an appeal-led, rather than a plan-led, system.</p> <p>In response to Issues 8 and 9, it is inevitable that the identification of the site would make it more likely to be developed, as the purpose of the allocation to provide for development if it is needed. However, the sites have now been identified in the Inspector's Report and that cannot be 'undone'. The reserve site status will, therefore, control whether and when the site is released. It will be possible, through future Local Development Documents, to review whether such an allocation should be retained. There is no reason to think that identification or development of the Pitt Manor site will lead to further development along the western or southern boundaries of the town. One of the key features of the site is its visual and physical containment by strong existing boundaries. Other land to the south or west is of a different character and development of Pitt Manor would not set a precedent for its release.</p> <p><u>Issue 10: Site area</u> The small field at the north-western end of the allocated area (opposite Manor Orchard) has been identified as being of ecological value. It was therefore excluded from development in the masterplan promoted to the Local Plan Inquiry by the site's owner. The Inspector noted this and that the site potentially warranted designation as a Site of Importance for Nature Conservation. It is not, therefore, proposed that this part of the site be developed for housing and the estimate of the housing capacity of the site reflects this. Although the land is included within the Local Reserve Site allocation, the new policy makes clear that this is for 'housing and related development' and the explanatory text refers to the Inspector's site-specific conclusions and requires they be taken into account in any future planning applications. It is proposed that this be reinforced by a minor addition to the explanatory text of the Plan, emphasising the need for proposals to accord with other relevant policies of the Plan, such as those relating to nature conservation. This will enable this part of the site to be retained and managed in open use, if and when the remainder of the site is developed for housing and possibly Park and Ride.</p> <p><u>Issue 11: Possible release of the site</u> The comment about the site needing to be released early in the Plan period is noted. When (or whether) any of the Local Reserve Sites will need to be released will be determined through monitoring of housing supply and estimates of future</p>
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<p>achieved on the remainder of the site (2473/1)</p> <ul style="list-style-type: none">• Issue 11: It would need to be released early in the Plan period to be of use (2532/2)• Issue 12: Insufficient weight has been given to the planning history of the site. The proposal has already been considered by the public and rejected. It should not be considered again (1288/1), (1371/2), (2518/1)• Issue 13: It would destroy the rural approach on this side of Winchester which is highly valued by residents and visitors (2500/4), (2501/4), (2517/1)• Issue 14: Its development would be contrary to policies for the urban fringe / would be a major intrusion into attractive countryside / Kilham Lane forms a firm barrier to development (331/6), (1288/1), (2471/1), (2500/4), (2519/1)• Issue 15: The site occupies a prominent position / green lung/ an area of high landscape quality and development would compromise the setting of Winchester and its relationship with the adjacent countryside. Insufficient weight has been accorded to "Winchester City and its Setting". (1/1), (131/1), (331/6), (1125/1), (1245/1), (1371/2), (2470/1), (2473/1), (2496/1), (2499/2), (2500/4), (2501/4), (2502/2), (2518/1), (2519/1)• Issue 16: It would erode the gap between Winchester and Hursley which the Council has sought to preserve	<p>provision. The proposed explanatory text of the Plan, and the draft Supplementary Planning Document on Local Reserve Sites, make it clear that the 'lead time' required before houses can be completed on-site will need to be taken into account. The ability of any of the sites to contribute housing provision when it is needed will, therefore, be a factor to be taken into account in deciding whether to release sites and which site(s) should be released.</p> <p><u>Issue 12: Planning history of the site</u> The planning history of the site was presented to the Inquiry and taken into account by the Inspector. However, the fact that development of the site has been resisted on the basis of previous planning policies does not prevent new planning policies being developed. The Inspectors have noted in various parts of their Report that the context for this Local Plan has changed from previous Plans or planning applications, in that Structure Plan requirements, Government policies or other factors have changed. It is not, therefore, possible to refuse to consider an objection to the Local Plan and the Local Plan Inquiry is the appropriate forum for such consideration.</p> <p><u>Issue 13 - 17: Landscape and Gap considerations</u> Issues 13 - 15 concern the landscape impact of development on this site and its intrusion into the countryside, which were key arguments put by the Council at the Inquiry. Specialist landscape evidence was submitted, which made full use of 'Winchester City and Its Setting', the 'Winchester District Landscape Character Assessment' and other relevant publications.</p> <p>Issues 16 and 17 suggest that the area should be protected from development, in view of the importance of the gap between Winchester and Hursley, or because it is maintained that the area is Green Belt. The site is not subject to Green Belt or Local/Strategic Gap policies and these are not, therefore, a basis for resisting development. The Inspector took account of the Council's evidence, including the fact that the land forms part of a designated 'Area of Special Landscape Quality' in the adopted Local Plan. However, he felt that the site was especially well screened and that residential development could take place without undue harm to the wider landscape.</p> <p><u>Issue 18: Nature conservation issues</u> Some respondents refer to the site's wildlife value and its identification as a 'Local Project Area' in the draft Biodiversity Action Plan.</p>
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Summary of Representation. *Change sought*

Recommended Response to Representation *Recommended Change*

<p>(2532/2)</p> <ul style="list-style-type: none">• Issue 17: Understood the site is Green Belt and protected from development (2495/1)• Issue 18: The site is within a Local Project Area for habitat protection in the draft Biodiversity Action Plan / the site is valued for its attractive landscape and wildlife. (1/1), (2517/1)• Issue 19: Support Policy but there should be a reference in it as well as the text (MOD 6.16) to additional capacity if the Park-and-Ride does not come forward (863/6)• Issue 20: A “Park and Ride” scheme here would be in the wrong place / it has confused policies for Park-and-Ride on the southern radial routes into the City (131/1), (1371/2), (2470/1), (2517/1)• Issue 21: The development would exacerbate traffic problems in Romsey Road, and in the town centre / it would harm the character of rural roads in the area / no traffic analysis has been done. The “green” entrance to the City of Romsey Road is highly valued. (1/1), (131/1), (1125/1), (1245/1), (1288/1), (1371/2), (2470/1), (2471/1), (2472/1), (2495/1), (2496/1), (2499/2), (2500/4), (2501/4), (2502/2), (2519/1), (2532/2)• Issue 22: Further housing in this area is not sustainable in terms of facilities and services (131/1), (2471/1), (2495/1), (2518/1)• Issue 23: The public were not aware of the possibility of the site being allocated for housing, or there would have been more opposition. (1/1),	<p>The site was surveyed for its ecological value prior to the Local Plan Inquiry and again in April 2006. Both surveys confirm that most of the area is of low ecological interest with only part of the site – Pitt Manor Meadow – being identified as meeting the SINC criteria for unimproved calcareous grassland. To improve its management, grazing has been introduced on the site since the first survey was carried out, and is now having a beneficial effect. For the reasons set out in the response to Issue 10, it is not proposed that this part of the site be developed for housing, but that it should be retained and managed in open use, if and when the remainder of the site is developed for housing and possibly Park and Ride.</p> <p>One respondent also refers to the area’s inclusion within the draft Winchester Diversity Action Plan, which has been undertaken since the Inspector considered the site. This document is still in draft and is intended to provide part of the evidence base for Local Development Documents when they are prepared. It cannot therefore be considered as a document which should influence the Local Plan Review, although the Plan’s provisions have been taken into account during its preparation.</p> <p>The Pitt Manor site lies within the Winchester to Sparsholt Local Project Area in the draft Biodiversity Action Plan, but this covers an extensive tract of countryside within which there are opportunities for local action on highlighted areas. Pitt Down East SINC is highlighted as an area for restoration but this SINC is part of the Farley Mount complex, not within the Local Reserve Site. The response to Issue 10 clarifies that any future development of the site would need to take account of the area’s ecological importance, retaining and managing it in an appropriate open use.</p> <p><u>Issues 19 - 20: Park and Ride issues</u></p> <p>The support for the policy is noted but it is not accepted that the reference in the text (in MOD 6.16) to additional capacity if the Park-and-Ride does not come forward should also form part of the new policy. Policies need to be expressed positively, and the new policy permits “housing and related development” which would include a park-and-ride facility if the need for it was demonstrated. It would in any case be quite inappropriate to include any site-specific requirements for Pitt Manor, as it is only one of four Local Reserve Sites, and, should any of them need to come forward, developers will need to take account of all relevant considerations and policies in any planning brief or design statement.</p>
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Winchester District Local Plan Review

Analysis of Representations on the Proposed Modifications

Chapter 6: HOUSING

Summary of Representation. *Change sought*

Recommended Response to Representation *Recommended Change*

<p>(2474/1)</p> <ul style="list-style-type: none">• Issue 24: Not all the relevant facts were available to the Inspector (2474/1) <p>Change sought – delete land at Pitt Manor, Winchester, as a Local Reserve Site</p>	<p>Other respondents have questioned the suitability of Pitt Manor as a location for a park and ride facility. This was fully discussed at the Inquiry and therefore the Inspector was aware of the implications. The Highway Authority has, however, been consulted again in case circumstances have changed but they have confirmed that any proposed park and ride element on the site would need to be assessed if and when the site is released for development. A facility at Pitt Manor, if required, would need to complement the main proposed park and ride site on Badger Farm Road (Local Transport Plan programme 2006-2011). Further work would also be required to identify the routeing of the park and ride bus and the measures required for the park and ride service. A complementary facility to the main park and ride site could be of benefit, but it is not possible to assess this further at this stage. It would therefore be appropriate to retain reference to the option in the text of the Plan.</p>
	<p><u>Issue 21: Other Transport issues</u></p> <p>A number of respondents are concerned about the impact the development would have on the surrounding highway network. This was also discussed fully at the Inquiry and therefore the Inspector was fully aware of the Highway Authority's concerns about access to the site and the potential impact on the surrounding roads, particularly Romsey Road.</p>
	<p>The Highway Authority has been consulted again and they confirm that any developer would need to demonstrate that a suitable vehicular access can be provided to the site. They also confirm that a transport assessment would be necessary for the developer to quantify the impact of additional traffic on both the existing signalised junctions and peak hour traffic delays on Romsey Road, and to demonstrate that a suitable pedestrian and cycle access into the site can be provided. The developer would also need to demonstrate that a suitable pedestrian /cycle crossing on Romsey road could be provided to access local schools and shops.</p>
	<p>The Inspector was aware of all these issues and the need for further analysis of the impact of the development on the local road network. He recognised, however, that there would be a further opportunity to resolve these issues before there was any commitment to the development, and that off-site improvements could reasonably be anticipated. He therefore concluded that highway issues were not an over-riding constraint. There has been no change in circumstances since the Inspector considered the issue and there highway issues would not be a reason for rejecting his recommendation.</p>

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Chapter 6: HOUSING

Summary of Representation.
Change sought

Recommended Response to Representation
Recommended Change

Issue 22: Sustainability

A number of respondents consider that further housing in this area is not sustainable in terms of facilities and services. The Inspector's recommendation, however, follows the sequential approach in PPG 3, in that edge of settlement locations are proposed to be held in reserve in case previously developed land within the settlements does not come forward at the anticipated rate. In recommending the allocation of specific sites, the Inspector has had full regard to District's most sustainable settlements and the proposed sites are adjacent to three of them – Winchester, Denmead and New Alresford. This would therefore be consistent with the Local Plan's strategy of concentrating development in such settlements.

The Inspector concluded in his Report that an urban extension to the largest settlement in the District adjoining one of the main transport corridors into the City made it a sustainable site in terms of accessibility. The site is also readily accessible to other local facilities such as shops and schools. It is not therefore true to say that the site would not be sustainable in terms of local facilities and services and this would not be a reason for rejecting the recommendation.

Issue 23: Public Consultation

Some respondents claim that they were not aware of the possibility of the site being allocated for housing, and that not all the relevant facts were available to the Inspector in that the Council did not consult with people directly affected by the choice of sites. The response to the choice of sites issue is set out fully in the General section of this Response. The issues being discussed at the Inquiry were well publicised and all the relevant facts relating to the site were made available to the Inspector at the Inquiry, in the form of detailed written evidence and discussion at a formal Inquiry session. Local people therefore had the opportunity to make representations at this time if they wished.

Conclusion

It has therefore been concluded that the representations on the Pitt Manor Local Reserve Site, Winchester, have not raised any new issues of significance which would warrant rejecting the Inspectors' recommendations.

Recommended Change:

Amend MOD 6.16 (new paragraph following MOD 6.15) by the addition of the following explanatory text:

The Inspector's report includes a number of site-specific

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Summary of Representation.
Change sought

Recommended Response to Representation
Recommended Change

conclusions which he reached relating to the development of the sites. Developers will need to take account of these in any planning brief or design statement that they submit to accompany planning applications. They will also need to take account of, and comply with, other relevant policies in the Plan that may apply to Local Reserve Sites, in particular those relating to nature conservation, flood risk, sustainable development and pollution, and other policies relevant to a particular reserve site. The Inspector highlighted the suitability of the Pitt Manor, Winchester site for a park and ride scheme on about 1 hectare of land. The need for such provision will be reviewed if and when the site is released and provision should be made if a need exists. If park and ride provision is not required the estimated site capacity is likely to increase by 30-50 dwellings.

MOD 6.13
New paragraph following MOD
6.12

Recommended Response to Representation

Representations:

- **Support:**

The support is welcomed.

Taylor Woodrow Developments Ltd
(397/6)

- **Objections:**

J Hayter (138/18)

The first sentence should be deleted, as it states that a decision to permit development will be made only in the light of regular monitoring of the supply. This conflicts with MOD 6.14 which correctly states that it is through considering both the supply and the “lead time before houses can be completed on the site(s). If this change is made, the 2nd sentence would more appropriately follow MOD 6.14.

Fundamentally, the decision about whether to release one or more of the sites will be informed by the Council’s annual monitoring of housing land supply. A decision about which site to release would also take account of lead times for the completion of housing and the paragraph at MOD 6.14 goes on to amplify how such decisions will be made.

Change sought – amend wording to reflect comments

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Chapter 6: HOUSING

Summary of Representation. *Change sought*

Recommended Response to Representation *Recommended Change*

Bovis Homes (205/3), Heron Land Developments Ltd. (2497/3)

The modification fails to recognise the need to liaise with the strategic planning authorities over the appropriateness of releasing a strategic reserve site to address any shortfall in provision as opposed to a local reserve site. In accordance with Structure Plan Policy H4, housing land supply should be monitored at both local and strategic levels.

Change sought – amend wording to reflect comments

Cala Homes (220/5)

Object to paragraph for the reasons given in the objection to MOD 6.12.

Change sought – amend wording to reflect comments

Eagle Star (Estates) Ltd (352/5)

Support identification of Local Reserve Sites should additional land need to be released. The release of small sites would provide a more flexible response towards meeting any shortfall in the period to 2011. The long-term requirement for these Local Reserve Sites should be reviewed in the LDF process, when the regional requirements of the South East Plan are known.

Change sought – not specified.

Mrs Payne (863/8)

Welcome the need for regular monitoring, but future assumptions on completions should be subject to consultation with the development interests (as referred to in MOD 6.15).

Change sought – modify text to reflect comments

Redrow Homes (Southern) Ltd (474/3)

The possible release of one of the two Structure Plan Reserve Sites in the District (north of Winchester MDA and the extension to the proposed West of Waterlooville MDA) would be taken by the Strategic Planning Authorities (Hampshire County Council, Portsmouth City Council and Southampton City Council) in the light of the monitoring of housing completions over a wider area than Winchester District alone. The new paragraph at MOD 6.15 indicates that the Council will consult with a wide range of stakeholders on its initial conclusions on its annual monitoring of housing completions. This will include the Strategic Planning Authorities, who also consult with the District Councils on the outcome of their annual monitoring. There will, therefore, be liaison between the relevant authorities.

The issues raised by respondents 220 and 352 are dealt with in response to their objection on MOD 6.12 above.

The Council is already committed through the AMR process to consultation with local housebuilders and other key stakeholders. The new paragraph at MOD 6.15 also states that the Council will consult on its initial conclusions regarding the need to release the LRSs in the light of its annual monitoring. Those conclusions will take into account the Council's assumptions regarding the lead times for any site that it is proposed should be released and interested parties will be able to comment on those assumptions.

The issues raised by respondent 474 are dealt with in response to their objection on MOD 6.12 above.

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Summary of Representation.

Change sought

Recommended Response to Representation

Recommended Change

The text should be modified to refer to the sequentially preferable status of identified Local Reserve Sites at Winchester, with Francis Gardens as a priority for release if annual monitoring identifies a shortfall in completions to meet the baseline housing requirement

Recommended Change:

None.

Change sought – *modify text to reflect comments*

MOD 6.14

New paragraph following MOD 6.13

Recommended Response to Representation

Representations:

- **Support:**

The support is welcomed.

Taylor Woodrow Developments Ltd (3977)

- **Objections:**

Cala Homes (220/6)

Object to the identification of Local Reserve Sites for the reasons set out in relation to MOD 6.12. It should be in the most sustainable location at Winchester, where there is only a single housing allocation, at Broadway/Friarsgate, to respond to the City's acute housing need. Part of the Winchester City (North) MDA site should be designated as a single allocation to meet the Local Reserve provision. The proposed method of delivery is likely to result in decisions not to release any of the allocations, as shortfalls of less than 200 dwellings are unlikely to be acted upon.

The issues raised by respondents 220, 352 and 474 are dealt with in response to their objections on MOD 6.12 above.

The criteria for selecting sites are overly prescriptive, and, in the case of affordable housing, irrelevant, as any shortfall would demand development

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Summary of Representation.

Change sought

Recommended Response to Representation

Recommended Change

at Winchester City where the need is concentrated. The concentration of the Local Reserve provision on a single site as proposed would avoid the need for criteria for site selection, as the land could be released in phases to meet the shortfall. The delivery of part of the site to meet baseline shortfalls need not conflict with the allocation as a reserve MDA as there is insufficient time within the current policy framework to deliver the entire 2000 dwellings anticipated. There is a clear indication that the site will not be released through the current development plan.

Change sought – *replace the four Local Reserve Sites with a single site on part of the Winchester City (North) Reserve MDA.*

Eagle Star (Estates) Ltd (352/6)

Support identification of Local Reserve Sites should additional land need to be released. The release of small sites would provide a more flexible response towards meeting any shortfall in the period to 2011. The long-term requirement for these Local Reserve Sites should be reviewed in the LDF process, when the regional requirements of the South East Plan are known.

Change sought – *not specified.*

Redrow Homes (Southern) Ltd (474/4)

The text should be modified to refer to the sequentially preferable status of identified Local Reserve Sites at Winchester, with Francis Gardens as a priority for release if annual monitoring identifies a shortfall in completions to meet the baseline housing requirement

Change sought – *modify text to*

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Summary of Representation.

Change sought

Recommended Response to Representation

Recommended Change

reflect comments

Mrs Payne (863/9)

'Taking into account the lead time required before houses can be completed on the sites' should not be a factor in determining the release of reserve sites, as it was not referred to by the Inspector, and given the relatively similar scale of the sites (except New Alresford), is largely irrelevant. Any Park and Ride facility at Pitt Manor could be developed at the same time as housing, and there is no need for land assembly there.

Change sought – *modify text to reflect comments*

Lead time is essential to the prioritisation of sites since the response to a shortfall in baseline housing land supply may require a rapid response. The SPD that amplifies the new Policy explains that lead time is often, but not necessarily, related to the size of the site.

While the Inspector did not specify the release mechanism, neither did he prioritise the Local Reserve Sites in order of their release should a shortfall be identified in the baseline housing land supply. These details were deferred to the Council to be decided as part of an SPD. The comments relating to the assembly of the Pitt Manor site and the potential for the simultaneous development of housing and Park and Ride are noted.

S Duck (2500/5), S Duck(2501/5)

There is no need for Local Reserve Sites as the urban capacity study demonstrates that the development requirements can be met by sites in the built-up areas together with the two MDAs. Development should not be permitted on the Pitt Manor Local Reserve site because it would intrude into the countryside, it is important to the landscape setting of Winchester, it would exacerbate the traffic in Romsey Road, and the lead time would make it unviable.

Change sought – *delete Local Reserve Sites*

The issues raised by respondents 2500 and 2501 are dealt with in response to their objections on MOD 6.12 above.

Recommended Change:

None.

MOD 6.15

New paragraph following MOD 6.14

Recommended Response to Representation

Representations:

- **Support:**

The support is welcomed.

**Taylor Woodrow Developments Ltd
(397/8)**

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Chapter 6: HOUSING

Summary of Representation.
Change sought

Recommended Response to Representation
Recommended Change

- **Objections:**

J Hayter (138/19)

The paragraph should be deleted and replaced by a paragraph making relative sustainability the sole criterion. Prioritising on the size of shortfall is contrary to Guidance. There should be a criteria based policy and not a mere listing of the relevant factors to be considered in releasing the sites. An approach is needed which shortens the lead time between decision and additional completions and provides for public consultation to take place before a shortage triggers a release. This will require further SPD to be produced. (replacement wording suggested)

Change sought – amend wording to reflect comments

Cala Homes (220/7)

Object to the identification of Local Reserve Sites for the reasons set out in relation to MOD 6.12. It should be in the most sustainable location at Winchester, where there is only a single housing allocation, at Broadway/Friarsgate, to respond to the City's acute housing need. Part of the Winchester City (North) MDA site should be designated as a single allocation to meet the Local Reserve provision. The proposed method of delivery is likely to result in decisions not to release any of the allocations, as shortfalls of less than 200 dwellings are unlikely to be acted upon.

The criteria for selecting sites are overly prescriptive, and, in the case of affordable housing, irrelevant, as any shortfall would demand development at Winchester City where the need is concentrated. The concentration of

PPG 3 advises that local planning authorities should only seek to identify sufficient land to meet their housing requirement. In determining which of the LRSs to release, the size of any shortfall will therefore be an important factor, to ensure that no more greenfield land than is necessary is released for development. The Inspector has selected the LRSs based on their sustainability in comparison to other omission sites submitted to the Local Plan Inquiry. The relative sustainability of each of the LRSs is acknowledged to be an important factor in prioritising their release. The SPD amplifying the new Policy indicates that it is the most important factor after issues relating to the delivery of housing have been considered. However, other factors might need to be taken into account if it were to prove impossible to distinguish between the LRSs on sustainability grounds.

The Inspector has not recommended a criteria-based policy for the release of the sites and it would be difficult to envisage how such a policy could work satisfactorily. Instead he has recommended that the mechanism for the release of the LRSs should be the subject of an SPD. The new paragraph at MOD 6.15 outlines the factors that the Council will consider when making decisions about the possible release of the LRSs. These factors are further amplified and listed in order of importance in the SPD.

Consultation on the Annual Monitoring Report (AMR) will enable interested parties to make representations on the Council's conclusions, including its view as to whether, and if so when, LRS(s) should be released to ensure that the baseline housing requirement is met. It is considered that the the Proposed Modifications and the SPD provide sufficient guidance in this respect.

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Summary of Representation.
Change sought

Recommended Response to Representation
Recommended Change

the Local Reserve provision on a single site as proposed would avoid the need for criteria for site selection, as the land could be released in phases to meet the shortfall. The delivery of part of the site to meet baseline shortfalls need not conflict with the allocation as a reserve MDA as there is insufficient time within the current policy framework to deliver the entire 2000 dwellings anticipated. There is a clear indication that the site will not be released through the current development plan.

Change sought – *replace the four Local Reserve Sites with a single site on part of the Winchester City (North) Reserve MDA.*

Eagle Star (Estates) Ltd (352/7)

Support identification of Local Reserve Sites should additional land need to be released. The release of small sites would provide a more flexible response towards meeting any shortfall in the period to 2011. The long-term requirement for these Local Reserve Sites should be reviewed in the LDF process, when the regional requirements of the South East Plan are known.

Change sought – *not specified.*

Redrow Homes (Southern) Ltd (474/5)

The text should be modified to refer to the sequentially preferable status of identified Local Reserve Sites at Winchester, with Francis Gardens as a priority for release if annual monitoring identifies a shortfall in completions to meet the baseline housing requirement

Change sought – *modify text to reflect comments*

The issues raised by respondents 220, 352, 474, 2500 and 2501 are dealt with in response to their objections on MOD 6.12 above.

Recommended Change:

None.

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Summary of Representation.

Change sought

Recommended Response to Representation

Recommended Change

S Duck (2500/6), S Duck (2501/6)

Development should not be permitted on the Pitt Manor Local Reserve site because it would harm the countryside, exacerbate the traffic, and the lead time would make it unviable.

Change sought – delete Local Reserve Sites

MOD 6.16

New paragraph following MOD 6.15

Recommended Response to Representation

Representations:

- **Support**

The support is welcomed.

Mrs Payne (863/7)

- **Objections:**

J Hayter (138/20)

The wording should be modified to reflect the change suggested to MOD 6.15 (wording change suggested).

See response to respondent 138 on MOD 6.15 above.

Change sought – amend wording to reflect comments

Eagle Star (Estates) Ltd (352/8)

Support identification of Local Reserve Sites should additional land need to be released. The release of small sites would provide a more flexible response towards meeting any shortfall in the period to 2011. The long-term requirement for these Local Reserve Sites should be reviewed in the LDF process, when the regional requirements of the South East Plan are known.

The issues raised by respondents 352, 474, 2500, 2501 and 2530 are dealt with in response to their objections on MOD 6.12 above

Recommended Change:

None.

Change sought – not specified.

Redrow Homes (Southern) Ltd (474/5)

The text should be modified to refer to

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Summary of Representation.
Change sought

Recommended Response to Representation
Recommended Change

the sequentially preferable status of identified Local Reserve Sites at Winchester, with Francis Gardens as a priority for release if annual monitoring identifies a shortfall in completions to meet the baseline housing requirement

Change sought – *modify text to reflect comments*

CPRE (2530/3)

Object to identification of Pitt Manor, Little Frenchies Field and Pitt Manor. Pitt Manor and Francis Gardens are part of the integral landscape setting of Winchester. Little Frenchies Field is greatly valued as a readily accessible open space by the local community. The development of Pitt Manor and Francis Gardens would impact on the local road network. Pitt Manor is a valued ecological site and development at Francis Gardens would adversely affect SSSI and SAC along the River Itchen.

Change sought – *consider alternative brownfield locations to meet any identified shortfall*

S Duck (2500/7), S Duck (2501/7)

Object to the proposal for Park-and-Ride at Pitt Manor. It is in the wrong location and Romsey Road is already over-congested. The site is important to the landscape setting of Winchester and is an important rural approach to the town.

Change sought – *delete Park-and-Ride proposal at Pitt Manor*

MOD 6.18
Paragraph 6.29, moved forward to follow paragraph 6.28

Recommended Response to Representation

Representations:

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Summary of Representation. *Change sought*

Recommended Response to Representation *Recommended Change*

- **Objections:**

J Hayter (138/1)

The first sentence should be amended to read "...development will need to be limited and strictly controlled to protect the countryside...."

It is considered that if development is to be 'strictly controlled' it will, by definition be 'limited'. Therefore, it is not considered that the Plan would be improved or made clearer by the addition of the suggested wording.

Change sought – amend wording to reflect comments

Cala Homes (220/8)

The modification should make clear that housing outside the identified settlement boundaries will not be permitted.

The wording of the text in MOD 6.18 does make it clear that development outside identified settlement boundaries will be 'strictly controlled'. However, it was not the intention of the Local Plan Inspector or of the new Policy H.3 to prevent all housing development outside H.2 boundaries. The new Policy H.3 and its explanatory text, along with the proposed Supplementary Planning Document, set out the criteria which will be used to assess development proposals outside policy boundaries.

Change sought – amend wording to reflect comments

Recommended Change:

None.

MOD 6.19 **Replacement Policy H.3**

Recommended Response to Representation

Representations:

- **Support**

The support is welcomed.

D Wyeth (1086/1)

- **Objections:**

J Hayter (138/2), Bishop's Waltham Society (2355/2)

Object to the wording of the replacement policy. The words "infill residential development" should be replaced by "residential development that is infill in character". A new criterion should be added limiting development to previously developed

The suggested replacement wording does not provide any additional clarity.

The PPG 3 site search sequence that gives priority to the selection of previously-developed sites applies principally to the identification of sites to be allocated in local plans. This approach is confirmed in Draft PPS 3. The site search sequence is less applicable to windfall sites such as those

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Change sought

Recommended Response to Representation

Recommended Change

land, unless there is a local need.

arising from the application of (new) Policy H.3.

Change sought – amend wording to reflect comments

Denmead Parish Council (2246/2)

The policy is insufficiently tightly worded. As currently worded, criterion (i) could be used to expand the edge of a village outwards into greenfield areas, in conflict with the aims of PPG 3. As there will be no identification of rural parishes, the policy could be applied to both existing larger and remote settlements. Propose that the wording of criterion (i) is changed to “...at least ~~one~~ two (or alternatively) both sides are part of ~~would adjoin~~ an existing residential boundary;

Policy H.3 of the Revised Deposit Plan did not preclude development on greenfield sites. Despite recommending substantial changes to the Policy, the Inspector did not recommend restricting infill development to previously developed land. In reaching his conclusions, the Inspector took into account all of the representations on the draft Policy and relevant Government planning policy guidance and statements.

The Policy needs to be read in its entirety. The main body of the policy text restricts proposals that would be permissible under the terms of this Policy to “infill” residential development. Infilling/ Infill Development is defined in the glossary to the Plan (as proposed to be modified) as: “*New development which occupies gaps within built-up areas or on otherwise continuously built-up frontages between existing developments*”. The Policy could not therefore be used to expand the village outwards.

Change sought - amend wording as suggested.

P Stallard (2534/3)

The wording may result in additional development which extends a village into greenfield areas. It would be more appropriate to ensure that at least two sides would adjoin an existing residential boundary.

Change sought – amend wording to reflect comments

E J & M Gamble (2385/1)

Land at Green Lane, Hambledon would be suitable for infilling.

The suitability of specific sites for infill development in this location can only be tested by the application of the Policy criteria, as amplified by the more detailed criteria set out in the Supplementary Planning Document. It would not be appropriate for the Local Plan to refer to specific sites, or to comment on them in this context.

Change sought – amend policy to allow infilling in this location

Bramdean and Hinton Ampner Parish Council (2535/1)

Criterion (i) should be amended to read: “The site is well-related to an existing village or settlement in that both sides are part of an existing residential boundary and not backland

Matters relating to the scale and form of proposed infill development are addressed under Criterion (ii) of the Policy and amplified in the Supplementary Planning Document. A specific reference to the appropriateness or otherwise of backland development is too detailed a matter to be specifically addressed in Policy H.3 itself.

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Summary of Representation.
Change sought

Recommended Response to Representation
Recommended Change

development". The purpose of the amendment is to safeguard settlement boundaries and to minimise the impact of infill on the appearance of our villages.

Change sought - amend wording as suggested.

B Reeves-Rowland (2533/1)

Land at Curdrige would meet the three criteria of the policy and therefore planning permission should be granted.

The suitability of specific sites for infill development in this location can only be tested by the application of the Policy criteria, as amplified by the more detailed criteria set out in the Supplementary Planning Document. It would not be appropriate for the Local Plan to refer to specific sites, or to comment on them in this context.

Recommended Change:

None.

MOD 6.20
Paragraph 6.30

Recommended Response to Representation

Representations:

- **Objections:**

J Hayter (138/3)

The phrase "in Chapter 4" should be deleted. The modified text refers to policies in Chapters 4 and 6. Either both Chapters should be referred to or neither.

Change sought – amend wording to reflect comments

The reference to Chapter 4 is factually correct. Chapter 4 includes policies that concern proposals for housing development that are related to agricultural and similar development, and it is these which are being referred to. The text then goes on to refer to policies in the Housing Chapter, but as the text is also within the Housing Chapter there is no need for a cross-reference.

Recommended Change:

None.

MOD 6.21
Paragraph 6.31

Recommended Response to Representation

- **Objections:**

J Hayter (138/4)

The issue raised by respondent 138 is dealt with in response

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Summary of Representation.

Change sought

Recommended Response to Representation

Recommended Change

The text should be amended, to restrict housing development to previously developed land and that which is infill in character (wording change suggested).

to the objections on MOD 6.19 above

Recommended Change:

None.

Change sought – amend wording to reflect comments

MOD 6.22

Paragraph 6.32

Recommended Response to Representation

- **Objections:**

J Hayter (138/5)

The text should be modified to recognise the difference between developing brownfield land and infill on greenfield land (wording change suggested).

The issue raised by respondent 138 is dealt with in response to the objections on MOD 6.19 above

Change sought – amend wording to reflect comments

B Jezeph on behalf of clients (2537/1)

Object to definition of “infilling” in the Glossary which is too limiting.

The Proposed Modification to the Glossary definition of Infilling/ Infill Development does not imply any restriction to the circumstances in which infilling will be permissible; rather, it clarifies the circumstances in which such development may be acceptable. It is important to provide this clarification in view of the increased importance that will be attached to the definition of infilling given the criteria of new Policy H.3.

Recommended Change:

None.

MOD 6.23

Paragraph 6.33

Recommended Response to Representation

- **Objections:**

J Hayter (138/6)

The text should be modified to reflect PPGs 3 and 13 and PPS 7, which

The issue raised by respondents 138 is dealt with in response to the objections on MOD 6.19 above.

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Summary of Representation.

Change sought

require development to normally be on previously developed land and for service centres to be defined. Neither the Guidance nor the Local Plan require safe and convenient access. Welcome reference to meeting a "particular local need" identified in a Parish Plan. (wording change suggested).

Change sought – amend wording to reflect comments

Recommended Response to Representation

Recommended Change

The proposed new paragraph reflects the following Government definition of sustainable communities set out the Office of the Deputy Prime Minister's publication "Sustainable Communities: People, Places and Prosperity - Five Year Plan (January 2005): "Sustainable communities should be(5) well connected and should offerfacilities to encourage safe walking and cycling" (underlining added). It is considered that these forms of sustainable transport need to be safe and convenient to offer an attractive alternative to the car.

Recommended Change:

None.

MOD 6.24

New paragraph following paragraph 6.33

- **Objections:**

J Hayter (138/7)

The text should be deleted and replaced with new text referring to Policies C.22 and C.23 (wording change suggested to replace MODs 6.24, 6.26 and 6.27).

Change sought – amend wording to reflect comments

J Hayter (138/9)

MODs 6.24, 6.26 and 6.27 should be replaced with text that conforms to guidance in PPG 12 to avoid repetition and expands the statement within the Policy requiring proposals to accord with other relevant policies of the Plan (wording change suggested).

Change sought – amend wording to reflect comments

B Jezeph on behalf of clients (2537/2)

A separate objection is made to the Supplementary Planning Document.

Recommended Response to Representation

Policy C.22 relates to extensions to dwellings and replacement dwellings in the countryside. Policy C.23 limits the change of use of non-residential buildings to housing within the countryside. Infilling development permissible under Policy H.3, as proposed to be modified, may include previously developed land on which non-residential buildings stand. It is therefore appropriate for the paragraph to refer to these circumstances.

Government guidance as referred to by the objector has been incorporated into the SPD that amplifies the policy and supporting text. The SPD is the appropriate tool to amplify the policy rather than the supporting text within the Local Plan. Similarly, there is no need to add further general cross-referencing and the Inspectors recommended the deletion of much of the cross referencing that occurred in the Plan, especially within its policies.

Noted – see responses to the representations on the Implementation of the Infilling Policy SPD.

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Summary of Representation.
Change sought

Recommended Response to Representation
Recommended Change

Change sought – not specified

Recommended Change:

None.

MOD 6.25
New paragraph following MOD 6.24

Recommended Response to Representation

- **Objections:**

J Hayter (138/8)

Additional text should be added to reflect the requirements of PPG 3, PPS 7 and Policy C.6 (wording change suggested).

The issue raised by respondent 138 is dealt with in response to the objections on MOD 6.24 above. Policy C.6 is one of many policies in the Plan that will be applicable to the consideration of proposals for infill development and there is no need to cross-refer to it.

Change sought – amend wording to reflect comments

Recommended Change:

None.

MOD 6.26
New paragraph following MOD 6.25

Recommended Response to Representation

- **Objections:**

J Hayter (138/9)

MODs 6.24, 6.26 and 6.27 should be replaced with text that conforms to guidance in PPG 12 to avoid repetition and expands the statement within the Policy requiring proposals to accord with other relevant policies of the Plan (wording change suggested).

The issue raised by respondent 138 is dealt with in response to the objections on MOD 6.24 above.

Recommended Change:

None.

MOD 6.27
New paragraph following MOD 6.26

Recommended Response to Representation

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Summary of Representation.

Change sought

Recommended Response to Representation

Recommended Change

- **Objections:**

J Hayter (138/10)

MODs 6.24, 6.26 and 6.27 should be replaced with text that conforms to guidance in PPG 12 to avoid repetition and expands the statement within the Policy requiring proposals to accord with other relevant policies of the Plan (wording change suggested).

The issue raised by respondent 138 is dealt with in response to the objections on MOD 6.24 above.

Change sought – amend wording to reflect comments

B Jezeph on behalf of clients (2537/3)

Object to the exclusion of development in Local and Strategic Gaps. Reference should be made only to Policy C.4.

The wording of the paragraph does not conflict with Policy C.4 and merely clarifies that the Infilling policy should not be interpreted as providing for exceptions to be made to that Policy.

Change sought – amend wording to reflect comments

Recommended Change:

None.

MOD 6.28

New paragraph following MOD 6.27

Recommended Response to Representation

The support is welcomed.

- **Support:**

Recommended Change:

J Hayter (138/16)

None.

MOD 6.40

Second new paragraph following re-positioned paragraph

Recommended Response to Representation

- **Objection:**

Hampshire County Council (Estates) (1434/4)

Support the explicit reference to key worker housing, but the wording could infer that the Council is seeking a

The respondent considers that the wording is not clear and that it could be interpreted to mean that a range of affordable housing types will be sought on the modest increase only,

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Summary of Representation.

Change sought

range of types of affordable housing on the modest increase only, rather than the overall proportion of affordable housing (the full 35%). The word “additional” should be replaced by “revised”.

Change sought – amend wording to reflect comments

Recommended Response to Representation

Recommended Change

rather than the full 35%. It is difficult to see how it could be misinterpreted, given that the paragraph goes on to refer specifically to larger sites being more suitable for mixed tenures. It is not therefore considered that any change to the wording is necessary.

Recommended Change:

None.

MOD 6.43

New paragraph following paragraph 6.45

- **Support:**

Taylor Woodrow Developments Ltd (397/9)

The support is welcomed.

- **Objections:**

Cala Homes (220/9)

Object to wording which suggests that Local Reserve Sites would be expected to deliver a minimum of 35% affordable housing, regardless of location. Policy H.5 (as revised by MOD 6.49) seeks 40% affordable housing on all sites within Winchester and at the Winchester City (North) MDA. In the light of the acknowledged housing needs in Winchester and the District, it is crucial that all developments above the policy threshold at Winchester deliver at least 40% affordable housing. Suggest the paragraph should be re-worded to read: “The local planning authority will seek 40% affordable housing on the Local Reserve Site at Winchester to help meet affordable housing need in the City.”

Change sought - amend wording as suggested

Recommended Response to Representation

The wording of the new paragraph refers to the expectation that Local Reserve Sites would deliver a minimum of 35% of their dwellings as affordable homes. This provides the necessary flexibility to vary the proportion, if a greater need can be demonstrated. Whilst it is anticipated that it would be appropriate to seek 40% affordable housing on sites adjacent to Winchester, including the Local Reserve Sites, it would not be appropriate to specify 40% in the Plan at this stage, as this would not be consistent with the Inspector’s recommendation, and circumstances may change over time. It would be more appropriate to negotiate the proportion of affordable housing if and when the need for the release of a particular site is identified, and would not therefore be appropriate to re-word the paragraph as suggested.

It is, however, proposed to amend the wording of the Supplementary Planning Document on Implementation of Local Reserve Sites to clarify the expectation that sites adjoining Winchester should provide 40% affordable housing.

Recommended Change:

None.

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Summary of Representation.
Change sought

Recommended Response to Representation
Recommended Change

MOD 6.48 Paragraph 6.50

Recommended Response to Representation

Representations:

- **Support:**

The support is welcomed.

Taylor Woodrow Developments Ltd
(397/10)

Recommended Change:

None.

MOD 6.49 Policy H.5

Recommended Response to Representation

Representations:

- **Support:**

Taylor Woodrow Developments Ltd
(397/11), Hampshire County
Council (Estates) (1434/6)

The support is welcomed.

- **Objections:**

Grainger Trust (214/1)

Concerned that the implication of the first part of the policy is that development will not be permitted at the MDA if 40% affordable housing is not provided. Given the substantial infrastructure costs, it is likely that a lower percentage may be appropriate. The Inspector clearly recommended 'up to 40% affordable housing in view of the desire not to inhibit viability and its early implementation whilst striving to create a sustainable community'. Criterion (ii) of the Policy should therefore be amended to "up to 40% provision".

Change sought - amend wording as suggested

Cala Homes (220/10)

Object to revised text which expects Local Reserve Sites to deliver a

Respondents 214 and 236 are both concerned about the wording of revised Policy H.5 and criterion (ii) in particular, which sets out the proportion of affordable housing to be sought within the West of Waterlooville MDA and within the Strategic Reserve provision. The criterion is worded exactly as the Inspector recommended in paragraph 6.14.20 (g) of his Report and, therefore, it must be assumed that it was his intention to include a precise proportion in the policy, in order to express the policy in a positive way. The proportion is, however, qualified by a change to the wording of paragraph 6.44 (MOD 6.41), to reflect the Inspector's recommendation in his paragraph 6.14.20 (d), which explains that the proportion sought, of up to 40%, will need to ensure that a viable development is achieved. From the information obtained to date, it does not appear that the infrastructure costs for either MDA development would be abnormal for a major new greenfield site, but, if they do prove to be so, it will be for the developers to demonstrate this and justify a lower proportion of affordable housing at the time of negotiation.

Respondent 220 is raising a similar issue to that raised in their

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

Recommended Response to Representation ***Recommended Change***

minimum of 35% affordable housing, regardless of location. The Policy seeks 40% affordable housing on all sites within Winchester and at the Winchester City (North) MDA. In the light of the acknowledged housing needs in Winchester and the District, it is crucial that all developments above the policy threshold at Winchester deliver at least 40% affordable housing. The Policy should be revised to require 40% provision on the Local Reserve component.

Change sought - amend wording as suggested

George Wimpey UK Ltd (236/1)

The Inspector referred to 'up to 40%' affordable housing at the West of Waterlooville MDA and elsewhere in the Proposed Modifications, this approach is followed. MOD 6.49 refers to '40%'. It should have 'up to' added or a qualifier.

Change sought - amend wording as suggested

Mrs Payne (873/11)

Support a minimum of 35% affordable housing in principle on the reserve sites, but the text should make a similar acknowledgement to that for the Strategic Reserve MDA, of the significant contribution that would be made by the Local Reserve Sites to the demand for such housing in Winchester

S Duck (2500/8), S Duck (2501/8)

A combination of sites within the defined built-up areas and the two MDAs should provide adequate affordable housing. Pitt Manor should not be considered as a site for housing, affordable or otherwise.

representation on MOD 6.43, in which they consider that the Local Reserve Sites adjacent to Winchester should deliver at least 40% affordable housing. They are therefore seeking a revision of criterion (iv) of Policy H.5, to increase the proportion to 40% for sites adjacent to Winchester. The wording of the new paragraph following paragraph 6.45 (MOD 6.43) refers to the expectation that Local Reserve Sites would deliver a minimum of 35% of their dwellings as affordable homes. This provides the necessary flexibility to vary the proportion, if a greater need can be demonstrated. Whilst it is anticipated that it would be appropriate to seek 40% affordable housing on sites adjacent to Winchester, it would not be appropriate to specify 40% in the Plan at this stage, as this would not be consistent with the Inspector's recommendation, and circumstances may change over time. It would be more appropriate to negotiate the proportion of affordable housing if and when the need for the release of a particular site is identified, and would not therefore be appropriate to re-word the Policy as suggested.

It is, however, proposed to amend the wording of the Supplementary Planning Document on Implementation of Local Reserve Sites to clarify the expectation that sites adjoining Winchester should provide 40% affordable housing.

Respondent 873 supports in principle a minimum of 35% affordable housing for the Local Reserve Sites, as expressed in Policy H.5, with the precise proportion being determined at the time of application. She considers, however, that the supporting text in MOD 6.43 should be amended to refer to the significant contribution to affordable housing that the Local Reserve Sites adjacent to Winchester, particularly Pitt Manor, could make to meet the considerable need in Winchester, in the same way as this is referred to in MOD 6.42 for the Strategic Reserve MDA at Winchester City (North). Although one of the Local Reserve Sites may achieve a substantial number of affordable homes compared to most other local sites, it would not be unique, and therefore it would not be appropriate to make a specific reference in this respect. If the site came forward, the affordable housing provision would, in any case, be substantially smaller than that for a Strategic site.

All housing sites, whether within the settlements or within the MDAs will be expected to provide the maximum amount of affordable housing achievable, in accordance with the Plan's affordable housing policies. The suitability of Pitt Manor as a Local Reserve Site has already been considered and a response provided under the response to representations on

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Summary of Representation.
Change sought

Recommended Response to Representation
Recommended Change

Change sought – not specified.

MOD 6.12 (Site Specific Matters, Pitt Manor).

Recommended Change:

None.

MOD 6.53 Paragraph 6.53

Recommended Response to Representation

- **Objection:**

Hampshire County Council (Estates) (1434/5)

Support the explicit reference to key worker housing, but the wording could infer that the Council is seeking a range of types of affordable housing on the modest increase only, rather than the overall proportion of affordable housing (the full 35%). The word “additional” should be replaced by “revised”.

Change sought – amend wording to reflect comments

The respondent refers to wording in paragraph 6.53, which it is proposed to delete in accordance with the Inspector's recommendation 6.14.20(f), to restructure the affordable housing section and omit unnecessary details and repetition. Accordingly, the reference to key worker housing is now in MOD 6.40, on which the respondent has made the same representation. It is considered that key worker housing is adequately covered by MOD 6.40 and the response to the same respondent's comment on it. It is therefore considered that the proposed deletion of this paragraph should remain.

Recommended Change:

None.

MOD 6.61 Paragraph 6.74

Recommended Response to Representation

Representations:

- **Support**

The support is welcomed.

J Hayter (138/11), Winchester City Residents' Association (331/3)

- **Objections:**

A P Ames (1371/1)

The Council has not given due weight to the Inspector's comment in paragraph 6.5.12 of his Report.

Change sought – strengthen wording

The respondent's comment is somewhat surprising as he considers that due weight has not been given to the Inspector's comment in paragraph 6.5.12 of his report. The proposed wording change to paragraph 6.74 is almost identical to the Inspector's wording in his paragraph 6.5.12,

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Summary of Representation.
Change sought

Recommended Response to Representation
Recommended Change

to preserve quality of buildings and the space around them.

and therefore would appear to meet the respondent's concerns.

Recommended Change:

None.

MOD 6.62
Policy H.7

Recommended Response to Representation

Representations:

- **Support:**

The support is welcomed.

Mr & Mrs Fraser (836/1)
Support changes to Policy H.7 on density requirements.

Recommended Change:

None.