

# LITTLETON & HARESTOCK PARISH COUNCIL (LHPC)

## Response to the Winchester City Council Regulation 18 Local Plan 2019-2039 Consultation

### Introduction

1. The Parish Council welcomes the opportunity to comment on the Regulation 18 Local Plan. This response sets out its comments.

**Littleton and Harestock Parish Council have indicated in the following paragraphs where we ‘Support’, suggest ‘Strengthening’ or ‘Object’ to the various policies listed below and hope due consideration will be given to this response.**

### Policies

#### *Strategic Policy SP1 Vision and Objectives*

2. The policy sets out Winchester City Council’s commitment to deliver its vision and objectives which includes engaging proactively with a range of partners. It provides the basis for working with organisations such as parish councils. The Parish Council welcomes the opportunity to contribute to the future planning of its area but any engagement must be such that the views of the local community are seen to be influencing decisions and not just a tick-box exercise.

**Strengthen Policy SP1** by explicitly stating: “... engage proactively with a range of partners, including parish councils, to jointly find solutions... “

#### *Strategic Policy SP2 Spatial Strategy and Development Principles*

3. The policy sets the overall strategy and principles for the development put forward in the Plan. It sets out seven criteria for new development to meet and refers to the Sir John Moore Barracks (SJMB) as a key site in the Winchester Town spatial area. The policy provides the strategic framework for more detailed policies. The Parish Council supports the policy.

#### **Support Policy SP2**

#### *Strategic Policy SP3 Development in the Countryside*

4. The policy seeks to restrict development to that which has a need to be located in the countryside. It is a key policy for managing development proposals outside of defined settlement boundaries. The Parish Council considers that the countryside is one of the district’s most important assets and any development should be fully justified. The Parish Council supports the policy.

#### **Support Policy SP3**

#### *Strategic Policy D2 design principles for Winchester Town*

5. The policy sets out the approach to design that WCC expects promoters of development to use to inform their proposals. Eight criteria are set out which include reference to community engagement, existing patterns of development, improving local connections, better environment for pedestrians and cyclists and the retaining and enhancing of existing green spaces and including more public spaces. The Parish Council considers that new development should make a positive contribution to the area in which it is located and be integrated with it. The Parish Council supports the policy.

#### **Support Policy D2**

#### *Strategic Policy (CN): Carbon Neutrality and Designing for Low Carbon Infrastructure*

6. The Parish Council warmly welcomes the intentions to put climate change, adaptation and mitigation at the heart of the Plan’s strategy. Given the challenges we face, there is no other option than to address these head on. Of course, future practice needs to match the good intentions, but whenever there is a

perceived balance between climate considerations and other factors, the imperatives of addressing climate change should be uppermost. The Parish Council supports these policies.

**Support policies CN1-7 inclusive.**

*Strategic Policy D5 Masterplan*

7. WCC are relying upon the preparation of masterplans to provide the detailed planning framework to deliver the strategic allocations of the Plan. The intention of WCC is that the masterplans will be prepared by landowners and developers with input from it and following community engagement. However, as currently drafted there is no specific reference or requirement for the promoters of the strategic sites to engage with the local community which is a serious omission. This despite the reference under the ‘What are we aiming to achieve?’ to the involvement and input from local people. The text of the second paragraph which precedes the criteria is poorly drafted with some text clearly missing. It should be consistent with the text in paragraph 12.23 of the Plan under Policy W2 which in turn should include a reference to the involvement of the local community.
8. The reliance on landowners and developers to lead on the preparation of masterplans is of serious concern to the Parish Council as it hands control of the planning framework to them. If that is WCC’s preferred approach then the strategic policy and the specific site allocation policy ref Policy W2 should include much more detail particularly where there are land-use implications. As currently drafted both Policy D5 and W2 do not provide a robust framework for the delivery of strategic sites nor do they provide the necessary clarity in respect of the impact on the parish of the redevelopment of the Sir John Moore Barracks (SJMB).
9. The Plan at paragraph 5.70 states that the masterplan could be prepared at the same time as the submission of development proposals. The Parish Council considers that the masterplan should be in place well before any application is submitted to ensure that it has led the planning process and informed detailed proposals.
10. The status of the masterplan is not at all clear. This is of major concern for the Parish Council. For large sites such as Sir John Moore Barracks (SJMB) it is reasonable to expect, at the very least, that the Plan should set out detailed requirements for the development of strategic sites. It is not good practice to rely upon other documents to set out the precise land-use implications of local plan policies. It also means that the local community when commenting on this local plan and future versions do not have a clear understanding of the implications of allocating the Sir John Moore Barracks (SJMB). Given the importance of the site and the scale of development proposed it should either be the subject of a detailed site allocation policy or be the subject of a separate site allocations development plan document. A more detailed masterplan could then be developed as supplementary guidance with all of them being subject of effective community engagement. The current approach leaves too many important decisions to an informal process which would be developer led and would carry little weight in the decision-making process when an application was submitted. These concerns cannot be overstated. The Parish Council objects to the policy.

**Object to Policy D5 as it relies upon the preparation of non-statutory planning documents to deliver the policies of the local plan in respect of strategic land allocations**

**Object to Policy D5 as it relies upon landowners and developers to lead the process of preparing a masterplan, that role should be undertaken by WCC**

**Object to Policy D5. It should be redrafted to include a specific requirement that the preparation of a masterplan must include effective and inclusive engagement with the local community.**

**Object to Policy D5. Paragraph 5.70 should be amended to state that masterplans must be in place before development proposals are submitted.**

*Strategic Policy D6 Brownfield Development and making best use of land*

11. The use of brownfield land to meet the needs of the district has the potential to make a greater contribution to reducing the carbon footprint of the district than greenfield sites. However, they can present a number of challenges to their re-use which requires clear guidance on how the local plan policies would be applied. The policy only refers to sites within settlements and makes no reference to sites in the countryside.
12. The policy seeks to optimise the development potential of brownfield sites and to deliver higher densities. It recognises that there will be other considerations such as the need to create high quality places. The supporting text, ref paragraph 5.71 does reference the character of the site and wider area but does not include other key factors such as landscape and biodiversity. The Parish Council objects to the policy.

**Object to Policy D6. It does not extend to brownfield sites in the countryside. It should be amended to include other key considerations to the development of brownfield land such as landscape quality and biodiversity.**

*Strategic Policy T2 Parking for New Developments*

13. The policy sets out a new approach whereby rather than set standards for parking provision to be complied with and any reductions to be justified by the developer, WCC now propose that it is for developers to make the case for the number of spaces provided. The intention is to seek a reduction in parking provision in favour of more sustainable forms of transport.
14. The Parish Council is very concerned that this new approach will not deliver the outcomes intended by WCC. By setting standards for parking in a local plan all developers know what is required, should they choose to bring forward a site. The new policy could encourage developers to promote sites with lower parking provision and to reflect that approach in any agreements with landowners. In those instances where WCC did not accept a lower standard it would now be for it to justify its decision which would most likely generate more work for officers. It could also be more difficult to increase the number of parking spaces given the commercial decisions taken by the developer who may seek to minimise any cost implications at the expense of other policy requirements.
15. The implications of insufficient parking on a new development can have a significant impact on adjoining areas. The Parish Council is concerned that the approach is likely to create parking issues for existing and new residents. WCC are basing the approach on the availability of alternative means of travel particularly public transport, over which it has no control and consequently a serious weakness for the Plan. The Parish Council objects to the policy.

**Object to Policy T2. The policy is likely to deliver schemes where the lack of parking becomes a serious design and social issue.**

*Policy T4 Access for New Developments*

16. The policy sets out a requirement for new or changes to existing accesses to development to support non-car modes of transport and to provide safe and attractive routes to, from and within a site. How a site is integrated with the local environment in terms of transport is a key issue. The Parish Council supports the policy

**Support Policy T4**

*Policy NE1 Protecting and Enhancing Biodiversity and the Natural Environment in the District*

17. The Plan recognises the importance of the natural environment and this policy sets out the framework for managing the impact on it of development. Development will only be permitted where it demonstrates that it will protect and enhance the natural environment and biodiversity. The Parish Council considers that the natural environment of the district is one which must be protected and opportunities taken to enhance it. It supports the policy.

**Support Policy NE1**

*Policy NE4 Green and Blue Infrastructure*

18. The Plan highlights the importance of green and blue infrastructure and identifies key assets including natural and semi-natural greenspaces such as chalk down lands. The Plan also identifies a deficit in informal greenspaces within the district. The policy provides the framework for seeking to improve the natural environment. These should include the use of verges and 'pocket parks' to create, for example, wildflower meadows so that mini green corridors can be established that also attract insects. The Parish Council supports the policy

**Support Policy NE4**

*Policy NE5 Biodiversity*

19. The policy seeks to protect and enhance the biodiversity of the district and will permit development that achieves that. Any assessment of whether a development meets the requirements of the policy will require a full understanding of the biodiversity of a site and the potential to improve it. The Parish Council supports the policy.

**Support Policy NE5**

*Policy NE7 Settlement Gaps*

20. WCC consider settlement gaps as an important tool in identifying and protecting areas which could potentially be at risk of coalescence and help settlements maintain their separate identities. Development within areas identified as gaps must retain the open and undeveloped nature and ensure that settlements retain their identity. The Policy includes a gap between Winchester and Littleton.
21. The policy as drafted does not provide the same clear policy framework as that set out in Policy CP18 of the adopted Joint Core Strategy 2013. Policy NE7 wording only seeks to restrict development which does not undermine the function of the gap and its intended role. Policy CP18 is much clearer on the form of development which would not be acceptable: 'Within these areas only development that does not physically or visually diminish the gap will be allowed.' The supporting text of para 9.43 goes further
- it would not diminish the physical and/or visual separation of settlements; and
  - it would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.
22. The Parish Council is concerned that the boundary of the Winchester –Littleton settlement gap is not defined in the Plan but appears to be deferred to the masterplan proposed under Policy W2. It is vital that the designation of settlement gaps, given their importance in the overall spatial strategy, should be fully defined in the Plan and shown on the proposals map. It is not a matter to be delegated to a masterplan prepared by the landowner/developer.

**Support Policy NE7 and the inclusion of a gap between Winchester and Littleton**

**Object to Policy NE7. The boundary of the Winchester-Littleton settlement gap should be identified on the proposals map of the Plan**

**Object to Policy NE7. The policy should be re-drafted as follows 'Development within settlement gaps would only be allowed if it**

- **would not diminish the physical and/or visual separation of settlements; and**
- **would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.**

*Policy NE9 Landscape Character*

23. The landscape of the district is very important to its character and function. The policy permits new development where it protects and enhances the district's distinctive landscape character. The Parish Council supports the policy.

**Support Policy NE9**

*Policy NE14 Rural Character*

24. The aim of the policy is to protect the countryside from unnecessary new development. Where new development is justified it should not harm the rural character of the area outside settlement boundaries. The Parish Council supports the policy.

**Support Policy NE14**

*Strategic Policy HE1 Historic Environment*

25. The heritage of an area, including in our Parish at Flowerdown, is an important part of its character. The proposed heritage policies of the local plan provide a robust framework and are supported by the Parish Council.

**Support Strategic Policy HE1**

*Policy HE2 All Heritage Assets*

**Support Policy HE2**

*Policy HE3 Designated Heritage Assets*

**Support Policy HE3**

*Policy HE4 Non- Designated Heritage Assets*

**Support Policy HE4**

*Policy HE5 Mitigation and the Avoidance of loss of Heritage Assets*

**Support Policy HE5**

*Policy HE6 Scheduled Monuments and Nationally Important Non-Designated Assets*

**Support Policy HE6**

*Policy HE7 Non-Designated Archaeological Assets*

**Support Policy HE7**

*Policy H1 Housing Provision*

26. WCC are proposing a figure of 15628 which is in excess of the figure based on the Government's standard methodology and exceeds it by 1450 homes. The justification for the extra homes is to cover the possibility of adjoining districts including in the area covered by Partnership for South Hampshire (PFSH) not meeting their own requirements and the non-delivery of sites or shortcomings in the other sources of supply it identifies in the Plan.

27. How the figure of 1450 was arrived at is not clear and seems premature as the PFSH authorities have yet to collectively agree what their housing requirement will be for its new strategy and are unlikely to do so until well into 2023. In calculating its five-year supply WCC has to include a buffer of at least 5% to ensure choice and completion so a further 15% seems unnecessary. The Parish Council is concerned that there is unnecessary pressure on the Sir John Moore Barracks (SJMB) site to deliver more homes than WCC is currently assuming in its land supply tables i.e. 900 dwellings and that the final figure could be at the higher end of the range 750-1000 referred to in Policy W2.

28. The five-year housing land supply for the district is calculated on the annualised number of dwellings per year proposed in the local plan. WCC's approach of increasing its requirement has a significant impact on the five-year figure. This results in an annual requirement for 819 dwellings when the 5% buffer from the NPPF is added, which is well in excess of the average rate of completions that WCC have experienced in recent years i.e. 550dpa. A failure to deliver the projected requirement would lead to a supply shortfall which would make areas in the parish vulnerable to planning by appeal. The Parish Council objects to the policy and considers that the local plan requirement for 15628 is not justified and should be reviewed.

**Object to Policy H1. The addition of a buffer of 1450 is not necessary and has not been justified.**

*Policy H3 Spatial Housing Distribution*

29. The housing requirement for the Winchester Town is set out in the table within the policy. Paragraph 9.25 identifies Sir John Moore Barracks (SJMB) as one of the key sites allocated to meet that requirement which is described as a previously developed site. The Parish Council is concerned that as written the Plan gives the impression that all of the site is previously developed land which is not the case. It objects to the wording of the supporting text.

30. The area north of Winchester is proposed to accommodate approximately 3,000 new homes at King's Barton and Sir John Moore Barracks (SJMB), which amounts to 20% of the total Local Plan requirement. The Parish Council is concerned that the environmental impact of the scale of development proposed and that the in-combination effects of the development have not been fully assessed.

**Object to Policy H3. The impact of the allocation of the Sir John Moore Barracks (SJMB) for development should be assessed in the context of the wider area including the existing development at King's Barton.**

**Object to paragraph 9.25 and the reference to the Sir John Moore Barracks (SJMB) site being previously developed land.**

*Policy W2 Sir John Moore Barracks*

31. The policy proposes the Sir John Moore Barracks (SJMB) site as a housing allocation. It sets out some broad requirements in terms of how it would want to see the site developed with the details to be included in a masterplan. The Parish Council has a number of issues with the policy and the approach taken by WCC.

32. The first issue is the lack of detail set out in the policy to guide the preparation of a masterplan. The number of homes is presented as a range of 750-1000 dwellings however a figure of 900 dwellings is assumed by WCC in its estimates of sources of supply (ref paragraph 12.13). It is considered that this figure should be the one referred to in the policy to be consistent with the tables. However, any figure which is presented must be informed by an understanding of both the potential and the constraints of the site.

33. The second issue is the graphic used to identify the site. The whole of the site is shaded which gives the impression that all of it could be developed. The supporting text to the policy states that not all of the site is proposed or suitable for development (ref paragraph 12.13) and in that context in order to provide clear guidance in the Plan the graphic should more accurately reflect the site constraints, some of which are set out in the policy or supporting text e.g. the Flowerdown SINC (ref paragraph 12.17) and the Winchester-Littleton Settlement gap (ref paragraph 12.24). The settlement gap is also included in Policy NE7 but is not shown in the Plan. The land to the north and west of the site is of ecological importance and should also be shown as a constraint.

34. The site includes land which is currently providing much-needed green space within the Littleton Gap, as well as offering the potential for access to wildlife and outdoor pursuits for residents in the adjacent areas, such as Harestock where residents have very little green space within easy reach. The relatively unspoilt nature of this green space is likely to mean that the land has potential for supporting a wide range of flora and fauna, the loss of which would have an adverse impact on biodiversity."

35. The third issue is the lack of clarity on the area which WCC considers would be required to deliver 900 homes. In Policy W2 (iv), WCC make a clear distinction between previously developed land and undeveloped land within the site. In paragraph 12.13, WCC describes the site as 'much of the site comprises of previously developed land' but in paragraph 12.23 it is described as 'part of the site is previously developed land'. Paragraph 12.13 states that 'it is important to make full use of the site's potential within the constraints existing'. The site clearly has areas of built development, open areas, particularly along the north and western boundary which have a countryside character and areas of woodland. The Parish Council considers that there should be a consistent approach to describing the extent of the site which could be developed and that the existing constraints should be identified in the policy and shown on a detailed proposals map for the site.
36. The fourth issue is the reliance on a masterplan prepared by the landowner/developer to provide the planning framework for an important strategic site. See the relevant response to Policy D5
37. Within Policy W2 WCC propose a park and ride facility of approximately 850 spaces. The Parish Council have a number of issues with respect to this proposal.
38. It would be an extensive area of hard surfacing with associated infrastructure and lighting located in the countryside which would have a significant impact, on the landscape and drainage on a key approach to Winchester. The need for such a large facility has not been fully demonstrated by WCC. The existing park and ride sites are operating below their capacity. The projected demand for additional spaces is based on work which pre-dates the Covid pandemic which is having a significant impact on working practices and the need to travel to work (ref The Winchester Movement Strategy Feasibility Study July 2020 drafted in the early months of 2020). The Winchester Movement Strategy Feasibility Studies Phase 2 summary Report, July 2021, is the most recent report on the park and ride proposals for the City. The long-term case for a site at the Sir John Moore Barracks (SJMB) is re-affirmed despite the report stating that the likely demand scenarios on which the case is based are likely to be lower than the lower range of projected demand.
39. There is a lack of detail on how the park and ride scheme would be delivered and of its long-term viability. The Feasibility Studies Phase 2 estimated the cost of two schemes at the Sir John Moore Barracks (SJMB), one for 650 spaces at £6m and a second phase of a further 250 spaces at £2.3m. The consultants commissioned by WCC to consider the viability of the Sir John Moore Barracks (SJMB) site, as at September 2022, have not made any provision for the cost of the park and ride in their calculations. There is no indication of how the proposal would be funded and therefore there must be doubt as to the deliverability of the scheme.
40. In terms of the number of spaces proposed in Policy W2 and the studies which have informed the allocation there is an inconsistency which should be addressed. If the studies looked at 650-900 why does the policy propose 850?

**Object to Policy W2. The capacity of the site should be set out as 900 dwellings.**

**Object to Policy W2. There is a lack of detailed policy requirements to guide any future master planning process.**

**Object to Policy W2. The Winchester-Littleton Settlement Gap should be shown on a detailed site allocation plan.**

**Object to Policy W2 to the lack of an accurate graphic presentation of the existing site constraints and extent of previously developed land.**

**Object to Policy W2 and the supporting text which is inconsistent in terms of the description of the extent of previously developed land.**

**Object to Policy W2 and the reliance on a masterplan to provide the detailed planning framework for the site**

**Object to Policy W2 and the proposal for an 850 park and ride scheme, the need for which has not**

**been demonstrated, is not funded and therefore its delivery is uncertain.**

*Monitoring*

41. The Local Plan is seen by WCC as a key document to deliver sustainable development and support its ambitions to achieve a carbon zero district. The Local Plan will be subject to regular reviews between now and 2039 and understanding both the effectiveness of the policies and how successful (or otherwise) they are, will inform those reviews. How the monitoring of policies will be undertaken is set out in chapter at the end of the document. The focus appears to be limited to monitoring decision of planning applications and appeals. The Parish Council considers that a more comprehensive approach to monitoring should be set out which would assess the outcomes and the effectiveness of the full range of the Plan's policies and the decisions arising from them.

*Presentation*

42. The document is very long and would benefit from being edited to produce a more concise document, especially for ease of public accessibility. Additionally, many of the maps do not have a key which makes them difficult to understand.

*Conclusion*

43. We make our comments in good faith and trust that they will be considered in that way so that together we can safeguard and enhance the quality of our parish and the wider city given the many challenges that we face in the coming years.