REPORT TITLE: LOCAL PLAN 2036 - UPDATE AND NEXT STAGES

3 DECEMBER 2018

REPORT OF PORTFOLIO HOLDER: BUILT ENVIRONMENT

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WARD(S): ALL (OUTSIDE SOUTH DOWNS NATIONAL PARK)

PURPOSE

This report provides an update with progress of the preparation of Local Plan 2036. A local plan launch consultation on the scope and content of the plan was held during July to September and the comments received from this are summarised, together with key changes to National Planning Policy following publication of the revised National Planning Policy Framework (NPPF) in July.

There are still a number of uncertainties pending further changes to national guidance. This report therefore, concludes with progressing with the evidence base for the Local Plan 2036 and it will be necessary to update members on matters such as the development requirements and emerging development strategy in due course.

RECOMMENDATIONS:

- 1. To note progress with the preparation of Local Plan 2036.
- 2. To authorise the Head of Strategic Planning to undertake preparation of the evidence base through commissioning technical reports as indicated at para 11.33 of this report.

IMPLICATIONS:

1 COUNCIL STRATEGY OUTCOME

1.1 The preparation of a new Local Plan provides an opportunity to reflect and reinforce the positive outcomes for our communities which are at the core of the Council Strategy, including its revised vision and objectives. The Local Plan is a key delivery tool to those elements of the Council Strategy that are reliant on the use of land and the provision of infrastructure. Specifically, the Local Plan will include policies to promote economic development and diversity; allocate land for housing purposes and include policies to address specific housing needs across the District. The Local Plan is required by the Government's national planning policy to promote sustainable development and will incorporate a range of policies to enhance the character and strengthen the communities of our towns and villages and to protect our countryside and natural resources. Provision of open space and green infrastructure are key planning requirements when considering new development and contribute to the health and well being of our communities.

2 FINANCIAL IMPLICATIONS

- 2.1 Resources needed to undertake preparation of the Local Plan including procurement of the evidence base and community/stakeholder engagement have been approved as part of the budget process. It will be necessary over the coming months to commission various elements of technical evidence required as referred to in report to Cabinet 3046 on 18 July 2018 and as set out at para 11.33 of this report.
- 2.2 The current forecast external expenditure of approximately £600,000 for the period 2018/19 to 2021/22 is within existing budget projections and supported by the Local Plan reserve (opening 2018/19 balance of £454,000) as well as baseline revenue budget projections. This is in addition to existing in-house employee resources.

3 LEGAL AND PROCUREMENT IMPLICATIONS

- 3.1 The production of a Local Plan is a statutory requirement covered by various elements of planning and other legislation including the Planning and Compulsory Purchase Act 2004, Localism Act 2011, and Town and Country (Local Plan) (England) Regulations 2012 (as amended).
- 3.2 Each stage of the Local Plan preparation process is prescribed in the 2012 Regulations and the Council must comply with those requirements. Where requirements currently exist to comply with European Union law (for example strategic environmental assessments and habitat regulations assessment) these will be translated into UK legislation shortly and will therefore still be binding.
- 3.3 The National Planning Policy Framework (NPPF) also establishes guidance for plan preparation and sets out the 'tests of soundness' that Local

Plans are assessed against. In simple terms they must be justified, effective, positively prepared and consistent with national policy. The NPPF has recently been revised, there are a number of details that the Local Plan will be required to reflect. To meet the test of being 'justified' the Council is now required to produce an 'appropriate strategy' i.e. one which it considers satisfactorily meets the development requirements identified rather than the 'most appropriate strategy' as previously required, which created the difficulty of testing of all possible options. Very importantly, to be considered 'effective' the Council must cooperate with its neighbours as evidenced in Statements of Common Ground which demonstrate how it has addressed cross-boundary strategic matters (including shortfalls in housing provision). These are intended to reinforce the duty to co-operate requirement already in place.

4 WORKFORCE IMPLICATIONS

4.1 Preparation of the Local Plan is a key corporate project which will be led by the Strategic Planning Team, but will need support from the project team to ensure that processes and resources are aligned. Given the strategic nature of the plan, contributions from a number of teams across the Council, will be required, in particular housing, landscape/ecology, transport and legal. These resource requirements can be onerous and can arise at short notice (if the Council is challenged on a technical issue for instance).

5 PROPERTY AND ASSET IMPLICATIONS

None

6 CONSULTATION AND COMMUNICATION

- 6.1 National Planning Guidance and Local Planning Regulations require the preparation of Local Plans to demonstrate ongoing community and stakeholder engagement throughout the plan making process. The Council would always want such an important policy document to be the subject of wide and effective community engagement.
- 6.2 To initiate preparation of the Local Plan 2036, a consultation was held on the 'scope and content' of the Local Plan in accordance with Regulation 18 of the Town and Country Planning (England) (Local Planning) Regulations 2012. This commenced on 24 July 2018 and closed on Friday 21 September 2018 to allow a longer period for comment due to the summer holidays.
- 6.3 All those on the local plan database including statutory consultees and those who have signed up to the e-newsletter were invited to comment. At this stage there were no documents to comment on, the focus being the general 'scope and content' of the Local Plan i.e. what matters should it cover, not the merits of particular policy choices .To aid responses a number of questions were created to act as prompts to generate constructive commentary.
- 6.4 146 responses were received from a range of organisations and individuals from across the District. The following sections of this report summarise the

key points made and suggest a course of action for the Local Plan to move forward.

- 6.5 All representations can be viewed in full at : https://winchester.citizenspace.com/policy-and-planning/winchester-lp-launch/consultation/published select respondent
- In addition, presentations highlighting the stages and timescales for preparation of the Local Plan have already been given to both City Council members and town and parish councils, in conjunction with events organised by the Development Management team on 24 September 2018 and 2 and 8 October 2018.
- 6.7 Officers have also commenced one to one meetings with neighbouring authorities to gather information under the duty to co-operate and will continue with these to ensure that cross- boundary matters are comprehensively assessed. One of the key changes the Government introduced in the revised NPPF is for Statements of Common Ground to be prepared with neighbouring local authorities and key statutory agencies. The primary purpose of this requirement is to demonstrate whether neighbouring authorities have given proper consideration of how they can assist each other in meeting their housing and other requirements. The Government does not regard local planning authority boundaries as 'brick walls' in this regard and expects those which could provide more housing to assist neighbours which cannot satisfy local requirements. Any decisions about housing allocations in the light of those discussions will be for the Council to take in due course.

7 ENVIRONMENTAL CONSIDERATIONS

7.1 The purpose of a local plan is to plan for sustainable development in accordance with national planning policy and guidance recently revised and published in July 2018. This ensures a balance of growth and change with protection and conservation being embedded in the local plan process. Furthermore, once a local plan is drafted it will be assessed against sustainability criteria which will also encompass strategic environmental assessment; habitat regulations assessment, equalities and health impact assessments.

8 EQUALITY IMPACT ASSESSMENT

8.1 As stated above it is a requirement for a local plan to be assessed against equality matters, this will be undertaken when the plan is drafted for consideration. At that stage the Local Plan, including the development strategy and emerging policies, will be screened in terms of its impacts on those with protected characteristics as specified in the Equalities Act 2010, and the results will be published on the Council's website.

9 DATA PROTECTION IMPACT ASSESSMENT

- 9.1 The Council is required to engage with a range of organisations set out in legislation throughout the plan making process. Whilst a formal DPIA will not be required, it is worthwhile noting that the Local Plan process involves consultation with many individuals and organisations and the collection of large amounts of personal information. Meeting the requirements of the General Data Protection Regulation for the data gathered and held will be a significant additional responsibility.
- 9.2 All responses to consultations are 'redacted' of personal information as necessary prior to their publication on the Council's website.

10 RISK MANAGEMENT

The Local Development Scheme has been updated (see report CAB3087(LP) on this agenda) and this includes a high level risk assessment, which forms the basis of the identified risks below:

Risk	Mitigation	Opportunities
Property	n/a	
Community Support	Given the level of interest in planning matters across	Methods of community engagement are set out in
Preparation of a local plan requires extensive community and stakeholder engagement and consultation. This is	the District, it is necessary to ensure sufficient time is allowed for comprehensive engagement.	the Council's Statement of Community Involvement (SCI) which has been revised.
documented at all stages and published.		The Council sees the benefit of working collaboratively with local communities and opportunities to continue with this approach will be explored.
Timescales	Timescales expressed in the revised LDS allow for	The LDS acknowledges that a draft plan will not be
Preparation of the local plan is established in the Local Development Scheme which identifies key milestones.	a number of processes to be undertaken in parallel particularly community engagement and commissioning of evidence studies.	available for consultation until late 2019, this should allow sufficient time for uncertainties around the housing requirement to be resolved.
An issue of uncertainty at this stage is confirmation of the housing growth required over the plan	A key issue will be resolution of the housing requirement and the timing	

period (2016 – 36), there is a current Government consultation on this matter and until the methodology is confirmed there is an element of uncertainty.	of the release of revised housing figures to allow for appropriate commissioning of the evidence base and community discussions.	
Project capacity Preparation of the Local Plan will involve both inhouse resources consisting of officers of the Strategic Planning team and others within the Council, plus appointment of specialists consultants to prepare technical reports for the evidence base.	It will be necessary to ensure that adequate resources are in place to prepare both the Local Plan and update the CIL charging schedule.	Opportunities for joint evidence and engagement will be maximised
Financial / VfM There needs to be sufficient resources both staff and budget to ensure that preparation of the local plan can progress.	The local plan budget includes funds form the earmarked reserve which will be required to fund commissioning of the evidence base. These documents can be costly due to their technical nature.	• •
Legal Risk is that the Local Plan is found unsound at examination	It is necessary to ensure all processes are followed and documented to reduce the risk of a third party challenge during the examination process.	Ensure that any changes in legislation both policy and procedures are followed.
Innovation	n/a	
Reputation Failure to produce a Local Plan could risk speculative planning applications being submitted without a sound base on which to determine them, resulting in unplanned development.	Sufficient slippage has been included in the LDS without compromising the delivery of the Local Plan.	Timescales in the LDS are expressed in broad terms to add some flexibility.
Other		

11 SUPPORTING INFORMATION:

- 11.1 This report updates the committee on a number of elements relating to the Local Plan 2036:
 - Summary of key issues raised through the launch consultation
 - Revised National Planning Policy/Guidance with specific reference to housing need requirements, including governments standardised methodology for calculating housing need, housing delivery test and action plan
 - Next stages in preparation, including commissioning of evidence and community and stakeholder engagement

Summary of key issues raised through Local Plan Launch consultation

- 11.2 CAB3046 (July 2018) set out proposals for consultation on the Local Plan in relation to its scope and content. This is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended. The consultation was launched in July and closed in mid September as detailed at section 6.
- 11.3 Of the 146 responses received, many responded to the 11 questions set out with detailed comments and opinion. These can be viewed in full at https://winchester.citizenspace.com/policy-and-planning/winchester-lp-launch/consultation/published_select_respondent. Appendix A provides a summary of the key points raised together an indication of the level of response.
- 11.4 The purpose of the questionnaire was to determine whether there were any strong opinions on the way that the Council had approached the existing Local Plan to determine whether a new approach is required or whether to proceed on a similar basis.
- 11.5 The first questions sought views as to the spatial split of the District for planning policy purposes, (Winchester Town, Market Towns and Rural Areas and South Hampshire Urban Area) and whether the distribution of growth should be approached in a similar way.
- 11.6 Many respondents agreed that the spatial areas should be retained as these allowed for the distinction of development between the different areas of the District, although a smaller number thought this was too restrictive because it directs development to a limited number of locations. A number of comments sought to promote specific sites for development. Other comments suggested that those settlements listed in existing policy MTRA3 but which do not have a defined settlement boundary should be given the opportunity for some development to allow local people to stay in the area. Comments from the development industry in particular suggested that considering the

- development strategy now, was premature without the knowledge of the quantum of development to be planned for.
- 11.7 With regard to the proportion of development there was no real consensus, with varying comments ranging from existing density and character should be taken into account, that market towns are at capacity or that Winchester Town should no longer be the focus for development (while others suggested that it should be). Some comments were made that each locality should take its fair proportion of new development and that the current approach is too rigid and needs to be more flexible.
- 11.8 There is now a legal requirement for local plans to be updated every 5 years with a review of the development needs and any consequential updates to the development strategy and policy approach. Generally respondents agreed with the suggestion to roll forward the plan period to 2036 (i.e. by one five year period). This means that if the Local Plan is adopted during 2021, the Council would meet the Government's expectation that its Local Plan provides 15 years of certainty. It is important to recognise however that some consideration should always be given to how future Local Plan options might unfold from decisions being made in the current period. There was general support to taking a longer term view, particularly if the allocation of larger sites provided the opportunity to deliver infrastructure. A number of comments suggested that having a range of smaller/medium allocations would provide greater flexibility to be able to adapt to changing circumstances.
- 11.9 Preparation of Local Plan 2036 provides the opportunity to pull together the various elements of the existing Local Plan which is in two parts. Revised planning policy guidance in NPPF suggests that plans should make clear which policies are strategic and indicate broad locations for development on a key diagram. It is these which the Government wishes to ensure are most up to date and provide for deliverable development. Non-strategic matters (such as development management policies) can be dealt with separately as these may require less frequent revision. The consultation responses reveal some support for a single plan as some consider two documents as too complicated. There is some support for neighbourhood planning which is, of course, an option for any community willing to undertake the process. The approach that should be taken will depend to a large extent on the scale of development which the evidence shows needs to be planned for and how this differs from existing planning strategies and policies.
- 11.10 A further element of revised planning policy guidance is an increased emphasis on the duty to co-operate, whereby both neighbouring local authorities together with key infrastructure providers and statutory agencies sign up to statements of common ground. The purpose is to demonstrate co-operative working and agreement to resolve cross-boundary issues. The launch consultation sought comment on the type of cross boarder issue that should be reflected in the local plan. A matter raised by a number of responses was the relationship with the South Downs National Park with some suggesting that the respective local plans need to be progressed in

parallel. Parishes which cover both areas expressed a wish for greater alignment of policies and there were comments regarding a bespoke policy with reference to views looking out from and into the Park as development outside of a protected landscape can harm its special qualities. There were comments regarding the future role of PUSH, the Partnership for Urban South Hampshire, which has played an important role in coordinating housing and employment allocations across south Hampshire. The future role of PUSH is unclear but for the time being it is suggested that it is still relevant to meeting the duty to cooperate.

11.11 Other comments received on wider issues which might be reflected in the Local Plan included

the need for more affordable housing; maintaining the character and community

cohesion of rural communities

introduction of a South Hampshire Green Belt

implications of an ageing population

welfare of young people

The current Local Plan does include policies on these matters but it will be essential to ensure that these are reviewed and carried forward to reflect community priorities.

- 11.12 Local Plan Part 2 includes over 30 development management policies and the consultation sought views as to any matters that were not covered by a planning policy and could benefit from inclusion, or whether any policies were superfluous. The responses suggested various new policies such as space standards, rail infrastructure, local distinctiveness and character, annex buildings for the elderly, equestrian activities, self-build, enhancement of biodiversity and wildlife, parking and dementia friendly policies. It will be important to reflect on these in light of the new NPPF/NPG and evidence base and determine if any updates are required or indeed new policies should be made. Responses to this part of the consultation also suggested that settlement boundaries should be reviewed as more flexibility is required.
- 11.13 Revised NPPF/NPG emphasises the need for viability testing at the plan making stage rather than through the planning application process. Responses to the consultation reflect that it often appears that too much is paid for the land which has a consequential impact on what a scheme can deliver. There was also concern that some viability reports are not published to allow for scrutiny. Both of these matters are the focus of revised national planning guidance and it will be necessary for the Council to ensure that processes are established to ensure emerging policies are thoroughly assessed in terms of viability and the ability of sites to be brought forward and delivered.

- 11.14 To ensure any comment could be made at this stage, the final question sought any other comments on 'the scope and content of the proposed local plan'. Responses included a review of development boundaries; rapid transport solutions; the need to promote all forms of non motorised transport and the opportunity for new development provided by the Botley by-pass.
- 11.15 This section of the questionnaire also received comments from statutory agencies and some of the key infrastructure providers, these are summarised below:-

Southern Water – requests the inclusion of policies on new utility infrastructure; prevention of development that leads to unacceptable deterioration in water quality; consider phasing of new development where capacity is insufficient to meet increased demand and to encourage water efficiency in all developments.

Thames Water – new development should be co-ordinated with the infrastructure it demands and take into account the capacity of existing infrastructure. Local Plans should be the focus for ensuring that investment plans of water and sewerage/waste water companies align with development needs. The provision of water treatment is met by asset plans and from 1st April 2018, network improvements will be from infrastructure charges per dwelling. There will be a connection charge per dwelling which should reflect fairness and affordability; environmental protection, stability and predictability and transparency. It is recommended that developers engage at earliest opportunity to discuss proposals.

Historic England – comments relate to the historic environment and heritage assets and these should be comprehensively considered throughout the plan making process and opportunities maximised for the local plan to recognise their importance. Historic England suggest preparation of a Heritage Topic Paper may present an opportunity to identify not only the assets within the District, but those in adjacent areas and where some assets may not be well recorded, utilising the results of the WinchesterFuture50 Project and other data sources will make a valuable contribution to the evidence base.

Highways England – comment in relation to the capacity of the strategic road network (SRN) and would be concerned if planned levels of development in Winchester resulted in material increases of traffic on the SRN, without consideration of mitigation measures.

Environment Agency – advise that the Local Plan should take into consideration:

- Improving and protecting water quality
- Mitigating and adapting to the effects of climate change
- Achieving a biodiversity net gain
- Managing flood risk

- Improving and protecting ground water
 The local plan should be supported by robust evidence and an
 Environmental Infrastructure Plan to support planned levels of growth.
 The evidence base should include a strategic flood risk assessment and a water cycle study.
- 11.16 As part of the Parish Council briefings the opportunity was taken to seek early views on key issues for parishes and where they saw the Local Plan being a tool to address these. A number of parishes attending the briefings lie wholly within SDNP and Winchester's policies will not apply to them, while others lie within both Winchester and the National Park. Appendix B summarises the comments received, these generally fall into the following broad categories:-
 - Infrastructure need to take into account all forms of infrastructure and impact new development has on this – school/doctor capacity; public transport, parking and increased transport on local roads etc. Also need to consider cross-boundary issues and natural capacity and wider environment impact.
 - Affordable housing lack of starter homes for young people; need to look at opportunities to allow young people/families to stay local; lack of availability of land for small development schemes; promotion of rural exception sites
 - Development pattern- retain settlement boundaries

Revised National Planning Policy Framework

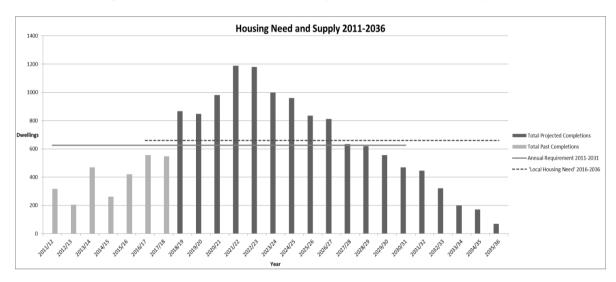
11.17 With publication of the revised NPPF in July, there have also been updates to Planning Policy Guidance which provides detailed interpretation of the policies.

Housing Need – Standard Methodology

- 11.18 To support the delivery of new housing, the Government has introduced a standardised methodology for calculating housing need in each local authority. The method identifies a minimum number of homes to be planned for in a way that addresses projected household growth and historic undersupply. Whilst the use of the standard method is not mandatory, any alternative approach, especially one which produced a lower housing need, would be intensely scrutinised and it is suggested that an alternative approach could not be justified for Winchester.
- 11.19 The standard methodology gives Winchester District an annual housing need of about 660 dwellings per annum. For comparison, the current adopted local plans covering the period 2011 2031 have planned for a housing requirement of 12,500 new homes, which equates to 625 per annum.
- 11.20 The Government is currently consulting on changes to the methodology since its initial publication earlier this year. The outcome of that consultation will not

be announced until the new year, but as the changes proposed are explicitly designed to ensure that assessment of housing need remains constant it is reasonable for the Council to proceed on the assumption that the 660 per annum figure will be the relevant number. If there is a change in the Government requirement this can be considered when it is announced.

11.21 The graph below illustrates the current and future housing need/requirement and how this relates to the expected supply of sites. The existing annual average requirement of 625 dwellings from 2011 – 2031 is shown (by the solid horizontal line), along with the Government's 'local housing need' figure of 660 per annum from 2016 – 2036 (dashed horizontal line).



- 11.22 In terms of housing supply, it can be seen that dwelling completions over the 5 years from 2011-2016 have been below the annual average (grey bars), due to a combination of economic factors and the need to bring forward site allocations for the necessary housing. Provision over the remainder of the current Local Plan period to 2031 (black bars) is estimated to exceed requirements as strategic sites, smaller allocations and other supply are developed. While the low completion levels experienced since 2011 are improving, in practice it may well be that the peaks illustrated in the middle part of the period are smoothed out to maintain higher levels of provision for longer. However, the longer-term supply illustrated is an initial estimate which uses current assumptions (for example on windfall trends), so will need to be refined through work on the Local Plan 2036.
- 11.23 For this reason it is important to note that the 'local housing need' figure of 660 per annum is not the specific number of dwellings the new Local Plan has to provide for. A part of this number is provided for by site allocations and windfalls which are already 'in the system'. This will reduce the need for new allocations. On the other hand, the Council is obliged to consider whether Winchester District can accommodate some of the housing for which neighbouring local planning authorities might not have sufficient sites for. The number of sites submitted to the Council through the 'call for sites' and

published in the SHELAA means that the Council has a wide source of sites to choose from if required.

Housing Delivery Test

11.24 A further matter introduced by revised guidance is the Housing Delivery Test. This is an annual measurement of housing delivery in an area to be published by MHCLG each November. This is a calculation of the number of dwellings completed (which includes an allowance for student and communal accommodation over the same period) compared to the number required over the past three years. Planning practice guidance states that the presumption in favour of sustainable development will apply:-

From the day following the publication of the 2018 Housing Delivery Test, where housing delivery falls bellow 25%

From the day following the publication of the 2019 Housing Delivery Test, where housing delivery falls bellow 45%

From the day following the publication of the 2020 Housing Delivery Test, where housing delivery falls bellow 75%

- 11.25 The implications of the Housing Delivery Test results are complex; current advice states that a test result below 95% for the monitoring period 2017/2018 will require a Housing Action Plan to be produced. Whilst we have yet to receive the results, officers have estimated that the results for the District will fall slightly below 95%, triggering the need for a Housing Action Plan, but well above the 'failure' rate for the Housing Delivery Test set out above. The government has published guidance on matters to be reviewed as part of the action plan which require LPAs to include an analysis of under delivery and the identification of actions to boost delivery, which could include some of the following:-
 - Identification of any barriers to implementation of a planning consent or local plan allocation
 - Barriers to delivery on sites identified as part of the 5 year supply
 - Undertaking a SHLAA/SHELAA and/or a call for sites as part of local plan revision
 - Offering more pre-application discussions
- 11.26 If triggered, it will be necessary for the preparation of a Housing Action Plan to explore matters suggested in the PPG, but given that the Council has commenced preparation of a new local plan which initiated a call for sites some of the actions are already in progress. The action plan needs to be published within 6 months of publication of the Housing Delivery Test.

11.27 The existing housing requirement was established in the Local Plan adopted in March 2013 and this is now over 5 years old. However, good progress has been made in planning for and delivering the existing housing requirement, which is confirmed through having a 7+ year supply of available housing land (using the initial standard methodology requirement of 653p.a.) and the fact that a new Local Plan is now under way which puts the Council in a strong position to resist speculative planning applications. What is clear from revised Government guidance is that certain positions could result in a presumption in favour of development being triggered, it is therefore essential that the Councils' housing land supply position is maintained and the new Local Plan can progress in a timely manner. There is concern therefore, that delays to the confirmation of the housing need methodology and any consequential updated guidance will have a direct impact on such progress.

Duty to Co-operate

- 11.28 As stated previously in this report revised Government guidance has placed an increased emphasis on the duty to co-operate and meeting the unmet needs of neighbouring authorities. This matter is expected to be examined in considerable detail when Local Plans are submitted for examination and it will be necessary to demonstrate that strategic cross-boundary issues have been thoroughly assessed. It is important to stress that the duty to cooperate is not a duty to agree to make provision for anything which neighbouring authorities cannot. However, it will be important to demonstrate policy and planning based reasons for the outcome of discussions with neighbouring authorities, whatever decisions are reached.
- 11.29 Planning practice guidance provides details as to what a Statement of Common Ground is expected to contain. The level of co-operation is expected to be proportionate to the matter(s) being addressed. Para 20 of revised NPPF specifically identifies strategic matters on which co-operation is required, although it is acknowledged that the list is not exhaustive:-
 - Housing (including affordable housing), employment, retail, leisure and other commercial development;
 - Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management and the provision of mineral and energy;
 - Community facilities such as health, education and cultural infrastructure
 - Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure and planning measures to address climate change mitigation and adaptation.
- 11.30 Plan making is given greater emphasis in the revised NPPF, which reinforces the principle that the planning system should be genuinely plan-led. Changes

to the Neighbourhood Planning Act 2017 has made further changes to the 2004 Planning and Compulsory Purchase Act (Section 8), that requires *Each local planning authority must identify the strategic priorities for the development and use of land in the authority's area.* This emphasis on having strategic policies to address local authorities' priorities, is also reflected in the revised NPPF. Given this, Local Plan 2036 will need to make clear which policies are 'strategic'.

11.31 Whilst the tests of soundness remain, there is a greater emphasis on the 'effective' element which reflects the above matters of effective joint working on cross-boundary strategic matters that have been dealt with, rather than deferred, and as evidenced in statements of common ground.

Next stages

- 11.32 The Local Development Scheme (CAB 3087 on this agenda), establishes a programme for the preparation of Local Plan 2036, with publication of a draft plan for consultation in late 2019. Prior to this, the evidence base will be commissioned and collated and early public and stakeholder engagement undertaken.
- 11.33 Preparation of a Local Plan requires extensive evidence, the following table provides an <u>indication</u> of the topics to be covered:-

Title	Topics covered	Resources/Delivery
Strategic Housing Market Assessment	Types and tenures of accommodation needed (student, elderly, disabled) in terms of quantities and form Different categories of affordable housing Different forms of housing-caravans; travellers/non-travellers; Self build Housing mix	Strategic planning WCC New Homes team Hants CC External consultants
Employment, retail, commercial interests	Employment needs assessment and assessment of sites Town centre uses – retail, leisure, cultural/community etc Retail update – needs assessment; hierarchy of centres;	Strategic Planning WCC Economic Development, tourism teams External

	primary/secondary frontages; thresholds for impact assessments Rural economy/tourism	consultants
Landscape - environment	Landscape character assessments Open space strategy Green infrastructure strategy Built environment / conservation areas Climate change	Strategic Planning WCC Landscape and Open Space, Historic Environment teams External consultants
Infrastructure	Capacity of existing / modelling for growth scenarios: Transport, water supply, waste water, flooding, community facilities, power sources/ renewable energy, health, education etc Infrastructure delivery plan	Strategic planning WCC as required HCC as required External consultants
Impact assessments	Sustainability appraisal Strategic environmental impact assessment Habitats regulation assessment Equalities impact assessment Health impact assessment	Strategic Planning External consultants
Viability	Viability assessment of potential development allocations and policies Update to Winchester CIL Charging Schedule	Strategic planning External consultants

- 11.34 The above indicates where there are opportunities for joint commissions; further opportunities may also be possible with neighbouring local planning authorities. The Council's Strategic Planning Team will lead preparation of commissioning briefs in partnership as appropriate.
- 11.35 With regard to community and stakeholder engagement, it now appears the housing need quantum will be in the order of 660 dwellings per annum and therefore it would not be unrealistic to commence discussions with communities/stakeholders on this basis. Responses to the Local Plan launch consultation covered above reveal a range of comments and considerations, what is clear is that with the increasing emphasis on small and medium sites as now promoted through changes to the NPPF, it will be necessary to launch a 'call for small sites'. The existing development strategy of the three spatial areas is well supported therefore a starting point for consideration could be to discuss with local parish councils whether those communities listed under Policy MTRA2 and 3 have any appetite for identifying sites for potential development. A further area for debate could be longer term growth options and opportunities which may potentially need to be considered now for post 2036 delivery.
- 11.36 These matters, subject to any emerging evidence, could be the focus for some form of 'options' consultation during early mid 2019, this timescale would allow for Government guidance and in particular the housing need quantum to be clarified.

12 OTHER OPTIONS CONSIDERED AND REJECTED

12.1 It is a statutory requirement to have an up to date local plan, failure to do so creates uncertainty for businesses and investment and for local communities having to deal with speculative planning applications. Options for development will be assessed as part of the Local Plan process.

BACKGROUND DOCUMENTS:-

Previous Committee Reports:-

CAB3046 - Local Plan Launch 18 July 2018

Other Background Documents:-

none

APPENDICES:

Appendix A: Local Plan Launch summary of key comments received

Appendix B: Feedback from Parish Councils (2 and 8 October 2018)

Appendix A: Local plan launch summary of key comments received

All responses can be viewed in full at https://winchester.citizenspace.com/policy-and-planning/winchester-lp-launch/consultation/published-select-respondent

Question 1

Currently we have a development strategy that sets out planning policy requirements for three spatial areas within the district: Winchester Town, South Hampshire Urban Areas and Market Towns and Rural Areas. This has allowed us to develop focussed policies including proposed levels of growth in these areas to reflect local circumstances and opportunities.

Have the three spatial areas proved useful and are they still relevant – should they be retained?

Response to Question 1:

Yes 64.38% No 9.59% Not answered 26.03%

- It is important to reflect and distinguish between the inherently different requirements and characters of the areas.
- Rural Areas should allow for incremental growth not just house building to include - a mix of housing for entry level sites of exception, smaller units for the elderly, self build and market value homes, but also commercial development.
- needs to be a connectivity to larger towns and cities
- Growth should be focussed in sustainable locations and the settlement hierarchy reviewed
- There is not the need for half the houses that are being pressed for by the government. Very few of them are affordable and thus serve no purpose other that to make builders and landowners rich
- Too much infill
- The three categories have proved more useful to developers than to residents

 The Local Plan for Market Towns and Rural Areas was designed to
 determine housing needs and site allocations up to 2031. In fact, the target of
 250 homes for Shedfield Civil Parish will be exceeded by at least 25% as
 early as 2021.
- Plan processes & policies focus on forecasted future needs but largely ignore backlog; - Create sustainable mini local plan for all settlements, near surroundings and their satellites as a hub to deliver zero carbon footprint and all of the housing backlog & growth by 2036. Plans should define a central zone where aim is meet needs particularly for older age groups, this could include transport hub, shops, pubs, churches & other places to meet, surgery & close care at home.

- Small sites should be identified for self build
- The distinct nature of the three spatial areas within the District necessitate policy that reflects the characteristics, challenges and opportunities of each area. Distinguishing between the three areas in this way is particularly useful as a tool in directing the majority of growth to the most sustainable locations in the District (e.g. Winchester City) and to protect against inappropriate development in rural areas. Whilst not explicitly stated in the revised NPPF, this type of spatial strategy supports a number of wider sustainable development objectives of the framework, including: delivering development in well-connected locations with services and facilities, making effective use of land, improving accessibility, ensuring business viability, coordinating infrastructure provision and promoting vibrant communities.
- there is a risk of 'pigeonholing' when defining high level spatial areas where broad generalisations are made. There will always be exceptions to any rule and planning polices need to be flexible enough to reflect that
- promotion of 71 hectares of land at South Winchester Golf Club for a
 residential-led development (circa 1,300 dwellings), where it has links with
 existing residential developments to the north and north-west (Oliver's Battery
 and Stanmore respectively), developments which form part of the built up
 extent of 'Winchester Town'. This relationship, together with the strong
 accessibility credentials with existing public transport provision providing
 direct links to the town centre and train station, make the site a logical and
 sustainable location for future housing growth
- MTRA3 parishes settlements without boundaries this policy stops local people from staying in the area, locals can't afford the inflated house prices and are not allowed to develop for themselves
- Some settlement-specific analysis is required to achieve this is a 'settlement master plan' approach to set a constraints and opportunities based and longer term growth strategy for each settlement, as the about 250 isn't flexible enough.
- Promotion of 11 hectares of land (about 200 dwellings) at Wickham Park Golf Cub - The Site is not subject to any significant constraints and lies outside of the South Downs National Park. The Site is positioned well in relation to local amenities, Wickham local centre and bus stops, with regular services between Wickham, Winchester and Fareham.
- the Local Plan should continue to reflect the inter-relationships with adjacent neighbouring authorities and plan appropriately around these with greater emphasis of growth at Market Towns and Rural Areas
- Miller and Bloor consider the discussion as to the spatial development strategy to be employed in the new Local Plan to be premature there is a need to have an understanding of development needs and land availability

- Taylor Wimpey supports the Council in the production of a new Local Plan –
 the distribution of development should seek to achieve sustainable
 development and broadly should direct development to those locations which
 offer a range of services and facilities as well as ensuring settlements can
 remain sustainable and support community needs promote land at
 Swanmore Road for 225 dwellings, and Springvale Road for 300 dwellings
- New settlements, small/medium allocations and urban extensions should all be considered based on the evidence, not a pre agreed spatial strategy that undermines national policy.
- Promote land at Dodds Lane for development
- should be a bespoke approach for rural areas, recognising the specific needs of rural communities
- The spatial strategy is still relevant, particularly the role of Winchester Town it is important that sufficient homes are allocated to the Winchester Town
 spatial area to support its status and importance within the District
- Whilst it is possible that the council may well conclude that it remains appropriate to continue with the spatial areas identified in the adopted local plans, it is premature to conclude that this is the case, as the council has the opportunity to depart from it
- The NPPG emphasises the need for plan makers to be proactive in identifying as wide a range of sites as possible, as well as broad locations for development. NPPF paragraph 20 requires Local Plans to identify an appropriate and sustainable strategy for the pattern and scale of development, including housing. National planning policy also stipulates that new development should be distributed to reduce travel and encourage more sustainable modes of travel.
- Development is currently directed to a small number of very broad locations.
 This strategy increases pressure for new development in those areas in terms of constraints, opportunities and infrastructure, and creates an over-reliance on a small number of large sites, usually on green field sites. This strategy is inconsistent with the NPPF requirement for at least 10% of the housing requirement to be on sites no larger than 1ha.
- Whilst the NPPF has amended the definition of affordable housing to include starter homes and discounted market housing, the overall strategy should be reviewed to encourage the delivery of new homes to meet an up to date local housing need
- Welbeck Strategic Land supports the current spatial strategy and its retention focusing new development in accordance with the current spatial strategy, would be more likely to ensure the most efficient use of land and local service provision, by locating new housing where it will be close to essential services, facilities and infrastructure – promote land in Denmead for development

- The Local Plan Review should support a framework to allow for additional growth within the District's Towns and Villages, - promoting land at New Alresford and Littleton
- It is important that the Local Plan Development Management policies are consistent with the approach taken in National Planning Policy for such city centre locations.
- The current city boundaries need to be revisited as they do not reflect the current built up area or adequately respond to possible growth; need a vision for Winchester, plus detailed design guidance
- The NPPF places a renewed emphasis on the importance of supporting and enhancing the vitality of rural communities, and states that planning policies should identify opportunities for villages to grow and thrive
- The delivery of new homes by local plans will be assessed by the Housing Delivery Test and so the expected rates of build-out should be realistic given the lead-in times for large scale sites. Large sites make up a significant proportion of the housing supply in both Winchester district itself and the PUSH area. In order to ensure the delivery of new allocations within the proposed plan period, alongside the continued build-out of committed urban extensions, it is likely to be necessary to refocus the strategy towards directing growth to support town and village centres on relatively modest sized sites.
- Support existing development strategy and agree that the focus for development should be around Winchester City, close to existing services and facilities and existing public transport routes
- it is important that the spatial strategy is developed in response to identified housing needs with a distribution that is consistent with the objective of contributing to the achievement of sustainable development.
- Focus on redevelopment and re-use of brownfield sites
- Amend settlement boundaries to include all allocated sites
- Publication of statements of common ground to ensure transparency
- Spatial areas has been helpful in guiding development across the District, but needs to be recognition that there is overlap between these; need also to take into account the review of LEPs and their relationship with the spatial areas.
- Identify a fourth spatial area South Downs National Park to ensure the SDNP context is reflected in the local plan and its unmet needs are addressed where there is capacity in Winchester District
- Approach should be informed by the Local Nature Partnership's Ecological Network Mapping, to ensure development is located in least damaging and most sustainable locations.

Should the amount of new development required (to be determined) be distributed in a similar way to that in the adopted local plans, with Winchester Town being a focus for development given its level of services and facilities; development within the South Hampshire Urban Area to serve both ours and wider housing needs in accordance with the Partnership for Urban South Hampshire Strategy; and with settlements in the Market Towns and Rural area having levels of development proportionate to their size and function?

Do you agree with this approach?

Response to Question 2:

Yes 49.32% No 26.03% Not answered 24.66%

- Review needs to include Denmead Neighbourhood Plan area
- Local infrastructure has been ignored
- Need to build cheaper housing
- Smaller rural communities have been excluded development boundaries must be extended to allow for a mix of housing as current options are only infill or exception sites
- Must retain character of settlements and not overload them
- Market towns are at capacity
- Need to keep MTRA settlements thriving so allow more development where it can be accommodated
- Do not overlook cycling infrastructure
- Rural communities need expansion be pragmatic about sites outside settlement boundaries
- Winchester Town should no longer be the focus for development it is being destroyed it may be that certain areas are reaching their development capacity and alternatives need to be explored
- Distribution of development should be proportionate to size and function everywhere
- Must ensure all local people have a say
- Existing density and character should be taken into account when deciding if development is appropriate
- The amount of building would suggest a new town would facilities and infrastructure would be better to fulfil the need for housing
- MTRA has taken too big a share of the development since 2011
- Winchester Town should remain the focus of development as it is the most sustainable location due to its size and services – consider a sustainable urban extension or a new settlement in close proximity

- Approach is too prescriptive need flexibility as to where development can go
- Must establish the appropriate level of need for the District
- MTRA settlements need development to survive
- MTRA2 settlements should have elevated status
- Areas around market towns could be considered as one housing area, to allow for linkages to reflect the application of 'local' criteria with exception housing
- MTRA development needs to be proportionate and in keeping without compromising character and future sustainability
- Winchester Town is full up a county wide strategy is needed with a green belt around the City
- Greater emphasis should be given to accommodating growth with MTRA with lower levels of growth to MTRA3 settlements. Several smaller opportunities at a range of sustainable locations is a more nimbler way of sustaining housing supply.
- Should not carry forward the existing approach, need to test against updated evidence and identify the most appropriate locations for sustainable development; need to adopt a mixed approach to provide flexibility to changing circumstances.
- Each locality should take their fair proportion of housing requirements; create settlement boundaries for all settlements
- Need to reflect NPPF requirements for 10% of housing on small sites of less than 1 ha
- Current approach is too rigid and needs to be more flexible
- Winchester and South Hampshire Urban Area should be the focus for development – any development in rural areas should be proportionate to size and function
- Changes to the NPPF allow the Council to consider changing the distribution strategy
- Existing strategy is too limited should allow new housing adjoining existing settlements, there are opportunities to make more efficient use of the countryside in sustainable locations.
- Need protection of settlement boundaries consider a green belt around Winchester. Explore local green space designations to provide protection to boundaries
- South Hampshire Urban Area should accommodate the unmet needs of neighbouring authorities
- Standard methodology numbers are minimums, need to identify actual housing needs
- New local plan should accommodate sufficient flexibility to allow settlements to evolve

 Consider delivering more housing to support economic growth aspirations and the delivery of additional affordable housing

Question 3

The Government now requires local plans to be updated every 5 years, we are suggesting the local plan period is rolled forward by 5 years to run from 2016 – 2036 – what this means is that we will need to find land for new development to cover the period from the end of the existing plan period (2031) to the end of the new plan period (2036). The plan period will include planning permissions granted and houses completed from 1 April 2016 onwards.

Do you agree with rolling forward the local plan by 5 years?

Response to Question 3:

Yes 58.22% No 17.81% Not answered 23.97%

- Not sensible to have all the development happen at the start of the plan period, needs to be a way of releasing land for development on a rolling programme – releasing land early devalues local democracy and puts pressure on local services
- Rolling over 5 years is sensible
- Plan needs to identify development sites as early as possible and meet NPPF housing delivery tests annually
- Plan should reflect actual timeline so period 2020 2040 would be more appropriate
- Need to update demographic data used as well
- Need for continuous review seems to be driven by fixation on housing numbers rather than the need for proper planning
- Numbers built since 2011 must be counted
- Rolling forward simply increases the total numbers of homes to be built
- Housing needs to be addressed by small and medium sized sites as well as large strategic allocations
- A full local plan review is required inline with national planning policy
- A solution may be to allocate reserve sites to which countryside policies apply until they are needed
- Need to take a longer term strategic view beyond 2036 to better accommodate a rolling 5 year update process
- Need to retain plan period as 2031 should not be able to shift goalposts continuously
- Base date should be 2018 to correspond to when preparation started, with end date 2038

- A rolling 5 year local plan will allow for any shortfall in housing need/delivery to be addressed and new land identified if required
- Rolling forward runs a risk of continued stalling of strategic sites resulting in targets not being met
- By the time the plan is adopted it will only have a life of about 10 years, plans are meant to be visionary and have a 15 year horizon
- Reassess 5 year supply and update annually
- Need to plan positively on both brownfield and greenfield sites with a focus on existing settlements of all sizes
- NPPF requires plan to have 15 year period from adoption so any review needs to be rapid to ensure that there is 15 years post adoption
- Rolling forward the local plan is not a sound strategy this will not boost the supply of housing and is not consistent with NPPF
- Review should examine whether the strategy and evidence base are still the most appropriate. The review should therefore not focus solely on extending the plan period but to consider all material changes
- LPP2 inspector advised a full review is required with adoption during 2021, if this
 is delayed then the local plan period must be rolled forward
- Review must properly examine the evidence
- If the housing figure increases then additional development land will be required throughout the plan period not just at the end
- Need a spatial plan for each settlement
- New local plan should not be applied retrospectively
- This is too far ahead and just not give the planning process time to adjust to changing circumstances
- Need to set strategic policies for a longer period to 2014, which will allow for any slippage to the timetable and provide certainty about the development strategy
- The Council's ambitions for economic growth could result in a higher need for housing that calculated using the standard methodology
- The council will need to plan to accommodate for a portion of the unmet housing needs of neighbouring authorities and the National Park

Larger more complex development proposals can take longer to achieve, should the local plan therefore allocate 'strategic' sites (if necessary) even if they may not be fully developed by 2036?

Response to Question 4:

Yes 56.16% No 17.81% Not answered 26.03%

- Larger sites bring the potential to improve services and amenities, but ensuring the necessary infrastructure is in place before the development commences is unsustainable
- Definition of 'strategic' needs to be amended in the smaller settlements to reflect the scale and context
- Must ensure health needs are considered as part of the process
- Should also plan to ensure biodiversity and nature conservation interests are protected
- Need to be forward thinking and identify sites ahead of requirement
- Larger sites can be suitable in the right context
- Strategy needs to be robust enough to demonstrate how development will be accommodated in the future if needed to proper planning can take place for infrastructure etc
- The allocation of strategic sites is necessary to provide the District with a clear long-term strategy for bringing land forward for development – this approach is supported by the revised NPPF. Large sites allow for master planning and have the benefit of providing new services and infrastructure so avoid overburdening existing services
- Need balance between different sizes and spatial distribution
- Need mix of sites to deliver over the plan period, smaller sites have shorter lead in times
- Large scale housing in sustainable locations can and should play a role in meting housing needs, critical issue is viability which is now a requirement during the plan making process
- Explore full potential of MTRA2 settlements first before considering strategic sites
- Larger sites deliver infrastructure as well as housing but are not likely to be fully developed in the plan period
- Need to take a longer term view
- Should not allocate larger sites if will not deliver in plan period have a robust number of smaller sites to come forward more quickly without the complications of larger sites etc
- Must stop garden grabbing
- Should focus on delivery of strategic sites already allocated rather than identifying new allocations. Need to identify a range of sites at sustainable rural settlements as this is a nimbler way to ensure housing supply is maintained
- Support inclusion of strategic scale housing, adopting a mixed approach will provide flexibility to changing circumstances

- The allocation of some strategic sites can help to deliver sustainable communities and housing over the longer term
- Over reliance on large sites 500+untis should be avoided as these can negatively impact on the level of supply
- Should have mix with smaller allocations of 50 -150
- Need a formal framework to guide decisions as to where development should be allocated as none has been in place since 2011
- Development should be guided to the edge of existing settlements
- Strategic sites should be allocated if they are available and appropriate
- NPPF (para 72) highlights the role of larger scale development
- NPPF requires LPAs to allocate 10% of housing on small sites
- Urban regeneration is the key to success
- Taking a long strategic view will protect the area towards the end of the plan period
- Identify potential reserve sites
- Sites should not be allocated unless there is a realistic prospect of them being delivered
- Need to achieve higher densities; facilitate land assembly

Revised Government Guidance suggests that Local Authorities can have a strategic level plan setting out the development strategy for the District and large scale development allocations, followed by details in a local or neighbourhood plan. This would require the preparation of a number of separate documents, along the lines of Local Plan Parts1 and 2.

Should we follow this approach or aim for a single Plan?

Response to Question 5:

Yes 37.67% No 23.26% Not answered 39.04%

- Overall strategic plan is sensible
- Splitting the planning allows for a more granular approach
- Every parish or ward should have the opportunity to prepare their own local plan
- More detailed local plans would allow for focussed updating under a strategic level plan
- Single plan is preferred
- Need local plans for neighbourhoods
- Single plan is too cumbersome

- Need consistency across the District with a single plan
- Single plan is preferred given the length of time for preparation
- Plans need to be more sympathetic to an area rather than broach brush
- Depends on scale of development
- All policies must be in the same place
- A strategic level plan could progress to adoption more rapidly than progressing a combined local plan
- Retain separate site allocations plan
- unsure of wider implications given the need to review local plans every 5 years
 may be appropriate to ensure that there is a District wide strategy in place first followed by detailed implementation policies
- have a single local plan with large allocations 150+ units and smaller allocations through neighbourhood plans
- single local plan is simpler and clearer
- need a number of separate documents
- two plans are too complicated
- allocation of housing targets followed by identification of sites is more manageable in terms of community engagement
- need place based plans
- need to incorporate CWR SPD policies to ensure that these have the force of a local plan policy

Cross border strategic matters need close working with not only neighbouring local authorities but also the key infrastructure providers. Government Guidance sets out the strategic priorities (National Planning Policy Framework 2012, paragraph 156) but are there any cross border issues that you consider particularly important, or which are not mentioned in the NPPF, that will need to be reflected in the local plan?

Response to Question 6:

- Eastleigh and Fareham have strategic sites adjacent to the District
- Relationship with South Downs National Park review border with SDNP
- Need better integration with SDNP where parishes/villages are split across both
- Concern there is a trend for permitting large development on borders
- This covers :- highways; health; education; road network; public transport; biodiversity/nature conservation; water and sewerage; wildlife corridors; drainage; flooding; emergency services
- concern about large scale development impacts on rural areas in Winchester district

- Fixation with housing numbers denies the relationship between those who live in the houses, where they work, shop etc – need to look wider than the local level.
- Needs to be more transparency on how councils are working together how are housing targets shared
- Reinstate requirement for a motorway service station on M27 as allocated in 1998 local plan
- Several environmental/landscape issues are cross border this needs a strategic overview – setting of Winchester now includes South Downs and should be revisited to prelude to any further growth of the city
- Housing need for WCC should provide flexibility to establish linkages with neighbouring authorities
- Commercial developments
- Request that the local plan has a bespoke policy recognising the interaction
 with SDNP, with reference to views looking out from and into the Park.
 Development outside of a protected landscape can harm its special qualities –
 cross boundary issues with SDNP cover conserving and enhancing the
 natural beauty and cultural heritage; biodiversity; delivery of new homes
 including provision for gypsies and travellers; sustainable tourism; safeguarding
 multi-user routes between SDNP and Winchester District.
- Must development Winchester and SDNP plans in tandem Winchester has capacity to meet SDNPs unmet housing needs compared to other neighbouring authorities
- PUSH is an important cross broader issue the strategic needs of PUSH should be met in full and Winchester should aim to deliver as much as possible

The Council has a new Council Strategy which sets out 4 outcomes to be achieved across the District:

Winchester District will be a premier business location; Delivering quality housing options; Improve the health and happiness of our community and Improving the quality of the District's environment

the local plan will reflect the land use requirements of these, are there any other broad matters that the local plan should also refer to?

Response to Question 7:

Yes 48.63% No 19.18% Not answered 32.19%

- Not just about quality of housing need a lot more homes
- Need to cover care and welfare of young people
- Improving infrastructure and services
- Design quality
- Improve biodiversity, wildlife, nature conservation and public open space
- Need for key worker housing
- Green infrastructure
- Sustainable transport
- More attention to self builders
- Protect rural nature of the countryside around villages and protect green spaces between communities
- Population and housing density and available services
- What's the land use consequences of a premier business location?
- What is the relationship between the local plan and the Council strategy these should not be separate documents
- Sport and recreation provision
- Housing affordability is a key issue need a step change in housing delivery
- Build local houses for local people
- Introduce a south Hampshire green belt
- Need growth in employment opportunities
- Landscape character and natural capital
- Maintain the character and community cohesion of rural communities
- Implications of an ageing population
- Consider level of retail rents if there is a desire to be a premier business location
- Parking/park and ride and public transport all need addressing
- Health infrastructure is necessary to meet the needs of patients
- Climate change both mitigation and adaptation need to be specifically referred to
- Winchester should be a major commercial centre and the local plan provides an opportunity to create a leading commercial centre to accommodate a wide range of businesses there is not enough office space; local businesses feel the council does not reflect their needs; commercial developers feel unwelcome; not enough development of offices for start ups and small businesses; Winchester is a weak economy dominated by the public sector, its heritage attracts short term visitors these do not provide a strong base on which to build a dynamic economy
- Resolve affordable housing issue need whole plan affordable housing target with a flexible approach to delivery and a wide range of types
- Retain commercial development on edge of the city

- need a pro-business strategy and leadership to realise aim of being a premier business location
- Winchester is identified as a gateway to SDNP in SDNP local plan need to ensure tourism benefits the city and links beyond
- Need to differentiate between premier business location and vibrant town centres
- Add heritage related businesses to the list
- Have regard to the PUSH area
- Business is too broad an expression need to clarify and define

Local Plan Part 2 includes over 30 development management policies, are there any topics/issues not covered that it would be beneficial to have planning policy guidance on, or any matters that are covered which you consider unnecessary?

Response to Question 8:

- Include policy on space standards
- Rail infrastructure
- Consider local distinctiveness and character
- Reuse of existing buildings
- Annex buildings for the elderly/housing for the elderly
- Local policies at ward level
- Rewilding the District great crested newts licensing
- Equestrians particularly transport and travel plans
- More details on industrial developments
- Self build
- None of the DM policies support the objectives of enhancing wildlife and biodiversity
- Limiting extensions to small houses only applies to rural area but principle applies also to urban areas
- Need to cover sport and recreation
- Traffic management transport and parking sustainable transport
- Focus on economic activity
- Provision for environmental improvements
- Recycling facilities
- Walking, cycling routes
- Stronger focus on landscape mature trees public realm
- Health provision medical facilities
- Affordable housing

- Borders of SDNP include reference to the 'landscape scale approach for the Winchester Urban Fringe' currently being prepared
- Green belt
- Brownfield site policy
- Nitrogen neutral developments
- Strategic gaps
- Air pollution
- Preserving communities
- Urban regeneration
- Contemporary play strategy/policies are required
- Good design
- Airspace
- Local green space
- Climate change should feature more strongly
- Food retail/betting shops hot food takeaways healthy high street guidance
- Health and wellbeing
- Dementia friendly communities
- Lifetime homes flexible and affordable accommodation
- Open space needs to reflect perceived quality/safety; physical activity opportunities; social cohesion
- Parking cars, cycle etc
- Review of settlement boundaries have policy to allow for flexible application

Do you have any other comments on the development management policies?

Response to Question 9:

- Build cheaper houses
- Must keep new housing in Winchester to a minimum
- Low level housing for older people
- Market towns need transport and parking strategies; transport policy
- Infrastructure
- Management of land within development
- Electric charging points on streets
- Self build
- Simpler use of CIL
- Have lost detail on our landscape character and heritage
- Economic development
- Avoid using terms acceptable/unacceptable in policies

- Policies are too generic
- Inclusion of nationally described space standards needs to be justified and evidence based
- Need to strengthen policies on local centres; open space strategy; landscape policy
- Need to amend the settlement boundary around Winchester as it is too restrictive and does not allow for sustainable growth
- Incorporate SPDs into the local plan to give them more weight
- Trees and tree planting and the natural environment
- Airspace
- Local green space
- Energy and sustainability requirements

Government guidance requires local plan policies to be viable taking into account evidence of infrastructure and all other policy requirements (affordable housing provision, open space and green infrastructure, access requirements etc) What in your experience are the main challenges for developers in delivering these or for communities in achieving them?

Response to Question 10:

Summary of comments;

- Restrictions on land available for development
- Developers want to maximise profits so do not wish to provide low cost housing
- Need infrastructure to ensure places are created not just housing
- Developers are allowed to use viability as an tool to amend plans
- Current policies do not allow for progress in meeting housing needs due to local opposition
- Too much is paid for the land so the project becomes unviable
- Small builders will be more committed
- Need to manage expectations of profit and cost plans appropriately to cover all requirements of infrastructure, design etc
- Need joined up approach to infrastructure provision
- Need settlement master plans to balance rates of delivery and infrastructure requirements
- Need to fully understand infrastructure requirements and costs etc
- Lack of transparency with regard to viability
- Need to optimise densities on sites
- Ensure that CIL rates and/or S106 are proportionate
- CIL is main constraint
- Must also deliver net gain in biodiversity and enhance ecological networks

Do you have any other comments on the scope and content of the proposed local plan?

Response to Question 11:

- Development boundaries need to expand in all communities
- Health needs must be taken into consideration
- Relationship of WCC and SDNP and their strategic outcomes is fundamental to the balance of the District
- Local plan needs to refer to all non-motorised forms of transport
- Southern water requests policies on new utility infrastructure; prevention of development that leads to an unacceptable deterioration in water quality; phasing of development where existing capacity is insufficient to meet the increased demand; encourage water efficiency in all developments
- Should not ignore existing ribbons of development these should not be placed in the countryside they form part of the settlement
- Allow village 'infill' for small builders
- Botley bypass offers opportunity for new development to address a number of longstanding issues – affordable housing; parking at the station; elderly accommodation etc
- Request Curbridge and Curdridge should continue to be included under rural villages policy
- Update biodiversity action plan
- Housing strategy is short sighted
- Travel infrastructure rapid transport solution
- Thames Water detailed comments in relation to water supply and sewerage/waste water treatment infrastructure
- Historic England detailed comments in relation to the historic environment
- National Custom and Self Build Association local plan needs to reflect government advice in relation to self build – with a target included and policy promoting self build opportunities
- Focus on re-use of brownfield sites
- Need to accommodate needs for travelling showpeople and allocate more sites
- Highways England would be concerned if there is a material increase in traffic on strategic road network without consideration of mitigation measures
- Environment Agency comments refer to improving and protecting water quality; mitigating and adapting effects of climate change; achieving biodiversity net gain; improving and protecting groundwater- suggest preparing an Environmental Infrastructure Plan

Consider new development sites around Winchester including for park and ride;
 and future of River Park Leisure Centre site – need a city wide urban design framework

Appendix B : Feedback from Parish Councils (2 and 8 October 2018)

	Main Issues	How can the LP help?
Badger Farm Parish Council	HMOs Access points to parish – hard to get out on to Badger Farm Road because of traffic numbers Infrastructure – access to school places, doctors etc	Make sure University of Winchester has adequate plan for housing growth in student numbers – build residences on own land
Bighton Parish Council	Huge lack of starter homes for local young people – very unlikely to happen due to land availability. Closure of local pub with application for a one house development in part of the car park area. The parish very much wants to retain and reopen the pub as a local amenity and objects to the development.	Help provide other options to allow young people / young families to stay local and affordable in an area of very high property prices.
Bishop's Waltham Parish Council (Partly in SDNP)	Infrastructure, especially roads off the main B2077. HCC did not appear to consider total build up of traffic. No development of businesses yet for existing plan. Following LPP1/2 both schools have been expanded and currently fill their sites. Traffic Parking in the village (hopefully recent planning permission for extension to Jubilee Hall car park will alleviate some of the problems Access to housing developments from / into main B2177 Permission being granted but developers not building yet	More consideration to be taken of total "effect" of <u>all</u> development. New sites for schools may be required. It can help the BW Parish Council to communicate with our residents so that the development areas are chosen by and acceptable to the whole village. (If allocated numbers, will they be additional to extra ones we may have anyway.
Bramdean and Hinton Ampner (In SDNP)	Maintaining public transport Flooding on A272 – resolved? Affordable housing for local people – housing needs survey in October Road noise and speeding on A272 Speed of enforcement	SDNP
Cheriton Parish Council (Mostly in SDNP)	Traffic – growth, HGV's – volume, speed, run off (environmental built and natural) Lack of availability of small housing units and the available	Recognise that an authority Local Plan crosses boarders and that roads will run from one authority to another bringing with

	1	
	land upon which to build them	it environmental impacts chiefly as a result
	Lack of planning management / enforcement – largely	of traffic and consider how best to fund
	historic but with continual impacts upon the present	mitigation measures in order to avoid
	No real voice on planning	adverse impacts or minimise them upon
	No recognition among planning of the importance of natural	other authority parishes.
	capital, the need to build a cost into the planning process	Do not just look at applications singly, but
	that commits developers to supporting infrastructure outside	strategically in order to identify the 'hot
	the bounds of the development and mitigating against	spots' or bottle necks to model the entire
	adverse impacts upon say parishes bordering	plan when known.
Colden Common Parish	EBC devp	Some control over poor devp
Council	Over devp	Safeguard countryside round village
(Partly in SDNP)	Traffic / transport	
	Lack of infrastructure – schools, doctors, drainage	
Compton and Shawford	Traffic / motorway	Strong guidelines
Parish Council	Backland development / large houses being demolished	
(Partly in SDNP)	and smaller being built in numbers	
(*, ,	Dangerous road junctions	
	Inappropriate development in Conservation Area	
	Bushfield Camp development	
	Aircraft noise due to development at Southampton Airport	
	Commuter car parking at Shawford Station	
Crawley Parish Council	Surrounding development affects traffic through our village	Stipulate transport matter
crame, ranen coanen	Consideration of housing infrastructure	Listen to local concerns
Curdridge Parish	Redundant farm buildings contravening planning consent,	Appropriate road access for new
Council	increasing use, i.e. hours of operation, noise, smoke, traffic,	development.
	noise etc.	
	Excessive housing development in surrounding villages	
	bringing extra traffic onto narrow country lane in our village.	
Denmead Parish Council	Rural fields being used for shipping containers / caravans	By respecting the difference between
(Partly in SDNP)	Garage conversions being approved despite PD being	Denmead development and Winchester
(,	removed and there being parking issues in the area already	central – we don't have public transport so
	Our business park being lost to conversion to housing, so	people have to rely on cars so parking
	local jobs going – current high end service businesses eg.	policies must reflect this and be strictly
	Solicitors are looking to move as they don't want their	adhered to.
	clients housing to look at peoples laundry when they are	
	Unionis housing to look at peoples launury when they are	

	seeking professional services.	
Headbourne Worthy Parish Council (Partly in SDNP)	Flooding and non enforcement of riparian accountability Traffic – increasing volume Barton Farm increasing, but still under Headbourne Worthy PC Narrow roads and lack of space for footways Unaffordable housing	Allowing the parish voice to be heard
Itchen Valley (Partly in SDNP)	The increase in noise from the M3 J9 proposals. The A34 traffic will be going 70mph and producing more noise than the stop/start J9 roundabout. The northbound A34 should not be perched but at the same lower level southbound. A noise bund could be created on the eastern side Land for social housing	Create a policy for the M3 J9 with priorities Promote rural exception sites
Littleton and Harestock (Partly in SDNP)	Flooding – new houses will make any flooding issues worse at South Drive Overdevelopment around the periphery of the village will change the character of the village The gap between Littleton and Harestock must be maintained Increase in traffic through the village from the A34 Increase in traffic on Harestock Road from A34 and Barton Farm	
Micheldever Parish Council	Possible 6,000 houses at station. Parish has seen many small developments in villages doing our bit Green Belt area needs maintaining. Many family type properties with single elderly residents? Provision of full cost open market retirement properties in community.	Ensure development in areas required. If London needs more house build by London.
Owslebury Parish Council (Majority in SDNP)	Unaffordable housing Traffic Planning system communications – including enforcement More time for Council's at planning meetings!!	

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Shedfield Parish Council	Adapting to rapid and substantial increase in homes and	Adopt a more holistic approach to planning.
(Small section in SDNP)	cars with no change to roads, schools, doctors / dentists –	Consider type of housing need (2/3 bed
	CIL cannot address these	houses, bungalows, flats) and not just the
	Waltham Chase given same allocation as much larger	numbers, which allow developers to
	neighbouring settlements	maximise profits.
Sparsholt Parish	Developers wanting to change our settlement boundary	Ensuring our settlement boundary is not
Council	Lack of infrastructure causing the village to be used as a rat	breached
	run. When applications are approved eg. Winchester Village	Emphasising – VDS and conservations
	traffic tries to avoid the traffic jams from Badger Farm by	plans are adhered to and our Parish Plan
	Hursley Traffic and traffic from M3 Junction 11 use Enmill	Look at infrastructure when assessing new
	Lane and then via Crabwood through Sparsholt Village.	and larger developments that are proposed
	No weight restrictions causing unsuitably large vehicles to	
	travel through the village and woods.	
Wonston Parish Council	Provision of affordable housing	Identification of suitable sites for the
	Traffic congestion when incidents occur on the A34 and M3	location of affordable housing.
	/A302 – huge volumes of traffic attempt to find ways	Identified traffic flows contingency plans.
	through the minor roads and villages.	The state of the s
Unnamed Parish	Infrastructure change effected by additional housing ie.	
Comments	Schools, police, doctors surgery etc	
	Winchester planning appears to give no credence to local	
	"design statement"	
	Inconsistency of planning decisions	
	The settlement area is saturated. For LPP2 we extended	
	the boundary we cannot keep doing this.	
<u>[</u>	The beariagy we carried keep doing this.	