

Your Place, Your Plan

**‘Homes for All’ –
Development Strategy**

**Summary of Comments and
Issues Raised**

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1. Development Strategy – Summary of Responses (Homes for All Question 1)

1.1 A key element of the consultation in relation to Homes for All concerned the potential development strategy. Four possible Approaches to the spatial distribution of development were outlined in the Strategic Issues and Priorities document, although it was recognised that variations on these could be developed. Question 1 was about respondents’ preferences for the 4 Approaches:

What are your views on the alternative possible approaches towards accommodating development in the district? Please score these approaches in order of preference with 1 being your most preferred approach and 4 being the worst approach:

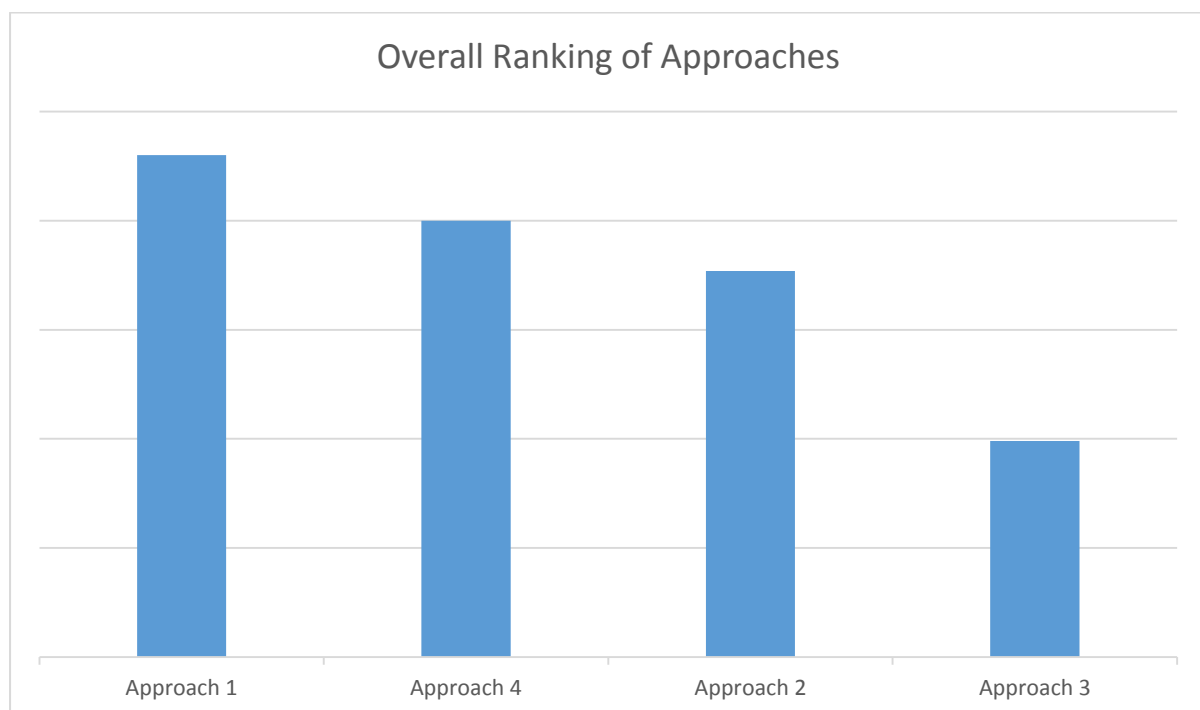
Approach 1: A development strategy based on the approach in the existing Local Plan of distributing development to a sustainable hierarchy of settlements

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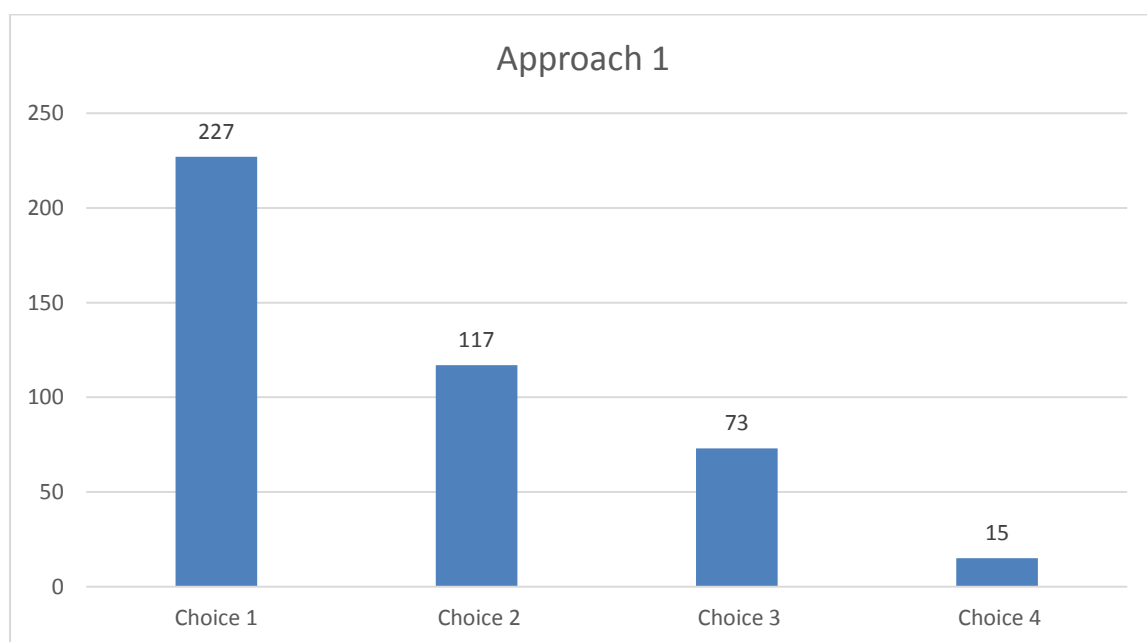
Approach 4: A strategy of dispersing development around the district largely in proportion to the size of existing settlements

1.2 The overall response in terms of the relative preferences expressed through the online consultation (Citizen Space) for each Approach was:



1.3 The relative strength of opinion on each approach was also recorded, with people asked to score their 'most preferred approach' as 1 and their 'worst approach' as 4. People were also given the opportunity to explain their choices or comment on whether any approaches were missing. The following tables show the 'choices' for each Approach (by number of respondents), followed by a summary of the 'free text' comments relating to each Approach. The tables include any responses received by email, letter, etc that ranked the Approaches, in addition to those made online and used in the table above (these were very small in number and do not change the relative rankings).

Approach 1: A development strategy based on the approach in the existing Local Plan of distributing development to a sustainable hierarchy of settlements (all comments).



1.4 The charts above show that Approach 1 (a strategy based on a sustainable hierarchy of settlements) received the most support. The detailed scoring shows that 227 people selected it as their 'most preferred' approach (Choice 1) whereas very few people (15) viewed this as the 'worst approach' (Choice 4).

Summary of comments supporting / preferring Approach 1:

- Approach 1 is the most sustainable / sensible / fair / easily absorbed / least disruptive – **12 comments** (C3, C20, C42, C146, C206, C208, C220, E557, E699, E1211, E1218, E1230)
- The market towns and villages need some development / already provide facilities and services / include brownfield sites – **3 comments** (C7, C198, E225)

- Support options 1 and 4 which can deliver sustainable growth, market and affordable housing, and improved local services – **3 comments** (E678, E1072, E1080)
- Support options 1 and 2 as these can make best use of previously developed land such as Sir John Moore Barracks – **1 comment** (E1092)
- Option 1 would maintain a steady and robust supply of housing over the Plan period on different sized and geographically located sites – **1 comment** (E1223)

Summary of comments objecting / not supporting Approach 1:

- The Local Plan has led to excessive / damaging rural development / has caused anger about different housing targets for different areas – **4 comments** (C27, C160, C168, C186)
- The current settlement boundaries are too small, more homes should be built – **1 comment** (C139)
- Option 1 would do little to support climate change objectives as it would repeat existing development patterns and may not be deliverable given limited additional capacity in the South Hampshire Urban Areas – **1 comment** (E684)
- This replicates the adopted local plan with development principally directed towards Winchester and the South Hampshire Urban Area (SHUA), with the reliance on large sites harming the environment and frustrating delivery – **1 comment** (C597)

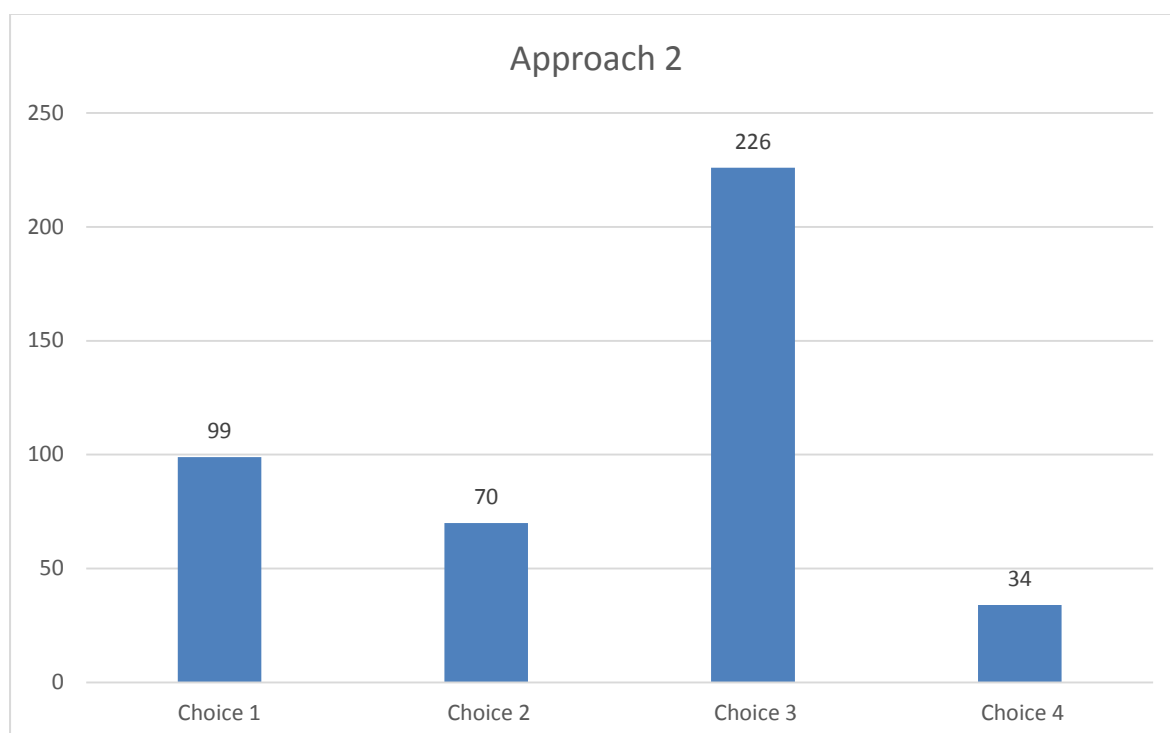
Summary of other comments on Approach 1:

- Don't know what a 'sustainable hierarchy of settlements' means – **5 comments** (C54, C61, C101, C149, E1182)
- Pressure to provide development may make some 'sustainable hierarchy' settlements unsustainable – **1 comment** (C187)
- More housing, shops and jobs would make the rural settlements more sustainable. Development is already planned for the most sustainable locations – **1 comment** (C309)
- There is limited scope for expansion of the SHUAs so it is no longer justified to treat the SHUA as a spatial development area to which development could be distributed pro-rata – **1 comment** (E1149)
- The current Local Plan strategy allocates a disproportionate amount of housing to the south of the district (SHUA and much of the Market Towns & Rural Area), which is car-based and not sustainable. If this were rectified this option may be more palatable – **1 comment** (E1244)
- This option risks missing opportunities for sympathetic development in smaller settlements which can have minimal impact on the environment – **1 comment** (E1058)
- Denmead should be maintained at its current level of development, it is a rural village and more homes would be harmful – **1 comment** (C95)
- Option 1 allows for housing more in keeping with Winchester than providing a large housing estate – **1 comment** (C152)

- Examine where there has been under delivery, e.g. New Alresford, and address this with new allocations – **1 comment** (C340)
- The allocation of Morgan’s Yard, Waltham Chase should be continued but revised in terms of its requirements for affordable housing, employment provision, access, and additional school land to ensure viability – **1 comment** (E1138)
- Approach 1 should be the fallback position if sites for new settlements cannot be found, as it seeks sustainable sites in order of size of communities – **1 comment** (E1216)

- 1.5 The ‘free text’ comments on Approach 1 suggest that the support is primarily on the basis that the existing settlement hierarchy is sensible and sustainable and has provided for development in a fair and reasonably well accepted way. One development interest comments that it would maintain variety in the size and location of development sites. Some respondents suggest that they also support other Approaches (2 or 4).
- 1.6 Several people objecting to Approach 1 feel that it has led to excessive, damaging or unpopular development, whereas another suggests it does not allow for enough development. There is some concern about the implications for the South Hampshire Urban Areas, or south of the district more generally, either in relation to the scale of development or its impact and deliverability.
- 1.7 There are a series of comments on Approach 1 which neither specifically support nor oppose this Approach. Several people did not understand the term ‘sustainable hierarchy of settlements’ used in the description of Approach 1, which was intended to refer to the settlement hierarchy in the existing Local Plan. Other comments tend to be individual responses, sometimes opposed to more development in the rural settlements with others supporting it, sometimes referring to particular locations. Points are made again about the South Hampshire Urban Areas and whether development can or should continue to be concentrated in these locations.
- 1.8 Overall, Approach 1 was the only Approach to receive substantial positive support, with more people choosing this as their 1st Choice than the other 3 Approaches combined. Some people were concerned about the scale of development in the rural area, while others felt there was a need for more development in the rural settlements. An issue was raised about whether there is the capacity to continue focusing development on the South Hampshire Urban Areas to the same extent as the current Local Plan (as noted in the Strategic Issues and Priorities document) or whether this is desirable.

Approach 2: To focus development on Winchester itself and other larger and more sustainable settlements



1.9 The chart above shows that Approach 2 (a strategy that focuses development on Winchester and other larger settlements) was not well supported. The detailed scoring shows most people (226) scored this as their 3rd choice (2nd worst approach), although a significant number (99) did select it as their 'most preferred' approach (Choice 1) or as Choice 2 (70). Relatively few people scored it as the 'worst approach' (34).

Summary of comments supporting / preferring Approach 2:

- Approach 2 would help reduce carbon emissions / reduce travel / use existing infrastructure / use brownfield land – **13 comments** (C27, C42, C56, C102, C123, C218, C505, C508, C580, E764, E906, E908, E1204)
- Larger settlements are the most sustainable – **3 comments** (C4, C127, E1233)
- Support Option 2 of focussing development on Winchester, but growth should be located to minimise constraints / provide for heritage, air quality and SAC protection – **2 comments** (C160, E1144)
- Support meeting the core housing requirement at the principal settlement of Winchester, this should be via MDA scale development – **1 comment** (E1121)
- Winchester should take its fair share of development – **1 comment** (C5)

- Focus development on Winchester and other sustainable settlements, but remove the words “other larger” – **1 comment** (C522)
- Option 2 has the advantages of creating green infrastructure, reducing carbon emissions, and achieving a 15-minute city, sites at north Winchester and south-west Winchester seem the leading candidates – **1 comment** (C168)
- Option 2 is the most sustainable approach as Winchester is a sustainable settlement that can support low carbon infrastructure, and has a high need for affordable housing. Development should be focussed to the south-west of Winchester – **1 comment** (E648)
- Support options 1 and 2 as these can make best use of previously developed land such as Sir John Moore Barracks – **1 comment** (E1092)

Summary of comments objecting / not supporting Approach 2:

- Focussing development on Winchester would mean smaller settlements would not be able to develop – **5 comments** (C111, E225, E1072, E1080, E1230)
- Increased development is inappropriate for Winchester / place too great a burden on infrastructure – **4 comments** (C63, C206, E1216, H91)
- This strategy would not support rural areas and would be harmful to Air Quality within the town, the Itchen SAC, and the Historic Environment – **2 comments** (C291, C597)
- Winchester’s boundaries should not be expanded, use Bushfield Camp and define a green belt – **2 comments** (C165, E1026)
- Oppose option 2 at least until an overall plan or spatial strategy is prepared. Winchester is a sustainable location but has important characteristics that should not be damaged, including the landscape setting, heritage assets, historic character; small scale and important views – **1 comment** (E1218)
- Development north of Winchester should be resisted – **1 comment** (C21)
- Focussing development on Winchester would change its character, as would allowing infill between Winchester and Hursley – **1 comment** (C100)

Summary of other comments on Approach 2:

- There should be a combination of approaches 2 and 4 allowing for housing in Winchester and smaller villages in the north of the district such as Sutton Scotney – **2 comments** (E1082, E1114)
- Because Winchester is the largest settlement does not necessarily mean that it should have the highest proportion of development, the next tier of settlements may provide a better opportunity to allow planned delivery of infrastructure to support future needs – **1 comment** (C536)
- This option risks missing opportunities for sympathetic development in smaller settlements which can have minimal impact on the environment – **1 comment** (E1058)
- Winchester has potential to be a vibrant city if development is done well, there are areas that can be redeveloped and space around the city – **1 comment** (C207)

- Accept the city will need to expand, this should only be after brownfield sites have been exhausted – **1 comment** (C79)
- Need to create cohesive communities in Winchester, not just bolt on developments, improve green travel links and use brownfield / town centre sites – **1 comment** (C75)
- Focus on redevelopment of the city centre, not development on open spaces outside - **1 comment** (C87)
- Achieve higher density to help carbon reduction – **1 comment** (C123)
- Some recent developments in Winchester have increased pressure on transport and services, sustainability is key – **1 comment** (C211)
- Development of the university and student accommodation should be a combined package, use of private dwellings has been destructive – **1 comment** (C273)
- Some of the pressure on housing in Winchester comes from the increase in student population as a result of a previous decision to approve the expansion of the university – **1 comment** (C423)
- If Sir John Moore Barracks is mentioned then other brownfield sites in Littleton and Harestock should be considered – **1 comment** (C340)
- Support the principle of focussing development on Winchester for sustainability reasons but the amount of development should be increased, with a corresponding reduction in the SHUA area – **1 comment** (E1149)
- Approach 2 raises the question as to at what stage of expansion Winchester ceases to be containable and walkable – **1 comment** (E1182)
- This option appears to be the most sustainable, except that it may mean the inclusion of the 'Royaldown' proposal, which makes it impossible to support – **1 comment** (E1244)

1.10 The 'free text' comments on Approach 2 suggest that the support is primarily on the basis that Winchester and the other larger settlements are the most sustainable and that focussing development there would help to reduce carbon emissions, reduce travel, use existing infrastructure, or enable brownfield land to be used. Some respondents promoted development of a particular type or in a specific location around Winchester.

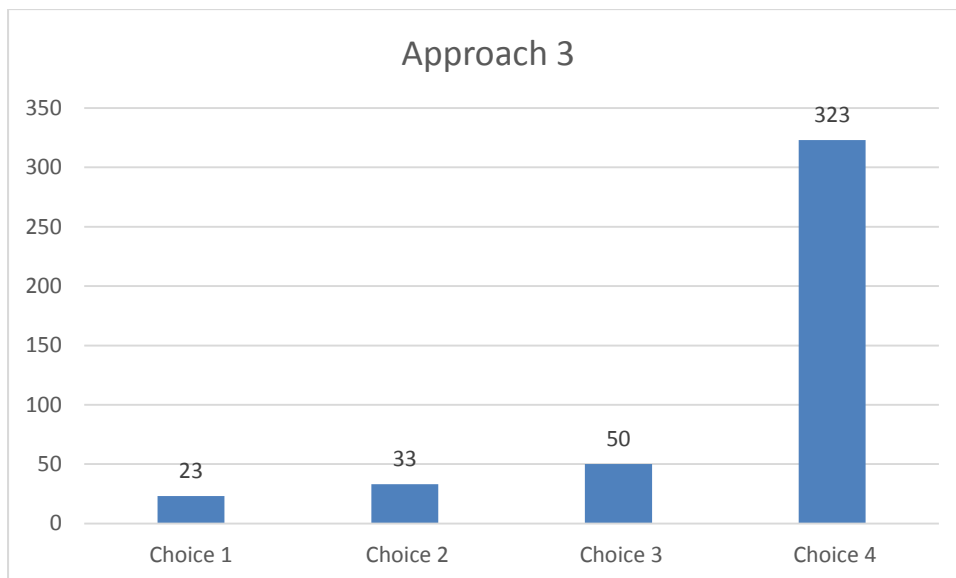
1.11 Many of the respondents objecting to Approach 2 were concerned that it would not support the rural area or allow for development in smaller settlements. The other main concern was around the impact on Winchester's character, historic environment and natural environment, pressure on infrastructure, or the threat of development in particular locations.

1.12 There are a series of comments on Approach 2 which neither specifically support nor oppose this Approach. Two development interests promote a combination of approaches 2 and 4 that would allow for development in villages in the north of the district and another respondent suggests that lower tier settlements may have advantages for development. Most comments tend to be individual responses with some respondents commenting on the need

for development to be sympathetic or high quality, or promoting higher densities or use of town centre sites. Two responses raise issues about the pressure from student accommodation. Other comments tend to either promote or oppose development of particular types or in certain locations around Winchester.

- 1.13 Overall, although Approach 2 received significant support, most respondents scored it as their 3rd choice. Those supporting it felt that focussing development in the larger settlements, especially Winchester, was the most sustainable approach. On the other hand, there was concern about limiting development in the rural settlements and the impact of development on the particular characteristics of Winchester. The scope for sympathetic higher density development and the use of town centre or brownfield sites was also often commented on.

Approach 3: A strategy that includes one or more completely new strategic allocations or new settlements



- 1.14 When people were asked for their comments on Approach 3 (a strategy that includes one or more completely new strategic allocations or new settlements) as the table above shows it was not well supported, particularly the prospect of new settlements. The detailed scoring shows most people (323) scored this as the worst approach (4th choice), several times more than the other approaches combined. Very few respondents identified Approach 3 as their preferred approach (23) and only slightly higher numbers scored it as their 2nd choice (33) or 3rd choice (50).

Summary of comments supporting / preferring Approach 3:

- Plan for a strategic allocation / new settlement rather than continual expansion of existing settlements – **3 comments** (C23, C136, C160)
- Well designed and connected ‘new towns’ would address housing needs in a sustainable manner – **2 comments** (C218, E190)
- Larger developments have more scope to support efficient use of resources / would support car-free commuting – **2 comments** (C36, C208)
- Approach 3 has the greatest ability to deliver a sustainable community for the future with less impact across the district. Limited early provision of transport and infrastructure can be offset by the highest quality energy design – **1 comment** (E1216)
- Support Approach 3 which would deliver the most benefits to Winchester and fit with the objectives of the Plan, in particular a new settlement at Micheldever Station which is deliverable and can respond to the disadvantages listed for option 3 – **1 comment** (E739)
- Support a new settlement at Micheldever which has good communication links, could encourage new businesses and infrastructure and allow rural areas to grow – **1 comment** (C224)
- A new settlement or strategic allocations should be considered, land to the south-west of Winchester could deliver housing, infrastructure and sustainability objectives – **1 comment** (E648)

Summary of comments objecting / not supporting Approach 3:

- Object to development at Micheldever Station for various reason including not needed, unsuitable location, loss of undeveloped gap between Winchester and Basingstoke, loss of countryside/agricultural land, impact on Micheldever/local environment, lack of transport/infrastructure, etc – **373 comments** (C3, C24, C29, C33, C52, C83, C91, C92, C94, C102, C125, C129, C134, C267, C283, C520, E14, E16, E21, E23, E25, E26, E28, E29, E30, E31, E40, E41, E42, E44, E45, E46, E47, E48, E50, E51, E53, E54, E55, E56, E57, E59, E63, E64, E67, E68, E70, E71, E73, E74, E75, E76, E77, E78, E79, E81, E86, E87, E88, E91, E93, E94, E96, E98, E99, E101, E106, E107, E108, E109, E111, E113, E115, E117, E118, E120, E123, E124, E125, E126, E128, E129, E131, E132, E133, E134, E137, E138, E139, E140, E141, E142, E143, E144, E146, E148, E149, E150, E151, E152, E153, E154, E156, E157, E158, E159, E160, E164, E168, E169, E170, E172, E173, E174, E175, E176, E178, E180, E182, E183, E185, E186, E191, E192, E193, E195, E196, E199, E200, E201, E202, E203, E204, E205, E208, E211, E212, E214, E219, E220, E221, E222, E223, E226, E227, E229, E232, E233, E235, E238, E239, E241, E243, E244, E245, E246, E247, E250, E253, E255, E256, E257, E258, E259, E260, E261, E262, E264, E266, E267, E269, E270, E272, E276, E280, E283, E285, E289, E291, E295, E297, E303, E309, E312, E314, E321, E324, E332, E341, E342, E395, E445, E469, E479, E483, E485, E487, E493, E505, E517, E532, E536, E542, E543, E547, E549, E351, E354, E356, E561, E571, E573, E574, E575, E578, E593,

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- Object to option 3, there is no need for new settlements / they don't work / focus on brownfield sites / avoid greenfield development – **90 comments** (C3, C29, C35, C59, C69, C74, C79, C96, C102, C451, E18, E27, E38, E39, E43, E60, E61, E62, E66, E72, E78, E82, E83, E84, E89, E90, E92, E112, E121, E127, E130, E135, E147, E155, E161, E163, E177, E184, E206, E210, E231, E234, E268, E273, E284, E293, E294, E304, E507, E557, E560, E566, E567, E590, E615, E623, E625, E644, E645, E657, E660, E696, E709, E716, E730, E737, E749, E759, E783, E785, E800, E805, E815, E842, E861, E903, E957, E959, E1020, E1024, E1035, E1039, E1083, E1084, E1095, E1097, E1139, E1148, E1171, L7)
- Object to development south-west of Winchester (Royaldown, South Winchester Golf Club, etc) for various reason including not needed, unsuitable location, loss of undeveloped gap between Winchester and Hursley, impact on local environment, lack of transport/infrastructure, etc – **52 comments** (C19, C73, C158, C161, C177, C209, C326, C380, C403, C497, C581, E171, E216, E252, E279, E287, E288, E320, E504, E571, E612, E672, E675, E677, E683, E694, E713, E715, E718, E763, E831, E859, E860, E933, E963, E967, E990, E1014, E1019, E1104, E1160, E1167, E1196, L5, L25, L47, L48, H29, H78, H108, H116, H124)
- Object to option 3, new settlements will have a harmful / larger environmental impact, cause urban sprawl, loss of countryside, greenspace, etc – **49 comments** (C7, C54, C69, C74, C78, C89, C115, C125, C127, C150, C153, C164, C171, C206, C291, E100, E181, E194, E197, E207, E225, E230, E236, E251, E265, E277, E290, E570, E614, E627, E631, E663, E703, E822, E824, E837, E872, E894, E906, E945, E1039, E1058, E1072, E1080, E1130, E1142, E1143, E1197, E1204)
- Existing larger settlements have the infrastructure to expand without creating new settlements – **5 comments** (C70, C71, C81, C149, C170)
- This option would be too long term / expensive / generates travel – **4 comments** (C42, C54, C81, C113)

- Risk to delivery of focussing on one location, possibly leading to unplanned development elsewhere, reduced affordable housing / facilities / harm to viability of existing settlements – **2 comments** (C291, E1230)
- Option 3 would limit small/medium sized developments in the rest of the district and may be slow to deliver, threatening 5-year land supply – **2 comments** (E678, C597)
- This is the most unsustainable, carbon intensive, profligate option and large-scale greenfield development should be resisted, be it Micheldever, Royaldown or in the southern parishes. Oppose the prospect of ‘Strategic Development Opportunity Areas’ which are being assessed by PfSH. The 1,700 houses under this option would fall into what is now the MTRA area – **1 comment** (E1244)

Summary of other comments on Approach 3:

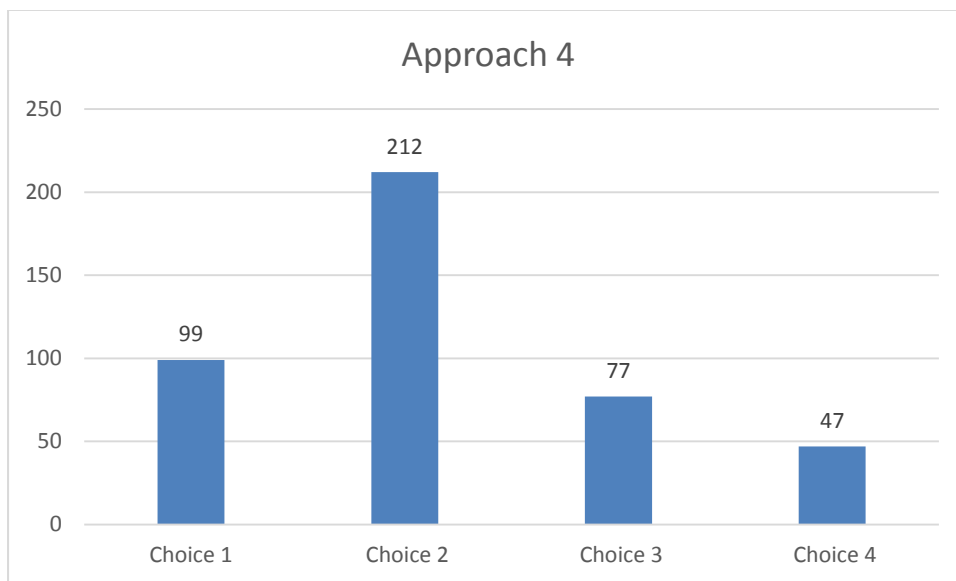
- A new town option should only be considered if housing needs cannot be met elsewhere – **3 comments** (C75, C106, E1118)
- Work with developers to see if there is capacity in the existing strategic sites, e.g. Barton Farm – **1 comment** (C260)
- Maybe best for market towns but difficult to find a suitable location and would increase travel – **1 comment** (C27)
- Option 3 could be attractive if a site of suitable size were available, large sites to the north and south-west of Winchester (Option 2) would be preferable – **1 comment** (C168)
- Agree with Micheldever Station proposal so long as adequate facilities and infrastructure are provided, which is doubtful – **1 comment** (C508)
- Option 3 would deliver housing at a slow rate causing housing delivery and land supply shortfalls and would limit the housing allocated to Winchester – **1 comment** (E1149)
- Would not be satisfactory if lead by developers – **1 comment** (C47)
- Approach 3 can be justified if thought out properly with design for sustainability and non-car-based connectivity – **1 comment** (E1182)
- Do not know enough to comment with certainty, on the face of it this option does not score well when assessed for sustainability – **1 comment** (E1218)
- New settlements of 5000+ dwellings could support bus services in the longer term. Engagement with bus operators is essential to facilitate commercial bus operation in the medium/long term after initial ‘pump priming’ using S106 funds – **1 comment** (E1211)

1.15 The ‘free text’ comments on Approach 3 suggest that the limited support for this approach is primarily on the basis that it may avoid development in existing settlements and that it is potentially a sustainable approach. The support for new settlements in specific locations (Micheldever Station or south-west of Winchester) comes mainly from their promoters.

- 1.16 There was a very large scale of objection to Approach 3 and in summarising the responses an attempt has been made to distinguish between those that opposed new settlements in principle and those that objected to specific new settlement locations. Where a response specifically mentioned a location (Micheldever Station or south-west of Winchester/Royaldown), or clearly alluded to these areas, it is summarised as objecting to that proposal. Where it referred to new settlements, but not a specific location, it is summarised as an 'in principle' objection to new settlements. In practice, some of the 'in principle' objections may have been prompted by specific proposals.
- 1.17 It should be noted that the Strategic Issues and Priorities document itself did not refer to any specific potential location for new settlements or strategic allocations. This was done deliberately in order to try to avoid site-specific comments, to avoid giving the impression that sites had been assessed in detail (which they had not), and because the concurrent 'call for sites' may add (or exclude) some potential sites. Nevertheless, there were well known and publicised locations promoted by landowners/developers at Micheldever Station and 'Royaldown'/south-west of Winchester.
- 1.18 The 'in principle' objections to new settlements were divided into those that appeared to be mainly on the basis that new settlements are not needed, don't tend to work well or that development should focus on brownfield not greenfield land (90 comments) and those that considered new settlements to be a more harmful option than others, particularly due to their greater perceived impact and damage (49 comments). There were also a number of comments opposing new settlements because of the perceived cost/risk to delivery of concentrating development in a single large allocation, and objecting because it was felt this approach would limit (or cause) growth in other settlements.
- 1.19 There were also a very large number of comments objecting to the two well-known potential locations for new settlements/strategic allocations; Micheldever Station (373 comments) and 'Royaldown/south-west of Winchester (52 comments). In addition, many (but not all) of the responses promoting a '5th option' (see below, 355 comments) opposed 'substantial sprawl through Oliver's Battery to Hursley and Compton', which is taken as opposition to strategic-scale growth south-west of Winchester.
- 1.20 There are a series of other comments on Approach 3 which neither specifically support nor oppose this Approach. Some of these say that new settlements should only be developed if housing needs cannot be met elsewhere or expressing doubt that there would be suitable sites. Some may support this option if there were adequate facilities, infrastructure or design, whilst others raise concerns about deliverability. A bus operator comments that bus services could be provided with adequate planning and funding.
- 1.21 Overall, Approach 3 received substantial objection, both in principle, but more particularly in relation to the potential locations that had been promoted by landowners/developers. The limited support that there was came mainly from

those promoting the sites or from people wanting to limit development in existing settlements elsewhere. While some respondents felt that new settlements could potentially provide a sustainable form of development, these were greatly outnumbered by those that viewed them as unsustainable or unnecessary.

Approach 4: A strategy of dispersing development around the district largely in proportion to the size of existing settlements



1.22 The table above shows that Approach 4 (a strategy of dispersing development around the district largely in proportion to the size of existing settlements) was fairly well supported. The detailed scoring shows the largest number of people (212) scored this as their 2nd choice, although a significant number (99) did select it as their 'most preferred' approach (Choice 1). Relatively few people (47) scored it as the 'worst approach' with rather more (77) considering it their 2nd worst option (3rd choice).

Summary of comments supporting / preferring Approach 4:

- Support option 4 as the most sustainable strategy / provides for local needs / fairest / shares the pain – **5 comments** (C84, E92, E1116, E1137, E1182)
- All areas need some growth to allow young people to stay in the area / provide vitality – **4 comments** (C10, C15, C113, E1058)
- Support options 1 and 4 which can deliver sustainable growth, market and affordable housing, and improved local services – **5 comments** (E678, E1072, E1080, E1230, E1241)

- The second most preferred option (after option 1), a sensible way of spreading development without big impacts on one or two places and helping rural services – **2 comments** (C206, C291)
- This approach would allow residents to remain in the area and provide housing in proportion to settlements. South Wonston has good facilities and could benefit from growth – **2 comments** (C597, E586)
- Smaller sites can make an important contribution to meeting local housing need (promotes a specific site in Swanmore) – **1 comment** (C80)
- This option would distribute organic development around the settlements, hopefully including brownfield sites – **1 comment** (E225)

Summary of comments objecting / not supporting Approach 4:

- Scattered development would not be sustainable – **4 comments** (C42, E954, E960, E1204)
- Object to option 4 due to impact on rural area / constraints on villages / use brownfield land instead – **4 comments** (E1009, E1020, E1133, E1216)
- The worst option with no evidence that the advantages would be achieved – **2 comments** (C160, C168)
- The least sustainable option as journey frequency and length would increase, contrary to climate aims – **2 comments** (C27, E648)
- There should be no additional building in rural areas – **1 comment** (C24)
- Villages are being swamped by new development, putting pressure on services – **1 comment** (C17)
- If development is in proportion to the size of existing settlements they will outgrow their character, only support minor infill – **1 comment** (C101)
- Unable to score this option 4 online – **1 comment** (C43)

Summary of other comments on Approach 4:

- Support the higher level of growth for the market towns and rural area under this option but other options for growth of the larger settlements (such as Bishops Waltham, Kings Worthy) should be assessed – **2 comments** (E1051, E1069)
- There should be combination of approaches 2 and 4 allowing for housing in Winchester and smaller villages in the north of the district such as Sutton Scotney – **2 comments** (E1082, E1114)
- Support the higher level of growth for the market towns and rural area under this option but this is too small and the larger settlements such as Wickham should have other options for growth – (E1005)
- Support the higher level of growth for the market towns but there should be a hybrid option which gives priority to Winchester Town then focusses on settlements close to established urban areas within and adjoining the district, such as Denmead – **1 comment** (E1055)

- There should be a higher level of housing allocated to the rural settlements such as Denmead and Wickham, where it would provide benefits and not breach planning constraints – **1 comment** (E1118)
- Prefer Option 4 but it needs to decide on a transport corridor and whether homes could expand along that route, which could improve sustainability of smaller sites for employment and access to facilities – **1 comment** (C586)
- This Option would result in insufficient housing at Winchester to realise the sustainability benefits and strengths of developing at Winchester – **1 comment** (E1149)
- Do not know enough to comment with certainty, on the face of it this option does not score well when assessed for sustainability – **1 comment** (E1218)
- Hard to evaluate this option without data on demography and population of the component parts of the district, but it seems to allocate less to Winchester Town (would expect in the region of 5,000 dwellings) – **1 comment** (E1244)

- 1.23 The 'free text' comments on Approach 4 suggest that the support is primarily on the basis that this approach would support the rural settlements in terms of maintaining local facilities and services and providing market and affordable housing to meet local needs. It was also considered by some the fairest distribution or that it would 'share the pain' of development.
- 1.24 Most of the respondents objecting to Approach 4 were concerned that it would not be sustainable and would encourage car journeys, or that it would be harmful to the character of the rural area/settlements. Some were opposed to further development in the rural area due to its impact on the character of settlements, or commented on the perceived harmful effects of recent development.
- 1.25 There are a series of comments on Approach 4 which neither specifically support nor oppose this Approach. Many of these were from development interests who generally supported more development in the rural settlements but wished to increase the level of housing in villages where they promoted sites. There were some concerns expressed about the sustainability of this approach or the limited scale of development in Winchester, with another mentioning the potential sustainability of public transport corridors.
- 1.26 Overall, Approach 4 was well supported, albeit that more respondents scored it as their 2nd choice rather than their preferred approach. Those supporting it felt that it would benefit the rural settlements by helping to maintain facilities and services and providing housing for local needs. Several of the comments from development interests were generally supportive but sought increased housing requirements in locations where they were promoting a site. On the other hand, there was concern about whether this was a sustainable approach in terms of travel, as well as its potential impact on the character of the rural settlements.

2. Alternative Approaches – Summary of Responses

Have we identified all of the possible approaches – are there any missing that we have not considered?

- 2.1 This question provided the opportunity for people to suggest alternative approaches or to explain the ranking they had given. Those comments which relate to the four Approaches that were consulted on are summarised in section 1 above. The following sections summarise the comments made about other possible alternative approaches or on other matters related to housing. Comments on Homes for All question 2 (housing needs, affordable housing) are considered in a separate report.

Proposed Development Strategy

- It may be best to combine some approaches – **3 comments** (C462, C536, E1218)
- There should be a ‘hybrid’ of Options 1 and 4 – **2 comments** (C383, C515)
- A blending of some options (1, 2 and 4) would be the most effective approach, with growth apportioned on the basis of sustainability and potential to enhance rural communities – **2 comments** (E1123, E1124)
- Options 1 and 2 are the most appropriate and option 3 the least – **2 comments** (E570, E785)
- Combine options 1 and 2, expanding villages that act as satellites to the city where sustainable transport links are available, or could be made available – **1 comment** (C323)
- The best solution is a compromise between option 2 and 3, regenerate city centres and then focus any remaining development where it does not impact existing villages or small market towns – **1 comment** (C561)
- The most sustainable strategy would include a hybrid of Option 3 and Option 1 or 2 to allow housing to be brought forward continually over the plan period with allocations at existing sustainable settlements in the shorter term and strategic development over the longer term – **1 comment** (E1162)
- All four approaches could be applied to different parts of the district at different times, focussing on a single approach may not be the best way forward. It looks like a north-south choice based on which developer can get to the start line first and offer the most benefits – **1 comment** (E1228)
- Once the principles are clear, each of the options has elements which could be combined – **1 comment** (C258)
- Can’t see much difference between options 1, 2, and 4, so not ranked them – **1 comment** (C57)
- The options are misleading because options 1 to 3 propose unrealistically low levels of development in the market towns and rural area with only option 4 proposing significant development, whereas the requirements for Winchester are significant under all options – **1 comment** (E1118)
- Spread development proportionately / organically around existing settlements – **11 comments** (C2, C6, C12, C25, C39, C74, C100, C117, C121, C528, E1245)

- Enlarge existing settlements / use brownfield land rather than greenfield – **10 comments** (C14, C22, C70, C106, C164, C190, C233, C234, C264, E1138)
- The strategy should be sufficiently flexible to maintain delivery across the plan period by allocating a wide diversity of sites in terms of size and location – **6 comments** (E1060, E1072, E1138, E1144, E1149, E1225)
- Support small amounts of development in the smaller settlements – **2 comments** (C5, C63)
- Rural areas are losing their character/green space/biodiversity, developing existing settlements or starting from scratch would be more sustainable – **1 comment** (C176)
- The impact of development on neighbouring settlements needs to be considered and sites of environmental importance should be protected, especially in the SDNP – **1 comment** (E1245)
- Develop sites close to transport hubs such as Whiteley and Waterlooville – **1 comment** (C234)
- Support development being distributed to the most sustainable settlements, but the role of market towns and rural areas should be recognised, particularly those with strong connections to sustainable locations. Settlement boundaries should be reviewed with a more flexible approach – **1 comment** (E1179)
- Need consideration of how any new housing sites will connect to Southampton as the region's largest economic hub, particularly if option 3 is chosen. Research should be undertaken on the impacts of a large new settlement on commuter flows and transport networks to prevent adverse effects – **1 comment** (E1220)
- Build in less desirable / overcrowded areas – **1 comment** (C48)
- Would object to the development of sites at Crawley included in the SHELAA due to the impact on the countryside, etc – **1 comment** (C474)
- Housing should be considered in the SD National Park or the quota of housing for villages like Swanmore should be reduced – **1 comment** (H107)
- If there are over 1000 houses planned for Swanmore why was there so little publicity of the potential impact – **1 comment** (M18)
- The consultation does not propose 1000 dwellings for Swanmore and the SHELAA will be subject to a separate consultation – **1 comment** (H14)
- Development should be in South Hampshire with Market towns and villages only growing to satisfy local needs – **1 comment** (E343)
- The most important considerations are climate change, poverty and the nature crisis – **1 comment** (C11)
- Identify those options that reduce emissions by the greatest amount – **1 comment** (C343)
- Need a focus on "livability" in new development, with small scale development, "work at home", with access to services without long distance travel – **1 comment** (C194)
- Highways England do not offer a view on the housing growth options but seek to be consulted on any studies that may be being prepared in relation to transport infrastructure – **1 comment** (E1212)

- What criteria will be used to determine the development strategy and allocation of sites, look forward to later stages with interest – **1 comment** (C23)
 - The plan seems unduly complicated and should a proper map indicating the specific and relevant proposals for housing, not what could take place – **1 comment** (H122)
 - Set out assumptions for development not a bureaucratic and opaque hierarchy – **1 comment** (C356)
 - More background information is needed to make a choice – **1 comment** (C114)
- 2.2 Several responses suggest various hybrid or blended approaches to the options, or that a combination of some elements of several options should be used. There is no consensus on which elements of which approaches should be combined though. There is some support for spreading development around existing settlements or enlarging existing settlements, implying more development in the smaller settlements, although some of the proposed approaches would do this to an extent. Several development interests suggest the need for a diversity of sites so as to maintain housing delivery.
- 2.3 There are various suggestions that development should (or should not) be promoted in different locations, but again no consensus on which these should be. Some respondents suggest criteria for determining the development strategy, particularly climate change issues, while others want more information before giving a view, or to see firm proposals. Overall, these responses set out a variety of views but reach no clear conclusion. They are noted and will be taken into account when this issue is considered in more detail in section 3 below.

Potential 5th Option

- The boundaries of the 4 options are not clearly defined and they do not make best use of previously developed land/imply substantial sprawl through Oliver's Battery to Hursley and Compton. Support a 5th option which uses the existing supply of housing (11,000 dwellings), prioritises brownfield sites such as Sir John Moore Barracks / Bushfield Camp, redevelops the City Centre, develops parts of the South Hampshire urban areas, allows small developments in the market towns/villages including the National Park, would be the best option to support a Green Belt – **355 comments** (C19, C35, C40, C97, C98, C110, C112, C119, C120, C122, C133, C140, C141, C143, C144, C145, C147, C148, C151, C152, C155, C162, C166, C172, C180, C181, C184, C192, C198, C214, C215, C217, C226, C231, C233, C235, C237, C240, C241, C242, C245, C246, C248, C253, C254, C255, C261, C262, C263, C268, C269, C273, C274, C275, C279, C280, C286, C291, C297, C299, C304, C305, C311, C314, C325, C327, C330, C331, C332, C336, C338, C339, C342, C347, C348, C351, C352, C361, C364, C372, C376, C377, C378, C382, C388, C389, C392, C393, C397, C399, C400, C401, C402, C403, C404, C407, C408, C409, C411, C412, C417, C421, C429, C430, C432, C433, C435, C439, C441, C443, C445, C449, C450, C461, C463, C464, C467,

C469, C470, C471, C473, C476, C478, C481, C485, C486, C487, C488, C494, C496, C497, C498, C510, C511, C513, C517, C518, C551, C553, C554, C558, C562, C567, C568, C569, C573, C575, C577, C579, C588, C603, E85, E87, E95, E97, E102, E105, E110, E119, E165, E167, E187, E228, E240, E242, E248, E249, E254, E278, E282, E286, E292, E299, E311, E322, E330, E331, E333, E335, E344, E368, E373, E389, E399, E454, E499, E514, E528, E546, E563, E572, E577, E583, E595, E605, E619, E636, E649, E658, E685, E702, E705, E727, E733, E736, E741, E745, E775, E789, E827, E833, E840, E843, E845, E877, E882, E886, E887, E888, E889, E890, E892, E893, E895, E897, E898, E900, E901, E902, E907, E909, E910, E911, E912, E913, E914, E915, E916, E917, E919, E920, E921, E923, E925, E926, E927, E928, E929, E930, E931, E938, E939, E942, E944, E946, E947, E950, E953, E955, E956, E961, E964, E966, E969, E970, E971, E973, E974, E976, E977, E978, E979, E980, E983, E986, E987, E992, E993, E995, E996, E999, E1001, E1002, E1003, E1004, E1006, E1007, E1010, E1013, E1016, E1017, E1022, E1023, E1025, E1029, E1030, E1031, E1033, E1034, E1042, E1043, E1044, E1048, E1052, E1059, E1061, E1063, E1075, E1076, E1086, E1087, E1091, E1093, E1094, E1096, E1109, E1112, E1117, E1122, E1125, E1132, E1135, E1136, E1140, E1141, E1145, E1146, E1150, E1153, E1154, E1155, E1157, E1158, E1159, E1166, E1169, E1173, E1176, E1178, E1181, E1186, E1188, E1189, E1191, E1192, E1193, E1194, E1200, E1202, E1205, E1206, E1209, E1221, E1230, E1232, E1244, L6, L10, L12, L17, L20, L27, L49, L50, L51, L53)

- Support an Option 5 which takes the best parts of the existing options and prioritises brownfield sites – **5 comments** (C88, C126, C130, C135, C319)

- 2.4 A large number of responses did not support the four Approaches proposed in the Strategic Issues and Priorities consultation and suggested a 5th approach. Many of these comments consisted of a standard response which was available on the Save South Winchester Campaign Group (SSWCG) web site. Some respondents used parts of the SSWCG response while others added to it. The summaries above include all those responses which either refer to a 5th option or which reproduce all/parts of the SSWCG alternative, even if they do not specifically promote all the elements. A few comments refer to taking the best parts of the existing options (rather than opposing them) to develop an option 5.
- 2.5 Given its origins, the '5th option' promoters are opposed to major development to the south/south-west of Winchester, particularly 'Royaldown'. Therefore, many of the responses summarised above either specifically or implicitly oppose Royaldown (see comments on Approach 3 in section 1 above) or other major development south-west of Winchester. However, not all comments specifically mentioned development in this area, with some referring to certain elements of the '5th option' but not all of them.
- 2.6 Unlike the 4 Approaches set out in the Strategic Issues and Priorities consultation document, the '5th option' does not propose a spatial development strategy or distribution of housing between various parts of the

district. As such it is not a direct alternative to the 4 Approaches, but more of a series of principles which are promoted. Some of these could potentially be followed by some of the 4 Approaches, depending on which is selected. This is considered further in section 3 below.

The Housing Requirement / Standard Method

- The 'standard method' housing requirement is a minimum and the Council should consider planning for a high number to provide greater flexibility /substantial 'buffer' – **15 comments** (C515, E1005, E1051, E1069, E1082, E1114, E1116, E1121, E1123, E1124, E1128, E1138, E1144, E1162, E1225)
- WCC should plan to help meet the unmet needs of other authorities in South Hampshire and the housing target should be increased – **12 comments** (C315, C540, C597, E739, E1121, E1128, E1138, E1144, E1149, E1162, E1220, E1225)
- The Council should resist the assumed need for additional housing which is based on projections of population growth that may be incorrect – **3 comments** (C423, C574, L3)
- The plan period should start from submission of the Plan, not be backdated to 2018 – **3 comments** (E1005, E1069, E1128)
- It would be sensible to look beyond the suggested plan period of 2038 (to 2041 or later), especially if planning for strategic-scale development – **1 comment** (E1121)
- WCC should satisfy itself that the figure of 700dpa is appropriate and establish with the National Park Authority the scale of housing that should be located within the SDNP – **1 comment** (E1209)
- Look carefully at villages split by the National Park, balance housing between the areas with only the part outside being in housing development figures – **2 comments** C301, C302,
- The consultation is based on a 'standard method' requirement of 692 dwellings per annum but this has now reduced to 665 and is expected to continue to fall. Support the windfall study, which helps demonstrate the updated requirement can be met without needing large greenfield development, WCC should not be required to accommodate unmet needs from South Hampshire and the urban authorities should do better at regenerating their own areas – **2 comments** (C429, E1244)
- Only allow limited new development – **3 comments** (C162, C169, C290)
- Offset development by paying other areas to accept more housing – **2 comments** (C243, C244)
- The planning system has been stacked by central government to serve developers, local authorities should make a proper case for true housing need for those most in need of homes in the area – **1 comment** (E1182)
- Not sure, the national government strategy is sustainable or appropriate, building on the beautiful, historic fields only detracts from the area and makes it more unhealthy – **1 comment** (C398)
- Don't build more houses, the population of the UK will fall after 2040 and there will be empty units in years to come – **1 comment** (C539)

- The "levelling up" agenda suggests that more development should occur in the north of the country, where there may be surplus properties or more opportunity to develop – **1 comment** (C549)
 - The policy of boosting the Winchester economy with unaffordable and excess development is dire given our environmental stress in the UK – **1 comment** (E1008)
 - The SDNP should be included in the standard method requirement and help to meet it, but the requirement should not be inflated as a result of higher housing prices in the National Park – **1 comment** (E1244)
 - Object to the prospect of accommodating thousands of new homes from Fareham – **1 comment** (L28)
 - No more development, focus on getting the most out of what we have – **1 comment** (C393)
 - All sites relied on to deliver the district's housing requirement should be critically reviewed to determine developability and deliverability in the plan period – **1 comment** (E1121)
 - Transport structure is not adequate for ever increasing housing numbers and should be the starting point for any future changes – **1 comment** (H111)
- 2.7 Various development interests comment that the 'standard method' is a minimum requirement, that the Council should consider planning for a higher number, and that Winchester should plan to help meet the unmet needs in South Hampshire. On the other hand, several respondents criticise the Government's standard method, point out that it has recently reduced, or suggest that the Council should not be required to help meet unmet needs. There are also some suggestions concerning the relationship with the South Downs National Park and that housing should be resisted for various reasons, or directed elsewhere.
- 2.8 There is considerable Government advice and requirements around housing provision and the 'Duty to Cooperate' in helping meet the unmet needs of neighbouring authorities. These will be tested through the Local Plan examination process and it is important that the Council's approach is robust enough to satisfy a Planning Inspector. There also remains uncertainty about the scale of housing needed, as the standard method calculation can change annually and the Government has proposed other changes. These issues are considered in more detail in section 3 below.

Use of Brownfield / Windfall Sites

- Use brownfield sites first/more / use vacant commercial sites in the town centre / don't develop greenfield sites – **89 comments** (C32, C35, C44, C69, C87, C88, C93, C99, C154, C158, C159, C164, C167, C174, C178, C188, C189, C228, C239, C247, C272, C285, C287, C303, C307, C308, C310, C313, C317, C318, C328, C342, C345, C357, C359, C363, C366, C375, C391, C403, C404, C406, C414, C415, C420, C423, C453, C469, C482, C489, C497, C521, C531, C538, C560, C580, C581, C595, C596, E156,

E271, E354, E675, E677, E701, E763, E838, E937, E990, E1007, E1074, E1102, E1133, E1164, E1218, E1224, E1233, E1242, L3, L25, M14, H7, H12, H19, H108, H109, H111, H116, H124)

- Focus on higher density / taller but well-considered development – **7 comments** (C259, C306, C346, C430, E1198, E1218, E1224)
- It should be more difficult for developers to develop greenfield sites with a tax on developers profits on these sites – **1 comment** (C282)
- It is not enough to rely on the SHELAA to identify potential sites, there should be an Urban Opportunities Study to maximise the use of brownfield land such as some car parks in central Winchester – **1 comment** (E1244)
- WCC should identify previously developed land on a proactive basis and select a blend of types of sites rather than a single large development – **1 comment** (C588)
- Windfall sites can provide a useful contribution housing needs – **1 comment** (C559)
- Existing developed areas such as Winchester Village and Barton Farm should be fully exploited before anything else is developed – **1 comment** (C195)
- Crack down on empty houses – **1 comment** (C93)
- It seems too easy to put up large areas of housing with large footprints, why not more underground parking – **1 comment** (C124)
- Build only near railway stations – **1 comment** (C436)
- Encouraging and supporting individuals to build on their own land or redevelop brownfield land would encourage thoughtful, sustainable development – **1 comment** (C370)
- Brownfield development will not provide sufficient housing and leads to overcrowded development e.g. Chilbolton Avenue and The Valley – **1 comment** (E190)

2.9 Many responses wish to see greater use of brownfield sites and/or less use of greenfield land. Various suggestions are made about where/how this could be achieved, with the use of vacant town centre sites or commercial units commonly being mentioned. Some respondents suggest the need for higher density development or a more proactive assessment of previously developed land / urban capacity, or that the use of car parks or other urban land could increase capacity. Another respondent expresses concerns about brownfield development leading to overcrowding.

2.10 As well as the comments above, the use of brownfield land forms a key element of the '5th option' promoted by a large number of people (355 comments). The Council has produced an updated Windfall Assessment which concludes that windfall sites (most of which are previously developed) will make a greater contribution to housing supply than previously estimated, but it is necessary for any windfall allowance to be robust. In addition, many of the existing housing commitments, especially smaller sites, are on previously developed land. This issue is considered in more detail in section 3 below.

Type of Sites / Development

- Support the use of small-scale sites / don't support large-scale development, – **16 comments** (C16, C33, C157, C159, C202, C306, C307, C308, C310, C319, C359, C415, C420, C531, C596, E1224)
 - Need environmentally sustainable housing, not dated oversized developments – **1 comment** (E932)
 - Should not rely just on SHELAA sites, consider publicly owned land – **1 comment** (C47)
 - Lobby the government to release public land no longer required by the MOD – **1 comment** (C491)
 - The Modernising Our Health and Hospitals Services Programme could result in surplus land and buildings during the Local Plan period which may be suited to residential, education or commercial use – **1 comment** (E1099)
 - New housing should be as environmentally beneficial as possible to include renewable energy, bat/bird bricks, etc – **1 comment** (H53)
 - Developments should include the requirements of wildlife, be built with eco features and be ethical for the future of the planet – **1 comment** (H59)
 - Good Design is very important – **1 comment** (C548)
 - New developments should protect and promoting villages' individual characters, incorporating vernacular architecture, creating liveable developments – **1 comment** (H8)
 - It is critical that sufficient funding and land is secured through planning obligations to enable additional school places to be delivered through negotiations with developers to secure funding for new/extended schools via section 106 agreements – **1 comment** (E1238)
 - The assumption that even large urban extensions, much less new settlements, can support a meaningful bus operation is regrettably still within NPPF, despite being unfounded – **1 comment** (E1211)
 - Encourage major employers in Winchester to provide housing for employees – **1 comment** (E1199)
 - Too many small door frames – **1 comment** (M10)
- 2.11 There is significant support for small-scale developments, or against large-scale developments, and some support for using publically-owned land or sites not promoted through the SHELAA. Several respondents also refer to the desirability of environmentally sustainable housing, good design, or infrastructure.
- 2.12 Small sites are an important element of housing supply and an updated Windfall Assessment has recently been carried out which assessed their past contribution and expected future supply. These comments will be taken into account in considering the spatial development strategy for the Local Plan. Other parts of the Strategic Issues and Priorities consultation document asked about sustainability issues, sustainable construction and infrastructure, so these matters are considered there.

Location of Development / Protection

- Promote land for development through the SHELAA at the following locations, this should be allocated for development:
 - land north of Winchester – **2 comments** (E1121, E1144)
 - land south-west of Winchester – **2 comments** (C515, E1149)
 - land at Sir John Moore Barracks, Winchester – **1 comment** (E1092)
 - land west of Headbourne Worthy – **2 comments** (E1072, E1080)
 - land west of Littleton – **2 comments** (C323, E1179)
 - land north of Wickham – **2 comments** (E1005, E1123)
 - land west of Wickham – **1 comment** (C515)
 - land north of Bishops Waltham – **1 comment** (E1051)
 - land at South Wonston – **1 comment** (E1058)
 - land south of Kings Worthy – **1 comment** (E1069)
 - land north of Sutton Scotney – **1 comment** (E1082)
 - land east of Otterbourne – **1 comment** (E1116)
 - land west of Alresford – **1 comment** (E1124)
 - land east of Waltham Chase – **1 comment** (E1137)
 - North Whiteley is providing substantial new infrastructure and additional development should be considered here so that residents can benefit from this – **2 comments** (E678, H1)
 - Housing is disproportionately focussed on South Hampshire and the additional housing should provide for Winchester's needs – **1 comment** (E739)
 - Land at Greenwood Lane, Durley should be retained as a wildlife area, oppose development that would threaten this – **1 comment** (E263)
 - The proposed re-development of Sir John Moore Barracks would triple the population of Littleton and damage extensive green open spaces. The Parish Council needs to be involved in the discussions – **1 comment** (E1228)
 - The options should offer protection to Compton, Olivers Battery and Hursley – **1 comment** (C66)
 - Lack of public transport in rural areas makes them a poor choice for significant housing, any housing in Old Alresford should be small scale and to meet local needs – **1 comment** (E1234)
 - Would welcome discussions with the South Downs National Park Authority on potential sites, having regard to the need to consider impacts on designated landscapes – **1 comment** (C541)
 - The whole district needs to be assessed taking into account environmental and infrastructure considerations and the practicality of house prices – **1 comment** (C598)
- 2.13 Various site promoters have submitted representations seeking the allocation of their sites. These will be assessed through the Strategic Housing and Employment Land Availability Assessment (SHELAA) and through later stages of developing the draft Local Plan. At this stage the priority is on selecting the appropriate development strategy, although the availability of the sites promoted through the SHELAA is noted. In many cases detailed reports were submitted promoting the sites but these are not summarised here.

Where comments were made in addition to site promotion (e.g. housing numbers, strategy, etc) they have been summarised in the relevant sections above. Several respondents have sought to avoid development in particular areas, which is similarly a matter for the later stages of developing the draft Local Plan.

- 2.14 The confirmation by the South Downs National Park Authority that it would welcome discussions on potential sites is helpful and will be followed up.

Green Infrastructure / Spaces

- There should be a Green Belt / this should be the main priority – **22 comments** (C35, C158, C159, C234, C247, C272, C306, C307, C310, C497, C531, E557, E672, E675, E677, E684, E694, E713, E859, E1026, E1164, H109)
 - Need to preserve green space / wildlife / recreation sites / settlement gaps – **13 comments** (C33, C35, C73, C174, C247, E503, C556, E701, H93, H98, H107, H108, H109)
 - There should be good access to green and blue infrastructure as well as services and facilities – **2 comments** (C536, H72)
 - All developments should have a 'biodiverse' area, include growing space, edible landscapes and pollution absorbing bushes, be within 15 minutes of food shops and be large enough for home working – **2 comments** (C516, C535)
 - Need to maintain a gap between Wickham / Knowle and Welborne to retain its separate identity – **2 comments** (E937, E1074)
 - A thread running through all approaches should provision of open space, when was the last public park created? – **1 comment** (C493)
 - Want to submit reports on the Ecology and Environment of Flowerdown and secondly and on Flowerdown Brownfield and non-Brownfield/Greenfield areas that could be developed – **1 comment** (H37)
- 2.15 There was a separate series of questions about countryside protection, including the possibility of a Green Belt, elsewhere in the Strategic Issues and Priorities consultation document, as well as topics on biodiversity, natural environment and living well. Representations relating to Green Belt, green infrastructure, open space, etc will be considered in relation to the relevant sections on those topics. Both Green Belt (if it is justified) and settlement gaps could only be defined once the development requirements and strategy are determined and adequate provision is made for future growth. These will be considered at the appropriate stage but the current priority is to devise the development strategy for the Local Plan.

The Consultation Process

- The questionnaire is written to achieve a particular answer, the big issue is population growth so new houses are needed across the UK including Winchester – **1 comment** (C64)

- Will you take any notice anyway, this is just a tick box exercise – **1 comment** (C576)
- Have completed the survey but doubt you will take any notice as it goes against your policy of developing greenfield sites – **1 comment** (M11)

2.16 It is unfortunate that a few respondents do not think the Council will take notice of the consultation exercise as the Council has put much effort into trying to achieve a broad consultation and a very large number of people have taken the trouble to respond. All the responses are appreciated, but show that there is not a clear consensus on most issues, so it is impossible to develop a Plan that would satisfy everyone. However, account will be taken of the substantial number of comments received, alongside the evidence base and the requirements of Government policy.

Other Comments

- I am not a qualified town planner, I form my views on the situations I find around me – **1 comment** (C216)
- The likelihood of covering all bases this far in advance is very unlikely – **1 comment** (C500)
- The lack of a spatial plan shows up along Chilbolton Avenue where individual plots have been developed in isolation with no interconnectivity. The Local Plan process has focused on providing parameters for developers to deliver housing and fails to identify opportunities and sites that are in social ownership when considering the requirement for new homes – **1 comment** (E1253)

2.17 These comments are noted.

3. Assessment of the Key Issues

- 3.1 As well as indicating people's preferences on the four Approaches that were contained in the Strategic Issues and Priorities consultation, the summary above shows that there were 'free text' comments on many other issues. This section considers the key issues that were raised and sets out a recommended way forward in terms of developing the Local Plan housing strategy.

The Housing Requirement

- 3.2 The first stage in developing the housing strategy is to determine the amount of housing that needs to be provided over the Local Plan period. Government has introduced the 'standard method' which should be used to produce the 'local housing need assessment' at a district-wide level. The National Planning Policy Framework (NPPF) is clear that the standard method should be used to determine the minimum housing need unless there are exceptional circumstances to justify an alternative approach (NPPF paragraph 61).
- 3.3 The standard method produces a figure for the unconstrained housing need in the area ('policy-off'), but this is not necessarily the housing requirement figure for the Local Plan. The NPPF (paragraphs 11 and 61) and Planning Practice Guidance (PPG) is clear that the standard method produces the minimum housing need figure that should be planned for and that it may need to be increased, for example to accommodate the unmet needs of neighbouring authorities. Once site availability is assessed it may also prove not to be achievable, for example where any adverse impacts of doing so would significantly and demonstrably outweigh the benefits (NPPF paragraph 11).
- 3.4 But the first step is to establish the unconstrained housing need and most respondents accept that the standard method should be used, although some criticise it. Few respondents suggest that the Council should try to demonstrate 'exceptional circumstances' so as to develop its own housing need figure. To adopt this approach would require substantial assessment and justification of local housing need and could be expected to be subject to extensive challenge and testing through the Local Plan examination (which is not the case if the standard method is used). Even if this were thought to be justified, the result may not be significantly different from the standard methodology. Therefore, it is concluded that the Council should use the standard method as the starting point for determining district housing need, as expected by Government advice.
- 3.5 Various development interests comment that the standard methodology is a minimum requirement, that the Council should consider planning for a higher number. Planning Practice Guidance (PPG) identifies several examples of where it may be appropriate to plan for a higher figure:

- Where there are deliverable growth strategies and funding in place;
- Where there are strategic infrastructure improvements; or
- To take on unmet need from neighbouring authorities.

- 3.6 The only one of these examples that is likely to be applicable in Winchester is the issue of helping to meet the unmet housing needs of other authorities. Not only is this referenced in Government advice, the Duty to Cooperate requires local authorities to take account of any needs that cannot be met by neighbouring authorities. Such needs are most likely to arise within southern Hampshire and the Partnership for South Hampshire (PfSH) is developing a Statement of Common Ground and updated Joint Strategy that will aim to identify the scale of any under-provision in the area and develop a strategy for meeting this. While some respondents argue that the Council should not be required to help meet unmet needs, there is a clear legislative requirement through the Duty to Cooperate to at least consider these needs. This applies whether or not the Council is part of PfSH or signs up to a future Joint Strategy.
- 3.7 Some development interests refer to adding a flexibility allowance or 'buffer' to the standard method figure, but this is not a requirement of Government advice. The NPPF requires a buffer (of 5%-20%) to be added when calculating 5-year land supply, but this is to be 'moved forward from later in the plan period', it is not added to the housing need/requirement. When considering housing land supply to meet the identified need, there may be a case for adding a buffer, depending on the degree of certainty over deliverability. Given the examples contained in the PPG and the level of uplift provided by the affordability multiplier (see below), it is concluded that the only justification to exceed the local housing need resulting from the standard method may be to help meet the needs of neighbouring authorities.
- 3.8 The standard method consists of a calculation which is based on future household projections and an 'affordability' multiplier. The Government has proposed changes to this but has confirmed that currently the 2014-based household projections should be used, with an affordability uplift based on a calculation that changes every 2 years. This last changed in March 2021, hence the comment from some respondents that the figure has reduced. At the time of drafting the Strategic Issues and Priorities document the standard method produced a district need of 692 dwellings per annum, so a rounded figure of 700 dwellings per annum was used for the four potential Approaches.
- 3.8 Using the current standard method calculation a local housing need of 665 dwellings per annum is produced. If there are no further changes to the methodology, the affordability uplift would next change in Spring 2023. According to the latest Development Plan Scheme the Local Plan would be submitted for examination in late 2023 and at this point the standard methodology could be fixed for a 2 year period. Therefore, the current need of 665 dwellings per annum is likely to change again before it can be fixed, when the Plan is submitted. In addition, the Government's 'The Future of

Planning' White Paper proposed more radical changes and the Government has not yet indicated whether/how/when these would be taken forward.

- 3.9 It is not possible to be certain what the standard method figure will be at the time the Local Plan is submitted, in late 2023 according to the latest Local Development Scheme, with adoption in 2024. In general the 2014 household projection element of the calculation (if retained) is likely to be slightly lower in 2023, but the affordability multiplier is more variable. Typically the affordability multiplier results in an addition of around 50% to the household projections, suggesting a standard method result in the range of 650-700 dwellings per annum. Bearing in mind the uncertainty about the scale of the standard method calculation at the time the Local Plan is submitted for examination, it is proposed that a housing need figure of 700 dwellings per annum should be used as the basis of the draft Local Plan.
- 3.10 The PfSH is developing a Statement of Common Ground to identify the scale of any shortfall although, as with the Winchester need, this will vary as the standard method changes. PfSH has also commissioned work to consider potential development strategies to meet South Hampshire's needs as a whole. This work is not yet complete so it is not possible to define the scale of any addition that may be sought to meet PfSH needs, if any, or how potential solutions may impact on Winchester District. Once the scale of any unmet need is clarified, and a strategy developed for dealing with it, the Council must consider this under the Duty to Cooperate.
- 3.11 The PfSH work should be sufficiently advanced to feed into the process of drafting the Local Plan. While the Council must 'consider' any unmet need, it is for it to decide how to address this in the Local Plan. However, failure to satisfy this Duty, assuming it remains, would lead to a planning Inspector finding the Local Plan unsound. Failure to satisfy the Duty to Cooperate cannot be overcome by making modifications to the Local Plan, it would require a more fundamental review.
- 3.12 The standard method produces an annual figure which would need to be applied over the Local Plan period. Some respondents suggest either that the Plan period should not be 'backdated' to 2018, or that it should extend beyond 2038. 2018 formed a logical start to the Plan period as it coincided with the introduction of the standard methodology and the expiry of 5 years from the adoption of the existing Local Plan (Part 1). Similarly a 20-year Plan period was sensible and allowed for at least 15 years after adoption, as advised in the NPPF. As the programme for adopting the Local Plan has been updated (see the updated Local Development Scheme, July 2021), it will be necessary to revise the Plan period to 2019- 2039, so as to maintain a 20 year Plan period whilst planning for 15 years from the expected adoption date of 2024.
- 3.13 The standard method gives a district-wide housing need figure, but the Local Plan will only cover that part of the district outside the South Downs National Park. Some respondents raise the issue of how the need will be apportioned between the National Park and the rest of the district. This will need to take

into account the requirement to conserve the National Park and its more limited housing supply. When the South Downs Local Plan was produced the authorities agreed a Statement of Common Ground which set out that the SDNP housing need within the district was about 31 dwellings per annum and that the Park was able to provide for about half of this (15 dwellings per annum). The standard method does not apply at the National Park level but, given the constraints in the Park area, it is unlikely that the National Park Authority will be able to contribute substantially to the Winchester District need. Discussions will need to be held with the Park Authority regarding the potential for development in the SDNP and whether 15 dwellings per annum remains a realistic level, but the Park Authority's comments are supportive of discussions on housing matters.

- 3.14 Conclusion: Government advice is clear that the standard method should be used to calculate housing need unless exceptional circumstances exist. There is uncertainty about what the standard method result will be at the time it can be fixed (on submission of the Plan) and, indeed, whether the Local Plan process itself will change. The current standard method result of 665 dwellings per annum is expected to change by the time the Local Plan is submitted for examination and if a shortfall is identified by the Partnership for South Hampshire this will also need to be considered. Given the uncertainty, it would be sensible to develop a strategy that would allow for some increase in Winchester's housing need, to 700 dwellings per annum, plus consideration of any PfSH shortfall. While the housing need is a district figure, there is likely to be limited supply within the South Downs National Park and the scale of this should be discussed further with the Park Authority.

Proposed Development Strategy

- 3.15 The responses indicate a clear preference for Approach 1, a development strategy based on distributing development to a sustainable hierarchy of settlements. There is some support for Approach 4 (dispersing development) but much less for Approach 2 (focus development on Winchester) and clear opposition to Approach 3 (strategic allocation(s) / new settlement).
- 3.16 Dealing with Approach 3 first, this has received high levels of opposition, both in principle and to the locations that promoters have put forward. The Strategic Issues and Priorities (SIP) document was careful not to identify potential locations so as to avoid site-specific objections or the impression that some locations had been endorsed by the Council. Despite this, the promotion of new settlements at Micheldever Station and 'Royaldown' by the respective landowners was well known and they received large-scale objection. There were clearly campaigns encouraging objections to both proposals, but what is perhaps equally striking is the lack of support for this Approach. If respondents were purely concerned with resisting development in their area, it may be expected that there would be support for Approach 3

from residents in other locations where development pressures would be reduced, but this is not apparent.

- 3.17 The NPPF advises that new settlements or large-scale extensions to towns and villages can be a suitable way of supplying large numbers of homes (NPPF paragraph 73). However, there is not a need for very large numbers of new homes to be planned for in this Plan period, and other potential strategies can achieve the necessary housing, and the proposals could not deliver this in the short-term anyway. The NPPF also refers to the locations of such developments being planned 'with the support of their communities', which is very obviously lacking for the proposals at Micheldever Station or Royaldown.
- 3.18 The SIP's summary of the Sustainability Appraisal for Approach 3 suggests that it has the potential to achieve a degree of self-containment and to provide infrastructure (including green infrastructure), jobs and services. However it could also result in longer distance travel to some facilities, including by car, and be less supportive of the viability of existing town centres. Some respondents also highlight the risks to delivery of concentrating development in a single large development, something that has been experienced to an extent with the existing strategic allocations. This Approach is also likely to be the least consistent with the desire expressed by many respondents to make best use of brownfield land.
- 3.19 The promoters of Royaldown indicate in their comments that they are no longer actively promoting this as a new settlement, although it could be available if the Council wished. A much smaller area of land is now being promoted through the 2021 Strategic Housing and Employment Land Availability Assessment (SHELAA).
- 3.20 The disadvantages of a new settlement are, if anything, highlighted by the effects of the pandemic, the threat to town centres and the climate emergency. The current situation would suggest the need to focus development on existing settlements to support town and local centres, encourage brownfield development and reduce the need to travel, not to start a new focus of development in an undeveloped rural location. The remaining site actively being promoted, at Micheldever Station, is also on the edge of the district away from the main areas of settlement (and therefore housing need) and would create a new centre for development in a relatively undeveloped and unspoilt tract of countryside between Winchester and Basingstoke.
- 3.21 Therefore, a new settlement should be rejected as a way forward to meet the local housing need in the new Local Plan. It may be necessary to plan for some larger scale development to address the unmet needs of neighbouring authorities in South Hampshire. Whether this is necessary, and the preferred locations, will become apparent when the work being undertaken by PfSH is completed. Even if this indicates a need for a strategic allocation(s) in Winchester District, this will be in the south of the district, not at Micheldever or Royaldown. It is likely that any PfSH proposals would form extensions to the urban areas within/around the southern edge of the district and would thus

be able to be incorporated into an updated 'South Hampshire Urban Areas' spatial area in the new Local Plan.

- 3.22 Approach 1 was the best supported and the aim should be to seek to follow this approach, modifying it where possible to address concerns raised in the public comments or through the Sustainability Appraisal (SA). The summary of the Sustainability Appraisal included in the SIP document identifies various advantages of this Approach, including focussing development on existing settlements where it would reduce the need to travel and supporting town and village centres. The main concerns raised in the SA summary related to the possible impacts of development in the South Hampshire Urban Areas on biodiversity, and on heritage assets in Winchester.
- 3.23 Some of the comments on this Approach also question whether the scale of development envisaged in the South Hampshire Urban Areas is achievable, given that these comprise two development areas that are already planned (West of Waterlooville and North Whiteley). The SIP acknowledged that there may not be capacity within West of Waterlooville or North Whiteley for the 1,266 additional dwellings that would be needed under this Approach. There may be some scope for some intensification or minor extension whilst staying within the limits of these developments and any sites submitted through the SHELAA will be assessed to test this, taking account of the SA's concerns about the impact on biodiversity sites. The SIP suggested that any shortfall may need to be made up within the wider southern part of the district, a suggestion which itself received some objection.
- 3.24 There is already a concentration of development in the southern part of the district, with 2 strategic allocations and 6 of the 8 market towns in this area. This may be accentuated if further development is needed to help meet wider South Hampshire needs. The Strategic Housing Market Assessment 2020 (SHMA) identified different housing market areas in Winchester Town, the northern rural part of the district (broadly the SDNP and areas to the north) and the southern rural area (broadly areas to the south of the SDNP). These areas have variations in housing and market characteristics, including house types, prices and affordability. Winchester Town and the northern rural area tend to have higher levels of need for affordable housing of all types, largely due to the higher housing costs in these areas.
- 3.25 While the standard methodology figure for housing need is a district-wide one, and much of the development that is needed is already planned and committed, there is some scope to address the needs of the northern rural area. Much of this area is within the SDNP, so is not covered by the Local Plan and is unlikely to be able to meet its needs in full. These unmet needs will be met elsewhere in the district. The part of the northern rural area outside the SDNP tends to feature a scattered settlement pattern with few larger and more sustainable settlements. In the current Local Plan only Winchester Town, New Alresford and Kings Worthy are identified as settlements that warrant a specific housing target.

- 3.26 The 'Settlement Hierarchy Review 2021' concludes that those settlements which are the next most sustainable, after those already having housing targets in the existing Local Plan, are all towards the northern part of the district: South Wonston, Sparsholt, Otterbourne and Sutton Scotney. Sparsholt does not have any housing sites promoted on the edge of the village through the SHELAA 2021, so should not have a housing target applied, but the other villages have potential sites and are relatively sustainable, with regular bus services, so would be suitable for modest additional housing targets. Otterbourne is well served by buses between Winchester and Eastleigh, and South Wonston and Sutton Scotney are on the same bus route, where additional development may help to stimulate improvements.
- 3.27 Therefore, as there is likely to be limited capacity to expand the existing strategic allocations at West of Waterlooville and North Whiteley, there is scope to direct an additional modest element of development to the northern part of the district (Winchester Town and sustainable settlements to the north of the South Downs National Park). This could help satisfy some of the respondents that supported Approach 2 (focus development on Winchester) or Approach 4 (dispersed development), or the significant number that supported small-scale or modest development within existing settlements.
- 3.28 Many respondents suggested there may need to be a 'blended' approach and this is recommended, based on Approach 1 but with slightly more development in the rural area (taking elements of Approach 4) and at Winchester (Approach 2). Approach 4 received the second highest level of support and alludes to the identification of 'intermediate' settlements, so there is some support for such an approach. The scale of additional development needed in each sub-area of the district will depend on the overall housing requirement, the level of commitments, and available/suitable sites. This is likely to involve a slightly lower level of provision in the South Hampshire Urban Areas and correspondingly increased provision at Winchester and in the Market Towns and Rural Area, compared to the figures for Approach 1 in the SIP document. The implications for each spatial area are broadly outlined below.
- 3.29 Winchester Town. The SIP document described Approach 1 as requiring some additional development over and above commitments and windfall to achieve the 4,500 dwellings proposed under this Approach. The potential at Sir John Moore Barracks was acknowledged and the site owners are working up proposals for the land. Winchester has the most potential for brownfield development, although this is bound to have limits and several of the larger sites are already treated as commitments (see section below for discussion of brownfield development). These will need to be subject to further assessment of deliverability, but it is likely that windfall and brownfield opportunities, including Sir John Moore Barracks, could provide most of the additional sites needed to meet the housing target for Winchester. If additional allocations are needed they are likely to be small in scale.

- 3.30 South Hampshire Urban Areas (SHUA). As noted above, it may be difficult to achieve the 6,700 dwellings allocated to this spatial area under Approach 1 as existing planned development (West of Waterlooville and North Whiteley) will not achieve this number and there is likely to be limited scope for intensification or expansion of these allocations. This needs to be tested further and the target for the existing South Hampshire Urban Areas adjusted as necessary. This will not affect completion of the existing strategic allocations at West of Waterlooville and North Whiteley, which will continue to be built out along with the planned infrastructure and service provision.
- 3.31 If the work currently being undertaken by the Partnership for South Hampshire identifies a need for additional growth to help meet the wider needs of South Hampshire, it is likely that any sites identified would be additions or extensions to existing urban areas within or around the edge of the district. If such sites needed to be allocated to meet the Duty to Cooperate, this could be seen as a development of the approach taken in identifying the existing South Hampshire Urban Areas, albeit involving additional locations.
- 3.32 Market Towns and Rural Area (MTRA). The SIP document estimated that the 2,800 dwellings that would be required in the MTRA area under Approach 1 would be likely to be accommodated through existing commitments and windfall. This conclusion may need to be updated as the housing requirement, commitments and windfall potential are updated, and to take account of any shortfall within the SHUA.
- 3.33 As noted above, some additional housing in this sub-area could help meet the housing needs of the northern part of the district by identifying several 'intermediate' settlements. For the 8 larger MTRA settlements that have housing targets within the existing Local Plan (500 or 250 dwellings over 20 years), it is likely that a similar requirement to the current Local Plan could be maintained, albeit over a revised period, given the level of existing commitments and windfall potential.
- 3.34 Conclusion: Approach 3 received substantial objection and very limited support. Its promotion of large-scale greenfield development is at odds with current priorities around maintaining the viability of existing centres, reducing travel and carbon emissions, and making best use of brownfield land. One potential site promoted by landowners has been withdrawn and the other new settlement being promoted is poorly located to meet the housing needs of the district or to be assimilated into the settlement pattern of the district. Therefore Approach 3 should be rejected.
- 3.35 Approach 1 received the most support and performs well in terms of its potential to support existing settlements, use brownfield sites and reduce the need to travel. It is likely to need adjustment to add elements of Approaches 2 and 4, which were also fairly well-supported. In particular, it is not likely to be possible to intensify/expand the existing SHUA strategic sites significantly and this would not help meet housing needs in the northern part of the district. Therefore, limited increases should be made to the targets for Winchester

Town and the MTRA. It is proposed that this could be achieved partly through the setting of modest housing targets for 3 additional 'intermediate' settlements (South Wonston, Sutton Scotney and Otterbourne). If additional strategic sites are needed to meet wider South Hampshire needs, it is likely to be possible to include these within a revised SHUA sub-area.

Potential 5th Option

- 3.36 A large number of respondents didn't support any of the SIP's 4 Approaches, which they felt either do not make best use of previously developed land or imply substantial sprawl of Winchester to the south/south-west, and suggest that there should be a '5th option'. Many of these comments consisted of a standard response, while others either used only parts of the standard response, or added to it. A few comments refer to taking the best parts of the existing options (rather than opposing them) to develop an option 5.
- 3.37 The '5th option' does not propose a spatial development strategy or an alternative distribution of housing between various parts of the district, but rather lists a series of features which it is suggested should be achieved. As such it is not a direct alternative to the 4 Approaches in the SIP and cannot be treated as a 'reasonable alternative' in terms of testing it against the SIP Approaches. Nevertheless, it is possible to consider the principles which are promoted and how/whether these should be included in the emerging Local Plan. They are listed as bullet points below, followed by a response.
- *Work alongside the existing supply of housing in the district, which stands at over 11,000 homes. All of the SIP's 4 Approaches take into account commitments as they stood at the time and include a table showing how much housing in each sub-area is already committed and how much additional housing would need to be provided under each Approach. These amounted to 11,308 dwellings at the time of the SIP and this figure will be updated as necessary to reflect the current situation and changes to the Plan period. In addition, an updated Windfall Assessment Report has been produced. The SIP document did not take into account windfall as this updated report had not been published when it was drafted, but a windfall allowance can now be included. Therefore, the existing supply of housing is fully taken into account for all the potential Approaches.*
 - *Use brownfield and previously developed sites across the district, such as Sir John Moore Barracks, minimising the need to develop greenfield land. Many of the existing housing commitments, as well as the windfall potential, involve brownfield land. Greenfield allocations are only made if it is not possible to demonstrate that there is enough suitable and deliverable brownfield sites to meet the housing requirement. The SIP document referred to the need to address the future of Sir John Moore Barracks, although its potential needs be assessed more fully along with other sites promoted for development. There were many comments on*

the topic of brownfield development and these are considered in more detail below.

- *Redevelop the City Centre to tackle the challenges of declining retail, including new homes to bring new life.* Some of the largest town centre sites that could be developed are already allocated in the existing Local Plan and are therefore treated as commitments (e.g. Silver Hill, Station Approach). The Windfall Assessment notes the contribution of commercial premises and estimates that these will continue to contribute to housing supply. But any estimates of the contribution of retail, etc premises need to be robust as there is great uncertainty about the future of town centres currently. There is also a desire to maintain their commercial vitality. This matter is discussed further in the section on brownfield development below.
- *Develop some areas in the south Hampshire urban areas close to the larger centres along the south coast.* It has been noted in discussing the proposed development strategy above that there may not be capacity to significantly increase the existing strategic allocations at West of Waterlooville and North Whiteley. Also urban areas such as Southampton and Portsmouth may not have capacity to meet their development needs, requiring other authorities such as Winchester to assist under the Duty to Cooperate. There may, therefore, be a need to identify additional housing land in the (modified) South Hampshire Urban Areas, but this would be to help meet the needs of the wider South Hampshire area.
- *Allow small developments in-keeping with the character of the market towns and villages, including those in the National Park, which would meet local needs and support local communities.* The City Council is not the planning authority for the National Park and there is a separate Local Plan in place for the whole National Park. All of the SIP's Approaches provide for development in the market towns and villages to varying degrees. The development strategy proposed above would increase the number of settlements that would have a target for housing provision so as to help meet local needs.
- *Be the best option to support a Green Belt to restrict the threat of development spread.* Green Belt is a countryside protection policy that may be applied, if various requirements in the NPPF are satisfied, after provision has been made to meet development needs. A Green Belt could potentially be applied whichever Approach were chosen, but it is not a development strategy in itself. The SIP invited comments on a potential new Green Belt in the section on biodiversity and the natural environment and this issue is considered in detail there.

3.38 Conclusion: The response above shows that the principles promoted as part of a 5th option are often being achieved, or potentially could be, within the

Approaches identified in the SIP. The development strategy proposed above rejects a new settlement, including Royaldown, which was a key concern of most of the supporters of a 5th option. It also takes into account existing housing commitments, makes a windfall allowance, and prioritises brownfield development where there is robust evidence to support this. It would provide for development in the market towns and villages to meet local needs, promote services and reduce travel. As such, the proposed strategy would address many of the aims of the '5th option'.

Use of Brownfield / Windfall Sites

- 3.39 Many respondents wished to see greater use of brownfield sites and/or less use of greenfield land and made various suggestions about where/how this could be achieved. The use of vacant town centre sites or commercial units was frequently suggested, with some respondents suggesting the need for higher density development or a more proactive assessment of previously developed land / urban capacity. The use of brownfield land was also a key element of the '5th option' promoted by a large number of people (see above). Similar points were made in response to the SIP's section on the Local Plan vision.
- 3.40 The NPPF requires that local plans develop a strategy for accommodating development needs in a way that makes 'as much use as possible of previously-developed or 'brownfield' land' (NPPF paragraph 119). The Council is also required to maintain a Brownfield Register and may make an allowance for windfall development where there is 'compelling evidence'. In accordance with this advice, the Council takes into account existing development commitments and windfall potential before making greenfield allocations.
- 3.41 The SIP document included tables illustrating the housing requirements of each potential Approach, all of which showed the housing completed / committed at the time (11,308 dwellings). Many of these commitments involve brownfield land, including those large sites within Winchester that were often suggested in comments, such as the former Police HQ, Silver Hill and Station Approach. These opportunities will, therefore, be taken into account and their capacity and deliverability will be reviewed through the emerging Local Plan, to ensure that their contribution can be maximised, so far as can be justified. There are also large numbers of greenfield commitments that reflect the fact that there was not enough brownfield land for the current Local Plan to avoid making substantial greenfield allocations.
- 3.42 There is, however, a finite amount of brownfield land available at any point in time and there may well be other uses that need to be provided, as well as housing. For example, a balanced community needs to have employment provision, greenspaces, recreation uses and retail/leisure facilities available. An assessment therefore needs to be made of all the potential demands on a

brownfield site and it cannot be assumed that they should automatically be developed for housing. Also, brownfield sites may not be within built-up areas, but in less sustainable locations. Policies are needed so as to retain employment sites, open space, retail, etc, although these will be reviewed to reflect current needs and circumstances.

- 3.43 It is not realistic to require that all brownfield land must be developed before greenfield sites are released, as brownfield sites tend to emerge over time as an existing use ceases or circumstances change. There are a large number of greenfield site commitments but, where further greenfield allocations are needed, consideration could be given to whether there is justification to phase these towards the mid/late Plan period. There is a need to maintain a steady supply of housing land and there would need to be strong justification for holding back sites that are otherwise developable, but this is potentially an option to be considered where new greenfield site allocations are needed.
- 3.44 The new Local Plan will, therefore, seek to make as much use as possible of brownfield land, as required by the NPPF and taking account of the range of needs that are identified and suitability of sites. Some respondents suggest that the Council should be more proactive in seeking out brownfield development opportunities, pointing to the earlier 'Urban Capacity Study'. This study was an early precursor of the Strategic Housing and Employment Land Availability Assessment (SHELAA) and the Brownfield Register and was produced at the time of 'PPG3', when Government advice promoted development at a minimum density of 30 dwellings per hectare.
- 3.45 Although the Council's Urban Capacity Study identified several areas where there was scope for brownfield development and intensification, these were not necessarily taken up. For example, areas of lower density development were identified as having potential for intensification but landowners often did not find this viable and there was frequently local opposition to such development. In fact, pressure to protect the character of these areas led to several 'Local Area Design Statements' being produced. Where development happened (e.g. Chilbolton Avenue) there was some criticism of the results and the effect on the character of the area. Given the strong market conditions in the district, it is perhaps more likely that the development industry will identify and bring forward realistic brownfield development opportunities than it is that the Council could identify them. Such a study is not, therefore, recommended but a key new element of work is proposed to look at 'opportunity areas' as part of the workstream of design issues that will be taking place in the Autumn on the spatial dimension of Winchester and the market towns/rural areas.
- 3.46 The Council has produced an updated Windfall Assessment which concludes that windfall sites will make a greater contribution to housing supply than was estimated by the previous windfall study. This Assessment looks in detail at the types of sites that have produced windfall schemes in the past and whether these are likely to continue. This includes various brownfield sites

such as conversions of existing buildings, residential redevelopment and the redevelopment of commercial sites and buildings. Recent trends towards residential conversion of commercial premises have been noted, particularly in Winchester, and are projected to continue. Conversions and redevelopment of commercial uses, are expected to contribute over 60 dwellings per annum in Winchester and an additional (smaller) allowance is made for residential redevelopment.

- 3.47 The Windfall Assessment provides the robust evidence that the NPPF expects if a windfall allowance is to be made. Several respondents suggest that there is additional scope for residential conversion or redevelopment of shops, offices, etc in the town centre. This may prove to be the case but the situation regarding town centres has changed rapidly and it may be premature to rely on a significant increase over and above the projection already made. Also, there will be key commercial areas where the aim should be to maintain retail, leisure and service uses, rather than allow these to be lost to residential with potential harm to the commercial vitality of the town.
- 3.48 Conclusion: Government advice requires as much use as possible to be made of brownfield sites, but the estimated contribution of windfall or other sources needs to be robust and justified. The Council has always taken account of the expected contribution of brownfield sites before making new greenfield allocations and will continue to do so. But this contribution is finite and emerges over time, so it is not realistic to suggest that there can never be any greenfield releases, or that all brownfield sites must all be used first. Robust assessments of windfall capacity have been produced and the contribution of existing brownfield commitments will be reviewed. The development strategy and vision that is recommended to be included in the new Local Plan will help to maximise the use of brownfield land and reduce the need for further greenfield releases.