



TERENCE
O'ROURKE

Rosemary Morton
Programme Officer
c/o Strategic Planning
Winchester City Council
Colebrook Street
Winchester, SO23 9LJ

20 June 2016

Our Reference: 143405C

Dear Ms Morton

**Winchester City Council Local Plan Part 2 Examination
Representation regarding land at Snakemoor Farm in respect to Matter 1**

- 1 This representation is submitted on behalf of Gleeson Developments Limited, Miller Homes Limited and Bloor Homes and relates specifically to the development potential of land at Snakemoor Farm. The representation seeks to address points raised within Matter 1 of the stage 2 hearings into the Winchester City Council Local Plan Part 2 (LPP2).
- 2 We believe that land at Snakemoor Farm continues to provide the opportunity for a sustainable housing allocation within LPP2, and that this land has not been appropriately considered due to the site assessment methodology adopted by Winchester City Council in allocating sites within LPP2.
- 3 The land forms the majority of the site included as SHLAA site 2019. The policies map identifies that the site in question is located in the countryside under policy MTRA 4 of the Local Plan Part 1 (LPP1). The policy states that in the countryside (outside built up areas and settlements covered by policies MTRA 2 and MTRA 3), only very small-scale development will be permitted. There is therefore no policy framework proposed within which this site or other sustainable sites prescribed as rural by MTRA 4 could be brought forward for sustainable development over the plan period. This is despite the housing requirement within LPP1 being out of date and its large-scale housing allocations not coming forward. We propose that Winchester City Council looks to address their housing requirement within LPP2, as outlined within Terence O'Rourke Limited's statement relating Matter 2.
- 4 An update to the Winchester SHLAA was undertaken in 2015, and the accompanying designations plan highlights that there are no landscape, ecological or heritage designations of any significance that would prevent the use of Snakemoor Farm for housing. This position is supported by a

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considerable amount of independent assessment work undertaken in previous years by the Partnership for Urban South Hampshire (PUSH) in testing the feasibility of a strategic development area in this broad location – crossing boundaries between Winchester and Eastleigh districts.

- 5 We believe the site assessment methodology adopted to allocate sites within LLP2 is unsound. Paragraph 2.19 of LPP2 states that any site not capable of accommodating 10 or more dwellings, or distant from MTRA 2 settlements were discounted on account of their low sustainability. The land at Snakemoor Farm is not located within proximity of an MTRA2 site, and is therefore concluded to be unsustainable. However, this is not because the site is distant from existing settlements, planned development and infrastructure, but because Winchester City Council has failed to look beyond its own administrative boundaries. We do not consider this to be a sound approach to assessing a site's suitability and sustainability. We consider the land to offer the potential to provide a highly sustainable residential development for the following reasons:
 - The site would provide easy access to the surrounding strategic highway network
 - The site is located within close proximity to Hedge End railway station (circa 1000m), which provides a regular service between Portsmouth Harbour and London Waterloo, and surrounding settlements (including Southampton, Fareham, Winchester, Eastleigh)
 - The allocation of the land will allow for the delivery of housing alongside necessary infrastructure and amenity provision not achievable on smaller infill sites, such as formal and informal open space, schools, local retail / community uses, healthcare and affordable housing
 - The land is directly adjacent to the permitted Boorley Fields development (ref: O/12/71514), which comprises of up to 1,400 homes, 4,355sq m of employment space, 375sq m of local retail provision, two-form entry primary school, community centre and public open space. There would be a clear opportunity for the site to form an extension to this development, supporting the permitted local service and amenity.
- 6 The SHLAA 2015 update highlights that the site could be delivered between 2020 and 2025, and we therefore question why the Local Planning Authority would wish to wait before considering it within any review of the LPP1, which would further delay sustainable housing delivery.
- 7 The housing requirement identified within LPP1 is now out of date and the LPP2 should be updated to reflect changes in circumstances and provide greater consistency with the NPPF (noting the substantial quantum of case law which now establishes the interpretation of the NPPF in respect of housing policy, which has been published subsequent to the examination of LPP1).
- 8 There is an urgent need to prepare a new SHMA to inform a review of LPP1, given the acute affordability pressures in the district (which experiences high house prices, a high ratio of entry-level house prices



against the average earnings of younger households, an increase in housing costs relative to earnings, and increasing numbers of households living in rented accommodation, shared homes and with parents).

- 9 LLP2 should therefore incorporate a sufficient degree of flexibility in its land supply by providing additional allocations for housing, to enable it to respond to the likely increase in the OAN once a new SHMA is either prepared by the Council or an alternative OAN is put forward by other parties through a s78 appeal. The land at Snakemoor Farm provides the opportunity to deliver further sustainable housing within Winchester, which can benefit from the existing infrastructure and approved developments coming forward across the boundary within the Eastleigh district.
- 10 Therefore in assessing the soundness of LPP2, as defined in paragraph 182 of the NPPF, and in answering the specific questions posed by the Inspector for consideration of Matter 1:

Will it satisfactorily and sustainably deliver the new development needed over the plan period to implement the objectives and requirements of LLP1?

No. LPP2 relies on the housing figures in LPP1 which are now out of date and the large-scale allocations in LPP1 have not come forward as expected. Winchester City Council should not wait on the review of LPP1 to allocate more sites to ensure greater levels of housing delivery. A greater allocation of sustainable housing sites, such as the land at Snakemoor Farm, is needed within LPP2.

It has not appropriately assessed all land within the legislative boundary of Winchester. Delaying this process until the review of LPP1 simply restrains development of suitable and sustainable sites, so it cannot be considered to satisfactorily and sustainably deliver the new development needed.

The Plan does not appropriately address housing and requires further allocations to be made. It is therefore highly susceptible to not being deliverable in the event sites do not come forward. In conjunction with this, the plan restricts further development due to its refusal to allocate sites other than on those sites close to MTRA 2 settlements due to their apparent unsustainability. This means that policy MTRA 4 of LPP1 takes effect and reduces housing deliverability on sustainable sites.

Has the plan been the subject of suitably comprehensive and satisfactory sustainability appraisal (SA) strategic environmental assessment (SEA) and habitats regulations assessment (HRA)?

Such assessments have been undertaken and would appear comprehensive. However, in assessing sites suitable for allocation within LPP2, the methodology employed is fundamentally flawed because it discounted all potential housing sites not in proximity to existing settlements as unsustainable, and failed to assess sites located at the authority's boundary differently. The result is that sites close to existing settlements, planned development and infrastructure, but located outside



of Winchester's administrative boundary, have been dismissed as unsustainable. This is therefore not picked up within the SA or SEA because it does not assess the methodology, which has led to the proposals within LPP2. The plan cannot therefore be deemed to be soundly prepared in accordance with the NPPF.

- 11 In concluding it cannot be said that the plan is positively prepared as it only seeks to achieve minimum housing delivery and restricts delivery of sustainable sites. It is not justified because there are clearly more positive strategies, underlain by clear evidence, in respect of housing delivery and sustainable site allocations that would deliver a greater number of homes. The plan is not effective because it doesn't look beyond its own boundaries or appreciates the scope of sites located in close proximity to settlements and infrastructure present within adjoining authorities. Finally, the plan cannot be deemed consistent with national policy because it looks to constrain sustainable development as opposed to support it. We therefore conclude the plan to be unsound.

Yours sincerely,



Thomas Southgate
Associate Director

cc	Andy Evans	Miller Homes Limited
	Scott Chamberlin	Gleeson Developments Limited
	Ron Hatchett	Bloor Homes