

# **Representations to Regulation 19 Winchester Local Plan Consultation**



ST PHILIPS

ON BEHALF OF ST. PHILLIPS

October 2024

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**Appendix 1 – Updated Vision Document for Park Farm, Land at Kiln Lane, Otterbourne**

**Appendix 2 – Local Housing Needs Assessment for Otterbourne**

**Appendix 3 – Inspector's Post Hearing Note to the North Norfolk Local Plan Examination**

# 1. Introduction

- 1.1 These representations are made to Winchester City Council (“**the Council**”) in relation to the draft Local Plan (Regulation 19) Consultation (“**the Consultation Plan**”) on behalf of St. Phillips.
- 1.2 By way of background context to these representation, St. Phillips and Langley House Trust are working together in the promotion of Park Farm, Land at Kiln Lane, Otterbourne (“**the Site**”). The Site is already known to the Council as the development potential of the Site has previously been considered in the Council’s Strategic Housing and Economic Land Availability Assessment 2021 (“**the SHELAA**”) under reference OT04. A Vision Document in support of the Site was submitted as part of our representations at the previous Regulation 18 consultation stage of the emerging Local Plan.
- 1.3 Further consideration of the merits of the Site are set out in Section 5 of these representations.

## Approach to the Representations

- 1.4 The National Planning Policy Framework (NPPF) states, at paragraph 35, that the tests of soundness that Local Plan and Spatial Development Strategies are examined against are as follows:
  - a. **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - b. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - c. **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - d. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 1.5 These representations respond to key parts of the Consultation Plan, highlighting the specific policy or paragraph, or supporting evidence document being addressed. They are structured as follows:
  - Section 2 addresses the Council’s overall Housing Provision within the Consultation Plan
  - Section 3 addresses the Council’s proposed Housing distribution and the over-reliance on Windfall development
  - Section 4 considers the sustainability and development suitability of Otterbourne
  - Section 5 address the Site, Land at Kiln Lane, Otterbourne
  - Section 6 provides the summary and conclusion.
- 1.6 This submission concludes that:
  - Insufficient housing has been planned for within the Consultation Plan to meaningfully address the housing affordability issues faced by Winchester District, which would require an uplift in provision over and above the starting position identified by the Standard Methodology.

- Insufficient provisions have been made in order for the Council to fulfil its Duty to Cooperate with other Authorities within South Hampshire, to assist in meeting their significant and well-established unmet housing needs.
- The Consultation Plan period should commence in the 'current year' reflecting national planning policy – 2024 at this stage – in order to reflect the affordability ratio which is applied as part of the standard need calculation. This would currently result in insufficient housing being planned for in the Consultation Plan and therefore the need for additional housing land to be identified. This is particularly the case if the Consultation is not adopted in 2025 meaning that the current Plan period would fall below the required 15 year period – an additional year of housing supply would also have to be identified.
- The over-reliance on windfall development in the Intermediate Rural Settlements is unjustified and contrary to historical trends, and would fail to deliver meaningful growth in these settlements.
- The reliance on the Review of Settlement Hierarchy 2024 to allocate sites, fails to recognise the greater sustainability merits of Otterbourne, and the need to address the specific needs and characteristics of the village.
- Park Farm, Land at Kiln Lane, Otterbourne is a deliverable site in the short term that can make a meaningful contribution to the housing needs of the district, and is ideally located to assist in meeting the unmet needs of the wider PfSH.

1.7 These representations are accompanied by an updated Vision Document – at **Appendix 1** – which demonstrates how the Land at Kiln Lane can be delivered to the benefit of the settlement of Otterbourne.

## 2. Housing Provision

2.1 **Policy SP2 (Spatial Strategy and Development Principles)** is heavily interlinked with **Strategic Policy H1 (Housing Provision)**. The following section of these representations responds to the total quantum of housing specified in the Consultation Plan. Overall, it is considered that Policies SP2 and H1 of the Consultation Plan do not positively plan for the significant affordability pressures within Winchester District, nor effectively plan to accommodate the needs for neighbouring authorities in the South Hampshire Urban Area, and are accordingly unsound.

### Standard Method / Housing Affordability

2.2 **Policy H1** of the Consultation Plan makes provision for some 15,115 dwellings (excluding the South Downs National Park area) during the Plan period (2020-2040). This figure is derived using the Government's Standard Methodology to establish the District's local housing need, and includes an uplift to accommodate a small proportion of the housing need from neighbouring authorities in the PfSH area (addressed in further detail, below).

2.3 It is accepted that, at this stage, the Consultation Plan is to be considered against the requirements of the current Framework and associated Standard Methodology for calculating the minimum housing need for the District. Nevertheless, it should be recognised that the proposed changes to the Framework resulted in a significant uplift in housing need from 676 dwellings per annum (dpa) to 1,099 dpa calculated using the proposed revised Standard Method and, based on the consultation draft revised Framework wording, would result in the Council needing to commence an immediate Local Plan review.

2.4 As set out in the **Planning Practice Guidance** ("PPG"), the current Standard Methodology identifies a minimum annual housing need figure (emphasis added), not a maximum housing requirement. The Council's **Housing Topic Paper (2024)** ("HTP"), which forms part of the evidence base for the Consultation Plan, acknowledges this, stating that the Standard Method figure may need to be increased to take account of unmet needs.

2.5 As it is a starting point for determining the level of need for the area, other factors should be taken into consideration in constructing the housing requirement figure, including constraints placed on the delivery of growth by land use designations, together with considerations such as the amount of land that is actually available for development, and any need to provide additional housing under the duty to cooperate.

2.6 Housing affordability is a significant issue within the District and one which has not been positively addressed in the Consultation Plan. The latest median housing affordability ratio for the district is at 13.19<sup>1</sup> and is in the top 5% of the least affordable districts to live in (outside London and the Isles of Scilly). Paragraph 9.36 of the Consultation Plan signposts that "*the affordability of housing in Winchester district continues to be a major issue and that the delivery of affordable homes remains a critical priority*". This is echoed in the HTP and updated **Strategic Housing Market Assessment (2024)** ("SHMA") which suggest that the need for affordable housing has increased to approximately 510 dpa (this equates to approximately two-thirds of the Council's Standard Method figure).

2.7 Despite the significant affordability issues, the HTP recommends that the Standard Method figure should not be increased to provide additional affordable housing, citing Government policy and market viability conditions as a limit to the amount of affordable housing that can be delivered.

<sup>1</sup> Table 5C of Ratio of House Prices to Workplace Earnings (2023) National Office of Statistics. Available at: [House price to workplace-based earnings ratio - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/economy/housingandconstruction/housepricesandaffordability/housepriceandaffordabilityratio)

2.8 The Council justify this approach by stating that the Standard Method figure already addresses affordability of housing provision through the application of the 'affordability ratio', and the application of Policy H6 (Affordable Housing) will require market housing developments to provide 40% affordable housing.

2.9 Firstly, whilst the standard methodology approach does include an affordability adjustment, the PPG is clear that the affordability adjustment applied in the standard methodology formula is not a solution to problems of affordability (our emphasis):

*"The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes." (Paragraph: 006 Reference ID: 2a-006-20190220)*

2.10 Secondly, the Council's Authority Monitoring Reports demonstrate that the Council has been unsuccessful in meeting their 40% affordable housing target as specified in Policy CP2 of the current Local Plan. This is shown in the table below:

Affordable Housing Completions

Year	Net Dwellings Delivered (inc. Affordable)	Net Affordable Dwellings Delivered	Percentage of Affordable Housing Delivered
2022-23	1044	382	37%
2021-22	1141	511	44%
2020-21	798	300	38%
2019-21	627	142	22%
2018-19	819	283	35%
2017-18	560	169	30%
2016-17	578	153	27%
2015-16	430	92	21%
2014-15	279	82	30%
2013-14	487	149	30%
2012-13	204	68	33%
2011-12	314	71	23%
<b>TOTAL</b>	<b>7281</b>	<b>2402</b>	<b>32%</b>

Source: Compilation of data provided within a number of Annual Monitoring Reports from this timeframe

2.11 Therefore, it is unjustifiable for the Council to continue to solely rely on the application of standard affordable housing policies to address housing prices and the unaffordability of housing during the next Plan period.

2.12 Overall, whilst the standard methodology will start to address issues of affordability, it will not properly address the long-standing affordability issues in the district. The Consultation Plan requires a more determined and focussed local policy response and an overall increased level of housing provision to address the longstanding problems of affordability.

2.13 Accordingly, it is considered that the Council's proposed strategy to address matters of affordability is not positively prepared and fails to take into account reasonable alternatives in providing for a greater level of housing in the District. **Policies SP2 and H1** should be amended accordingly.

## Duty to Cooperate with Partnership for South Hampshire Area (PfSH)

2.14 The HTP states that the Council is able and willing to accommodate some unmet needs from neighbouring areas, so far as possible, within the parameters of the Council's proposed development strategy. Consequently, **Policies SP2 and H1** include some 1,900 dwellings within the total housing requirement to contribute towards the unmet needs of neighbouring authorities within the PfSH area.

2.15 However, the unmet needs of the PfSH area are substantially higher, due to the significant constraints resulting from the South Downs National Park to the north, New Forest National Park to the west, and the Solent to the south. The latest calculation of housing need within the PfSH area is set out within the December 2023, Spatial Position Statement between the PfSH authorities (dated December 2023). The table below, reproduced from the December report, outlines the housing provision, per authority within the PfSH area.

Partnership for South Hampshire - Comparison of Housing Need and Supply 2022-2036

Local Authority	Annual Housing Need using Standard Method (dpa)	Total housing need 2022 – 2036	Supply = Commitments, local plan allocations + windfall estimate	Shortfall/ surplus
East Hants (part)	113	1,469	1,275	-194
Eastleigh	667	8,671	6,160	-2,511
Fareham	541	7,033	9,356	+900
Gosport	353	4,589	2,518	-2,071
Havant	516	6,708	4,105	-2,603
New Forest	1,056	13,278	8,076	-5,652
Portsmouth	889	11,687	11,304	-383
Southampton	1,475	19,175	15,951	0
Test Valley (part)	182	2,266	3,109	+743
Winchester (part)	234	3,055	3,055	0
<b>Total</b>	<b>6,037</b>	<b>78,481</b>	<b>64,909</b>	<b>-11,771</b>

2.16 It is clear that there is a substantial housing shortfall within the partnership area, amounting to nearly 12,000 dwellings over the period 2022-2036.

2.17 Prior to the publication of the 2023 position statement, Statements of Common Ground (SoCG) were published between the PfSH authorities which have previously concluded the following:

- Portsmouth, Southampton, Havant, Gosport, and the New Forest are heavily constrained and so are unlikely to be able to respond meaningfully to the overall scale of the challenge.
- Winchester, Fareham, Test Valley, East Hampshire, and Eastleigh have the potential to accommodate unmet needs, albeit to varying degrees.
- Eastleigh, and East Hampshire are physically constrained rendering their capacity to respond more limited.
- Winchester and Test Valley have the greatest potential to accommodate significant levels of unmet housing need arising within the PfSH area, in closest proximity to the main urban areas, and in locations served by public transport.

- Winchester and Test Valley should be planning to accommodate a significant uplift in their respective housing strategies to accommodate PfSH unmet need.

2.18 Winchester, together with Test Valley, is identified as an area most able to accommodate additional housing growth to address unmet needs from the PfSH, and we note that the provision made in the Consultation Plan for unmet needs from the PfSH area has been increased from that in the Regulation 18 Plan (an increase of approximately 450 dwellings). However, it is unclear how this increased 1,900 dwelling figure has been reached, and whether it could and should be higher.

2.19 The Framework is clear that authorities should establish to what extent identified housing needs, including unmet needs of neighbouring authorities, can be met. In this regard, the **HTP**, at paragraph 4.51, refers to the PPG which states that authorities are not obliged to accept needs from other areas where it would have an adverse impact when assessed against policies in the National Planning Policy Framework.

2.20 It is presumed that this is the basis that the Council are not proposing a higher contribution towards meeting accepted levels of unmet need i.e. that they consider there would be adverse impacts of doing so, but the evidence base is unclear.. The HTP sets out that the Council has tested and consulted upon four development strategy options and that Option 1 (distributing development to a sustainable hierarchy of settlements based on the existing Local Plan) scored well. However, how this strategy has translated into the level of development proposed for each settlement in the hierarchy / consistent with this strategy is not apparent.

2.21 The SHELAA demonstrates that there are a significant number of additional developable and deliverable sites (as confirmed by the Council itself) in the district which have not been taken forward for development. In Otterbourne, for example, a sustainable settlement towards the southern edge of the district and in very close proximity to the PfSH area, could deliver 297 dwellings based on paragraph 6.39 of the **Development Strategy and Site Selection Topic Paper**. Whilst we accept that this level of development may not be considered to be sustainable in this location, it is wholly unclear how the wider 'adverse impacts when assessed against policies in the Framework' have resulted in the limitation of development in Otterbourne to just 55 dwellings. It is anticipated that this position is also reflected in other settlements also.

2.22 Furthermore, it would seem that this 1,900 dwelling provision towards unmet needs has not been fully explored with adjoining authorities. For example, the Interim Statement of Common Ground between Winchester City Council and Havant Borough Council (August 2024) confirms that

*"Havant Borough Council notes that there has been no engagement between the Regulation 18 and Regulation 19 stages from Winchester City Council in order to address the matters raised in earlier representations or the letter of 5th March 2024. Havant Borough Council is mindful that the NPPF indicates that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for."*

*"Given the circumstances above, whilst Havant Borough Council will undertake a full review of the Winchester City Council Proposed Submission Local Plan (Regulation 19) as part of the 6 week public consultation, it reserves the right to raise concerns regarding the soundness and legal compliance of the plan through the consultation and examination. This would include amongst other matters consideration of whether the Duty to Cooperate can be considered to be met."*

2.23 Overall, the provision of 1,900 dwellings towards the unmet needs of neighbouring authorities is unjustified. In this regard, the Consultation Plan has not been positively prepared and cannot be considered to fulfil the Duty to Cooperate.

### Summary of Housing Provision

2.24 It is clear from the above that the Consultation Plan:

- Relies on the Standard Method for identifying local housing need as a maximum target rather than the minimum starting point position, as set out in national policy.
- Fails to provide an additional affordability uplift beyond the Standard Method in order to address the significant and worsening affordability of housing within Winchester district.
- Inadequately provides for unmet housing needs in the wider PfSH area and, therefore, the fails in its Duty to Cooperate.

2.25 It is therefore considered that the Consultation Plan fails to meet the test of soundness set out in the NPPF.

## 3. Housing Delivery

### Quantum and Distribution of Development

3.1 The spatial strategy for the provision of housing is set out **Strategic Policy SP2** of the Consultation Plan, reflecting the housing need and housing supply distribution position set in **Policies H1 and H3** respectively.

3.2 **Strategic Policy H3** of the Consultation Plan outlines the spatial distribution for this housing provision through the division of the district into three spatial areas: Winchester Town, the South Hampshire Urban Areas, and Market Towns and Rural Areas. We do not dispute this approach, as a matter of principle. However, the way this spatial strategy has then been translated into specified housing provision targets for different areas / settlements is unclear, specifically with regards to the provisions within the Market Towns and Rural Areas spatial area, and within that the Intermediate Rural Settlements.

3.3 Overall, Policy H3 sets out how the housing requirement identified in Policies SP2 and H1 is to be delivered. It makes provision for a total of 15,115 dwellings, of which 2,875 dwellings are specific new allocations, with the remainder coming from completions since 2020, existing commitments and windfalls. **Table H2 to Policy H1** confirms that 3,170 dwellings have been completed since 2020, some 21% of the total supply of the Consultation Plan.

3.4 It is questioned as to the appropriateness of the Consultation Plan period commencing in 2020 and thus the inclusion of completions since 2020 as part of the housing supply for the Plan period. The Council has been clear in the **HTP** that they have purposely started the Plan period at 2020 to enable the 'over supply' of these years to be captured.

3.5 However, the intent of the Standard Method for calculating housing need is to look forward whilst capturing and accounting for past housing delivery. The PPG is clear that the current year is used as the starting point for calculating housing need and that the affordability ratio for the current year should be applied. The affordability ratio is adjusted annually to reflect house prices and market signals, which are influenced by past housing completions delivered to the market – completions (and any theoretical 'over supply') have, therefore, already been accounted for in the affordability adjustment. As such, the start date of the Consultation Plan should be that of the standard method calculation, the current year, with the previous completions prior to this, not counting towards supply in the Consultation Plan, rather supply against the existing Local Plan provisions.

3.6 This particular point has been recently raised by Inspectors in the examinations of both the West Berkshire and North Norfolk Local Plans, with the Inspector in the latter examination, in a post-hearing statement, concluding that the base date of that Plan should reflect that of the date from which the housing need was calculated, April 2024 in that case. A copy of the Inspector's post-hearing note is provided at **Appendix 3** to these representations.

3.7 For Winchester, on the Council's current figures (which we do not accept), this would result in a standard method housing need over the period to 2040 of some 10,816 dwellings plus a further 1,900 provision towards unmet needs – a total of 12,716 dwellings. The housing provision in **Table H2** would amount to 12,295 dwellings (not including completions 2020-2023), and thus there would be a shortfall even on the Council's case relevant to the housing requirement.

3.8 Additionally, should the Consultation Plan not be adopted until 2026, which is not unrealistic given the remaining process to be followed up to adoption, then the Plan period would be required to be extended to 2041 in order

that the required minimum 15 year from period from adoption is covered. This would necessitate an additional year of housing land supply being identified.

3.9 **Policy H3**, and by implication **Policies SP2 and H1**, cannot therefore be considered to accord with national policy and should be amended accordingly, with the identification of additional housing provision being necessary.

### Market Towns and Rural Area

3.10 With specific regard to the Market Towns and Rural Area, the Consultation Plan provides for 3,825 dwellings broken down as follows: Market Towns (1,375 dwellings), Larger Rural Settlements (1,570 dwellings), Intermediate Rural Settlements (360 dwellings), and Remaining Rural Areas (520 dwellings).

3.11 Paragraph 32 of the Framework states that local plans and spatial development strategies should be informed by a sustainability appraisal throughout their preparation. The Council's **Integrated Impact Assessment Report (July 2024) ("IIA")** was produced to meet this requirement and, whilst logically concluding that Intermediate Rural Settlements should be expected to provide less housing than larger settlements, it clearly fails to identify how the apportionment of development was expressly determined.

3.12 **Paragraph 9.28** in the supporting text to Policy H3 provides a breakdown as to the general level of development that would be expected in each tier of the settlement hierarchy based on settlement assessments that have been undertaken by the Council. This paragraph goes on to state that:

*"The more sustainable 'market towns' have a higher overall housing provision with new allocations for an additional approximately 100 dwellings each. At the next level, the larger rural settlements, generally require new allocations of 90-100 dwellings each. The smaller 'intermediate' rural settlements have modest housing provision, as they do not benefit from significant commitments or completions."*

3.13 However, from the IIA and the other supporting evidence base, it is unclear why, in reference to the hierarchy of settlements, both Market Towns and Larger Rural Settlements have been allocated approximately 100 dwellings and 90-100 dwellings each respectively – the same level of housing – whilst no specific allocation split is made for Intermediate Rural Settlements even though new housing allocations are proposed. The justification in paragraph 9.28, to paraphrase, is that these settlements have modest housing provision going forward on the basis of modest commitments or completions previously.

3.14 With specific regard to the Intermediate Rural Settlements, this is not considered to be a justifiable position as it does not account for the relative sustainability of the settlements or account for what is actually needed in any settlement – it simply replicates what has previously happened.

3.15 We are aware that for Otterbourne, by way of example, Otterbourne Parish Council were asked by the Council to consider where some 50-60 dwellings could be accommodated. The Parish Council, in 2022, undertook a consultation exercise on this basis with the known SHELAAs sites in the parish being considered. However, it is not known what the justification for or basis was for the assumption of 50-60 dwellings by the Council being provided in the village. The Development Strategy and Site Selection Topic Paper (2024) simply states, at paragraph 6.40, that *"it is considered appropriate to identify a new site to deliver about 55 dwellings."* No other explanation is provided as to the justification of this level of development for Otterbourne.

3.16 This level of provision is also not reflective of the fact that all daily facilities/services cited in the **Review of Settlement Hierarchy 2024** are available within the settlement or within either comfortable walking distance or

reasonable cycling distance and as such, any development within Otterbourne would not need to rely on car travel to meet daily needs. The sustainability of Otterbourne has therefore been under recorded, making only 55 dwellings a significant under provision.

3.17 Furthermore, paragraph 68 of the Framework confirms that in providing an indicative figure at a neighbourhood level (as opposed to the authority as a whole), that figure should take account *“factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.”* We cannot see from the evidence base provided in support of the Consultation Plan that any specific ‘needs’ of the Intermediate Rural Settlements were considered.

3.18 Given the absence of this information / assessment, St Philips has undertaken its own Local Housing Needs Assessment focusing on the specific characteristics and needs of Otterbourne, and a review of the wider Intermediate Rural Settlements – refer to **Appendix 2** of these representations. This confirms that housing unaffordability is particularly pronounced in Otterbourne even in relation to Winchester District as a whole which has higher than the regional average house price to affordability ratios. Otterbourne has had no meaningful development in recent years which would contribute to affordable housing provision specifically and the supply of housing generally in order to address the affordability issues. Further consideration of the Local Housing Needs Assessment is provided in Section 4 of these representations.

3.19 In view of the above, it is considered that the spatial distribution of housing, as identified in **Policy H3**, is unjustified and fails to explain or justify how the total housing provision for the Market Towns and Rural Area spatial area and specifically the Intermediate Rural Settlements, has been determined, and whether this has accounted for the specific needs of those settlements for additional housing or the scope for increased growth to be sustainable accommodated. We consider that there is demonstrably scope and need for the Intermediate Rural Settlement group as a whole, and Otterbourne specifically, to be assigned a greater level of housing growth and Policy H3 should be amended to reflect this.

## Delivery of Windfall Development

3.20 **Table H3** of the Consultation Plan specifies that a windfall allowance of 1,725 dwellings has been included to help meet the Local Plan’s housing requirements. This is over 10% of the Council’s overall housing requirement during the Plan period, and some 37.5% of the total new housing provision being planned for in the Consultation Plan.

3.21 Paragraph 72 of the Framework states that where an allowance is made for windfall sites, these should be accompanied by ‘compelling evidence’ that these will continue to provide a reliable source of supply. The Council has produced a **Windfall Assessment Report (“WAR”) (February 2021)** to justify this substantial windfall supply.

3.22 Following a review of the WAR, it is considered that the Council over-estimates how much housing can be delivered via windfall development, specifically with regard to the provision included in the Consultation Plan for those settlements categorised as Intermediate Rural Settlements.

3.23 Only 46 net dwellings were completed between April 2012 to March 2019 in the now defined ‘Intermediate Rural Settlements’. Most of these dwellings (20) were delivered in one settlement (Waltham Chase) which was defined as a ‘Market Town and Larger Village’ in that period. This equates to an annual windfall delivery of 7 dpa.

3.24 The Consultation Plan proposes that, out of a total provision of 360 dwellings at this level of the settlement hierarchy, only 155 dwellings are to be delivered via planned allocations i.e. the remaining 205 dwellings are expected to come from windfalls. The Local Housing Needs Assessment for Otterbourne – **Appendix 2** of these

representations – identifies that the five settlements within this category of the settlement hierarchy have delivered a total of 24 dwellings for the period 2020-2023. When this is accounted for, the remaining 181 dwellings are to be delivered via windfall development. Using the Council's own data in the WAR, however, a windfall build-out rate of 7 dpa would only deliver 105 dwellings over the remainder of the Plan period (assuming that the Plan is adopted in 2025 as per the Council's LDS). This would leave an approximate shortfall in provision of some 76 dwellings in the Council's housing supply for the Intermediate Rural Settlements.

3.25 Furthermore, the Consultation Plan has been prescriptive in providing a breakdown of how and where this windfall provision is to be delivered; with a 20 dwelling windfall provision identified for each of the five Intermediate Rural Settlements. However, identifying specific windfall provision to each settlement would, firstly, seem at odds with the very nature of 'windfall' development where it is not possible to predict specifically where this development will come from and be located, and secondly, the evidence of past completions in these settlements would suggest that the level of windfall provision proposed is not reflective of past levels of completions.

3.26 As set out in the Local Housing Needs Assessment provided at **Appendix 2**, for Otterbourne, completions over the last 15 years from 2008-09 to 2022-2023 have only totalled 12 dwellings, an average of 0.8 dpa. If this average annual delivery was taken forward for the remaining 16 years of the Consultation Plan period, this would deliver less than 13 dwellings – a level materially lower than the windfall allowance attributed to Otterbourne.

3.27 Paragraph 69 of the Framework is clear that planning policies should be identifying "specific" deliverable and developable sites, but the Consultation Plan does not do this and instead chooses to include generic (and unrealistic) windfall allowances for these Intermediate Rural Settlements. The Council's own evidence points to the fact that there are sustainable, deliverable sites at these settlements that could be allocated in the Plan and eliminate the need for a windfall allowance in meeting the current proposed level of housing in the Consultation Plan, but also an increased provision on the basis that the Council is not proposing to meet enough of the unmet needs of neighbouring authorities. One such example would be Park Farm, Kiln Lane, Otterbourne (SHELAA site ref: OT04), and further detail of the sustainability and deliverability of the Site is provided in Section 5 of these representations.

3.28 A further reason why the Council should be seeking to identify specific sites for the delivery of housing, in the smaller settlements of the District, is that the evidence of past completions – refer to the Local Housing Needs Assessment provide at **Appendix 2** – is that windfall development largely comes forward in developments of 1 and 2 net additional dwellings, and almost exclusively providing less than 5 dwellings. Whilst this form and scale of development would be liable to Community Infrastructure Levy (CIL) contributions, they would not provide any affordable housing, or be of the scale to be able to provide any on-site community infrastructure, or contribute to off-site community infrastructure provision not covered by CIL.

3.29 Unplanned development at Intermediate Rural Settlements, including Otterbourne, would increase the overall population of the settlement, creating extra demands on existing infrastructure, but without delivering wider improvements to accommodate the growth. This is wholly unnecessary.

3.30 In view of the above, it is considered that the windfall provision included for the five Intermediate Rural Settlements is unjustified and contrary to Paragraph 72 of the Framework and should be reduced or eliminated and replaced with specific sites for allocation, including Park Farm, Kiln Lane, Otterbourne.

## Summary of Housing Delivery

3.31 It is clear from the above that the Consultation Plan:

- Does not accord with national planning policy, with the start of the Plan period not being the 'current year', the basis for calculation of housing need and, as a result, fails to address the full housing needs of the district.
- Fails to justify the distribution of development across the settlement hierarchy with specific regard to the level of housing allocated to the Market Towns and Rural Area.
- Unjustifiably and unnecessarily places a heavy reliance on the delivery of windfall development at the Market Towns and Rural Area, which is contrary to the evidence of historical trends and is therefore in conflict with Paragraph 73 of the Framework.
- Fails to positively prepare for promoting the sustainable growth of Market Towns and Rural Areas by not considering the wider benefits of allocated development in supporting and addressing the specific needs and characteristics of those settlements.

3.32 It is therefore considered that the Consultation Plan fails to meet the tests of soundness set out in the NPPF, and should be amended accordingly:

- The start date for the Consultation Plan period should be 2024.
- Table H2 of Policy H1: Housing Provision – Removal of completions prior to the current year and the allocation of additional sites for growth to account for the shortfall that would result, and a reduction in the windfall allowance to account for the elimination of specific windfall allowances from the Intermediate Rural Settlements.
- Table H3 to Policy H3: Spatial Housing Distribution – reduce the windfall allowance to account for the fact that historic trends for the Intermediate Rural Settlements show that windfalls will not deliver the quantum of housing envisaged.
- Policy H3: Spatial Housing Distribution – the level of specific allocations proposed should be increased generally in order to meet housing needs in full, and also reflective of the fact that Winchester District should be providing more housing generally, but specifically in the Intermediate Rural Settlements to account for the fact that windfall development in these locations will not deliver the level of housing envisaged.
- Housing Sources Tables for each Intermediate Rural Settlement – the windfall allowance should be deleted and replaced with specific additional allocations for housing, including Park Farm, Kiln Lane, Otterbourne (SHELAA site ref: OT04)

## 4. Otterbourne Settlement

### Sustainability of Otterbourne

4.1 Otterbourne is designated in the Consultation Plan, at **Strategic Policy H3**, as an Intermediate Rural Settlement. This categorisation is informed by the **Review of Settlement Hierarchy 2024** which scores the towns and villages across the district with regard to their services and facilities, and weights them accordingly. To provide context, daily facilities/services are awarded two points, whilst other facilities or services score one point. Each settlement tier requires a set range of points for a settlement to qualify for a tier.

4.2 As such, the scoring of facilities/services (as a measure of sustainability) directly influences a settlement's position in the hierarchy. This is reflected in the Local Plan process, as Parish Councils were asked to identify a set number of preferred sites, depending on how the settlement scored within the Settlement Hierarchy Review. For example, Intermediate Rural Settlements were only considered appropriate for modest housing allocations, albeit the specific amount is unspecified.

4.3 However, this broad approach to site allocations fails to account for the specific locational context of each settlement; it simply treats each settlement in isolation with no consideration as to what facilities may be accessible in neighbouring settlements within a reasonable walking or cycling distance, or whether the individual characteristics of the settlement mean more development could sustainably accommodated.

4.4 In the case of Otterbourne, the Hierarchy Review 2024 gives the settlement a score of 18 and therefore Otterbourne is characterised as an Intermediate Rural Settlement. However, the only daily facilities/services which are not contained within Otterbourne are a pre-school and main line train station. But these are in fact facilities that are available within the directly adjacent settlements of Otterbourne Hill and Shawford, providing a pre-school and main line train station respectively. The pre-school is just 800m south of Otterbourne accessed using direct cycle and footpath links, and the train station is just 3.0km away, a reasonable distance by cycle.

4.5 This means that all daily facilities/services are available within the settlement or within either comfortable walking distance or reasonable cycling distance and as such, any development within Otterbourne would not need to rely on car travel to meet daily needs. Reflecting the accessibility of these facilities properly would mean that Otterbourne would score a further 4 points using the Council's methodology, taking it to a total of 22 points. Using the Council's methodology, this would change its categorisation in the hierarchy to a 'Larger Rural Settlement'. As stated in paragraph 9.28 of the Consultation Plan, this category of settlement is proposed to accommodate larger allocations of up to 90-100 dwellings.

4.6 Conversely, other Intermediate Rural Settlements such as Sutton Scotney do not have mitigating factors to address their identified limitations such as a lack of bus service, train line or primary school and, therefore, would require car travel to meet these daily needs.

4.7 The consequence of the Hierarchy Review scoring outcomes being implemented rigidly has translated in to the Consultation Plan, when the Review itself acknowledges its own limitations (paragraph 5.2). The proposed allocation strategy places too great a reliance on less sustainable settlements, and not enough in more sustainable ones, such as Otterbourne, to facilitate additional sustainable growth.

## Otterbourne's Housing Needs

4.8 In addition to the relative sustainability of Otterbourne, the Local Housing Needs Assessment which accompanies these representations at **Appendix 2**, confirms that the specific housing needs and characteristics of the settlement of Otterbourne are such that additional development is justified.

4.9 Otterbourne has a population which has seen minimal growth since 2011, is older than average, and is continuing to age. It also has a larger average household size, with a high proportion of family households and over 66 households.

4.10 Dwellings in Otterbourne are larger than average, with a high proportion of households living in detached houses and dwellings with four or more bedrooms. Home ownership levels are very high in Otterbourne, and conversely there are relatively few households living in socially rented properties. Housing unaffordability in Winchester is high when compared to regional averages, and when considering median house prices and housing affordability ratios, and there is evidence to suggest that housing affordability is an even more pronounced issue in Otterbourne specifically.

4.11 Although housing delivery has been relatively high in Winchester District in recent years, housing delivery in Otterbourne specifically has been low, with only a net gain of 12 dwellings in the parish in the last 16-years. There are no outstanding housing delivery commitments.

4.12 Therefore, one reason for this unaffordability is the shortage of housing in the area, due to a lack of new housing supply. In addition, the housing that has been delivered, coming forward in developments of 1 and 2 net additional units, has not produced any affordable housing for the parish. Nor would it provide for a wider mix of housing sizes.

4.13 The Framework is clear that development should contribute to the objective of creating mixed and balanced communities, and the demographics and characteristics of Otterbourne suggest that this objective is not being met in this location. If additional housing provision, over and above the 55 dwellings currently proposed for allocation is delivered at Otterbourne, this would lessen affordability pressures and serve to generate a wider mix of housing than would otherwise be achieved through windfall development.

## Summary

4.14 The Consultation Plan has not been positively prepared in recognising the greater sustainability merits of Otterbourne and the need for additional housing, both in terms of quantum and mix, and for the provision of affordable housing in order to address the inherent housing characteristics and demographics of the village. Accordingly, further development should be allocated to Otterbourne, specifically Park Farm, Kiln Lane. Otterbourne is also ideally located to contribute to meeting the unmet housing needs of the PfSH area. As such, **Policy H3** and the associated **Otterbourne housing delivery section** of the Consultation Plan, to provide for additional development in Otterbourne.

## 5. Development on Land at Kiln Lane, Otterbourne

5.1 In response to the Council's Call for Sites in 2021, Park Farm, Land at Kiln Lane, Otterbourne ("the Site") was submitted to the Council and considered in the **SHELAA** under ref: OT04. Further consideration of the site was then provided through the Council's **IIA**. It should be noted that the ranking of the Site is shown as being the same as the proposed site allocation for Otterbourne, OT03, in all but one sub-category of one criterion, in relation to open space on the site which could be lost to development; more than 25% of the site is considered to contain open space, open county or registered common land which could be lost to development.

5.2 With specific regard to this point, whilst accepting that there is an historic Tree Preservation Order covering the Site dating from 1951 which identifies the majority of the Site as 'Otterbourne House Park', the association of the site with Otterbourne House to the north has long since ceased with the boundaries of the Site showing clear distinction between it and Otterbourne House. Furthermore, the Site is not publicly accessible. On this basis, it is not considered that there would be any loss of open space, open county or registered common land and the assessment of the site in the IIA should be amended accordingly.

5.3 The suitability of development on the Site is presented in the Vision Document, enclosed as **Appendix 1** to these representations. It demonstrates that a significant proportion of the site will be provided as open space which will be publicly accessible, which is not currently the case.

5.4 Along with the site being available and achievable, the key aspects of the Site that make it suitable for development are:

- The site is unconstrained by planning policies and is not within a Green Belt or National Landscape.
- It is not constrained by the National Parks unlike many other sites within South Hampshire.
- It is a natural and logical addition to Otterbourne, a sustainable settlement, located in very close proximity to the primary school, community centre and church.
- It provides opportunities for additional community infrastructure provision, with the proposal for a 'Park and Stride' area in the south west corner of the Site to support the primary school, as identified within the Vision Document masterplan.
- It is a site that is deliverable within the short term.

5.5 These findings are backed up by RAG system conducted by the Council as part of the SHELAA. This identified 22/24 of the constraints as Green and only two as Amber in relation to a Tree Preservation Order (see above) and Countryside. In comparison, the site proposed for allocation in Otterbourne has three Amber ratings. Overall, it was concluded by the Council that the site was deliverable for 68 units within a 5-year timeframe. Again, the Vision Document addresses the perceived constraints of the scoring and demonstrates how development can be delivered successfully.

5.6 Overall, it is evident that considered that the site is a deliverable site for housing in the short term. It is in a sustainable location at Otterbourne, a settlement which can and should sustainably provide additional development to contribute towards meeting the needs of both Winchester District, as well as unmet needs from neighbouring authorities in the PfSH area.

5.7 As such, it is considered that an additional site allocation should be made in Otterbourne, with the Consultation Plan amended accordingly. This would mean the inclusion of a further specific policy in the **Otterbourne section** (e.g. Policy OT02) of the Consultation Plan with the Otterbourne Housing Sources Table, currently on page 477 of the Consultation Plan being amended accordingly. This would necessitate consequent revisions to Policies SP2, H1 and H3 accordingly to account for the amended housing provision.

## 6. Summary and Conclusion

6.1 These representations respond to the Consultation Plan specifically in regard to the provision of Housing within the Plan. In this regard it is considered that:

- Insufficient housing has been planned for within the Consultation Plan to meaningfully address the housing affordability issues faced by Winchester District, which would require an uplift in provision over and above the starting position identified by the Standard Methodology.
- Insufficient provision has been made in order for the Council to fulfil its Duty to Cooperate with other Authorities within South Hampshire, to assist in meeting these significant and well-established unmet housing needs.
- The Consultation Plan period should commence in the 'current year' reflecting national planning policy – 2024 at this stage – in order to reflect the affordability ratio which is applied as part of the standard need calculation. This would currently result in insufficient housing being planned for in the Consultation Plan and therefore the need for additional housing land to be identified. This is particularly the case if the Consultation is not adopted in 2025 meaning that the current Plan period would fall below the required 15 year period – an additional year of housing supply would also have to be identified.
- The over-reliance on windfall development in the Intermediate Rural Settlements is unjustified and contrary to historical trends, and would fail to deliver meaningful growth in these settlements.
- The reliance on the Review of Settlement Hierarchy 2024 to allocate sites, fails to recognise the greater sustainable merits of Otterbourne, and the need to address the specific needs and characteristics of the village.

6.2 Park Farm, Land at Kiln Lane, Otterbourne is a deliverable site in the short term that can make a meaningful contribution to the housing needs of the district, and is ideally located for assisting in meeting the unmet needs of the wider PfSH.

## Appendix 1 – Vision Document for Park Farm, Kiln Lane, Otterbourne



# Land at Kiln Lane, Otterbourne

## **VISION DOCUMENT**

October 2024



ST PHILIPS



## 01 Introduction

Purpose of document  
St Philips  
Langley House Trust

## 02 Site and Context

The site  
Planning  
Landscape  
Ecology  
Heritage  
Access and Movement  
Drainage and utilities

## 03 Our vision

Vision  
Draft masterplan concept  
A. Providing community infrastructure benefits  
B. Protecting nature and enhancing biodiversity  
C. Creating a new high quality place to live  
D. Delivering a low carbon community

## 04 Conclusion

04

Thank you for taking the time to read through our vision document. If you have any questions or require any further information please do get in touch using the contact information below:



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Land at Kiln Lane, has been identified as having potential to provide a mix of housing including affordable housing and public open space as well as enhancing existing facilities and services in the village.

The site is in an enviable position, located very close to existing facilities including the village hall, primary school and church. It is physically unconstrained and adjoins existing housing development.

The location will preserve the pattern of the village and through high quality design will retain it's unique character and appearance.

The site is deliverable in the short term and could make a valuable contribution in meeting the housing needs of local people and contribute to a range of improvements to local infrastructure and public open space.



# 01 Introduction

## Purpose of document

This vision document has been prepared to explore the opportunities for land at Kiln Lane, Otterbourne. The contents of the document have been informed by;

- engagement with the Parish Council;
- technical studies carried out by a team of specialist experts;
- a vision for the site developed by St Philips and their consultants to create a bespoke, high quality place which integrates with and supports the existing village.

St Philips and the Langley House Trust are working together to secure a positive use for the site. The ideas in this document are meant as a starting point and will require further consultation and review to secure the best outcome for all.

## St Philips

St. Philips is an established land promoter whose reputation is built upon strong foundations of experience. Positively optimising the potential of our sites, we take a proactive approach by using our thorough knowledge of the planning system, technical solutions and industry requirements. With extensive combined knowledge of the sector, our experienced team utilise their connections and understanding to achieve the best possible outcome.

## Langley House Trust

Langley House Trust was founded in 1958 by a group of Christian men and women who were passionate about changing the lives of men leaving prison. Their mission is to support people who have offended or who are at risk of offending so that they reintegrate into society, live crime-free and thrive.





## 02 Site and context

Otterbourne is a thriving modern community with a good range of local facilities and services and good bus links to the wider area. The village has many active clubs and societies and numerous small businesses.

### Context

The site comprises an area of land which lies at the south eastern edge of the village. Figure 01 shows the site in context (see land edged red).

Otterbourne is a village with approximately 1,500 residents and is located to the southwest of Winchester, within the authority of Winchester District Council.

The site lies close to a number of facilities at the southern end of the village including the primary school, St Matthews Church and village hall. The local convenience store and post office (Nisa Store) and three public houses are also within walking distance of the site.

Otterbourne has its own recreation ground, children's playground, youth facilities, pavilion and football pitch located off Oakwood Avenue.

The site is bounded by existing residential development and has potential to gain access via Kiln Lane to the south. Furthermore there is a bus stop on Main Road, close to the site, providing good links to the wider area. Route no. 23 of the National Cycle Network runs along Main Road. This route runs from Reading to Southampton via Basingstoke, Alresford, Winchester and Eastleigh.

The route of a former Roman Road passes through the site although there is no evidence of this on the ground and it is not a feature immediately to the north or south of the site.



FIGURE 01 Plan showing the location of the village and the site in context



View looking north east across the site towards the back of Elderfield with housing in Otterbourne House Gardens visible on the right.



View looking southwest across the site towards Kiln Lane with the mature trees containing the site along the boundary with Kiln Lane.

## The site

The site is physically unconstrained and adjoins existing the residential area of the village on the western and northern boundaries. It is highly accessible and within walking distance of a number of existing facilities in the village.

The site (edged in red on Figure 02) measures approximately 3.3 hectares (8.2 acres).

The majority of the site is open grassland with areas formerly used for horticulture and storage in the western part. In the south western corner of the site there are two detached dwellings known as Park Farm and Wedgewood.

The boundaries to the site are well defined with a line of mature trees along the southern boundary with Kiln Lane beyond. South of Kiln Lane there are small number of properties defining the edge of built form for the village.

To the east is Dell Copse with a single dwelling, of the same name, fronting Kiln Lane.

To the north there are a number of residential properties including Otterbourne House, a mid 18C small country house which has now been converted to apartments. To the rear of the house a number of properties have been built including 1-6 Otterbourne House Gardens and a detached property known as Minstrels. The gardens of these properties form the northern edge of the site.

The western boundary of the site is defined by the rear gardens of a number of properties which front Main Road. These include Elderfield and Cheery Tree Cottage, both of which are Listed.

It is understood that the site originally formed part of Park Farm before being taken over by the Langley House Trust. The eastern part of the site, formerly known as the "Elderfield Ground" was used for 25 years by Top of the Hill Cricket Club to play junior cricket until around 2010. In recent years the land has been unmanaged and has become overgrown.



FIGURE 02 Aerial photograph of the site



Aerial photograph looking west across the site towards Elderfield and Main Road



Elderfield (Listed Building) to the west of the site



Existing outbuildings and hardstanding to the west of Elderfield, within the site



Aerial photo showing the existing outbuildings and polytunnels / growing areas within the site and Elderfield and housing on Main Road beyond



Aerial photograph looking south west across the site with existing properties Elderfield, Park Farm and Wedgewood in the background



Horseshoe Cottage on Main Road, west of the site



Cherry Tree Cottage (Listed building) on Main Road, west of the site



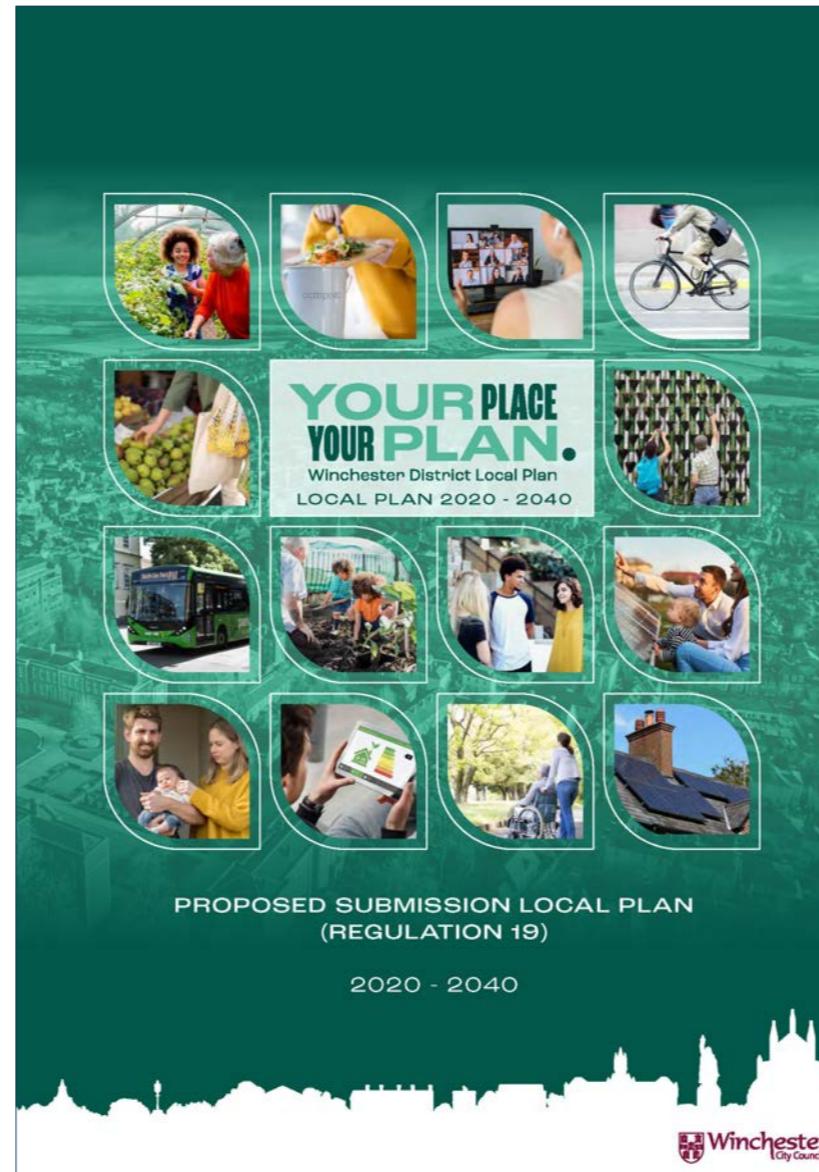
Otterbourne House (Listed building) on Main Road, north west of the site

## Planning

“The Development Plan” is made up of a number of documents, including the Local Plan Part 1 (2013) and Local Plan Part 2 (2017), which collectively provide the planning policy context for the future of the village up to 2031. Key parts of the Development Plan are now under review.

Winchester District Council (“WDC”) is in the process of producing a new Local Plan which will, amongst other things, provide for its housing requirements in the period to 2039 (identified as a requirement for approx. 14,000 homes). The district is also adjacent to the Partnership for South Hampshire (“PfSH”) area - an area with significant unmet needs for housing (the PfSH Statement of Common Ground dated October 2021 confirms that this shortfall totals some 13,000 homes). Having regard to the duty to co-operate that applies to all local authorities, it is reasonable to assume that Winchester District will additionally have to accommodate a proportion of these unmet housing needs where it is possible to do so on appropriate sites located close to the PfSH area.

To inform the emerging Local Plan and site allocation process, WDC identified a potential scale of housing that might be attributed to each Parish. For Otterbourne, that potential share of the district-wide requirement i.e. excluding any allowance for unmet needs from the PUSH area, was identified as 50 – 60 homes. WDC also produced a Strategic Housing and Economic Land Availability Assessment (2021) that identified a series of possible housing sites adjacent to and in the vicinity of Otterbourne (Site Refs: OT01 to OT08). Site Ref OT04 (Park Farm, Kiln Lane) was identified by WDC as available and suitable for housing, and able to deliver this housing within 5 years.



In a letter to WDC in late May 2022, Otterbourne Parish Council indicted that it had concluded that the allocation, in part, of Site Ref OT03 (Land east of Main Road) would best meet the need for housing. However, that letter also confirmed that Councillors had more recently met with a representative of St Phillips Land in relation to Site Ref OT04 (Land at Park Farm, Kiln Lane) and that the Parish Council was not closed to this alternative option, which it accepted was sustainably located in terms of its proximity to the village amenities and with the potential to offer community open space benefits. The questions the Parish Council raised at that time related to potential vehicular access and traffic generation issues.

Against this background, this Vision Document is intended to again confirm the availability and suitability of land at Kiln Lane (Site Ref OT04) for housing but also, having regard to more detailed technical and masterplanning work that has been carried out since May 2022, to demonstrate that the highways (and other technical) impacts of the development are acceptable and, importantly, that it could, alongside new housing, deliver a series of unique community and local benefits. This detail is set out in the following sections of this document.

## Landscape

A sensitive landscape design will ensure that development on the site can be accommodated without detriment to the localised or wider visual amenity, and the preservation of the integrity of the receiving landscape character and visual environment. Proposed landscape features will contribute positively to the wider landscape character.

The site is not subject to any qualitative landscape designations, it is partially developed and keys naturally into the established settlement edge. The site is considered to reflect an ordinary landscape and has been assessed as being of low / medium value, with a low / medium landscape sensitivity, with good potential for development, in part, owing to a reduced susceptibility of change to the nature of change proposed. The extent of woodland cover near and adjacent to the Site and within the general locality, along with the mature vegetation structure to the Site boundaries, reinforces the compartmentalised character and a high degree of enclosure and will assist with the integration of future proposed built form on the site.

The site is not publicly accessible and has become overgrown by grassland and scrub which are considered to be of relatively limited landscape value. As such, there are clear opportunities for landscape enhancements. The existing vegetation structure and woodland to the boundaries are the key landscape components of value and should be retained and reinforced.

The site has the capacity to accommodate a sensitively designed development that would not be out of context with the existing village edge and presents opportunities to improve the management of the existing boundaries and enhance the local and wider landscape through habitat creation and biodiversity net gain.

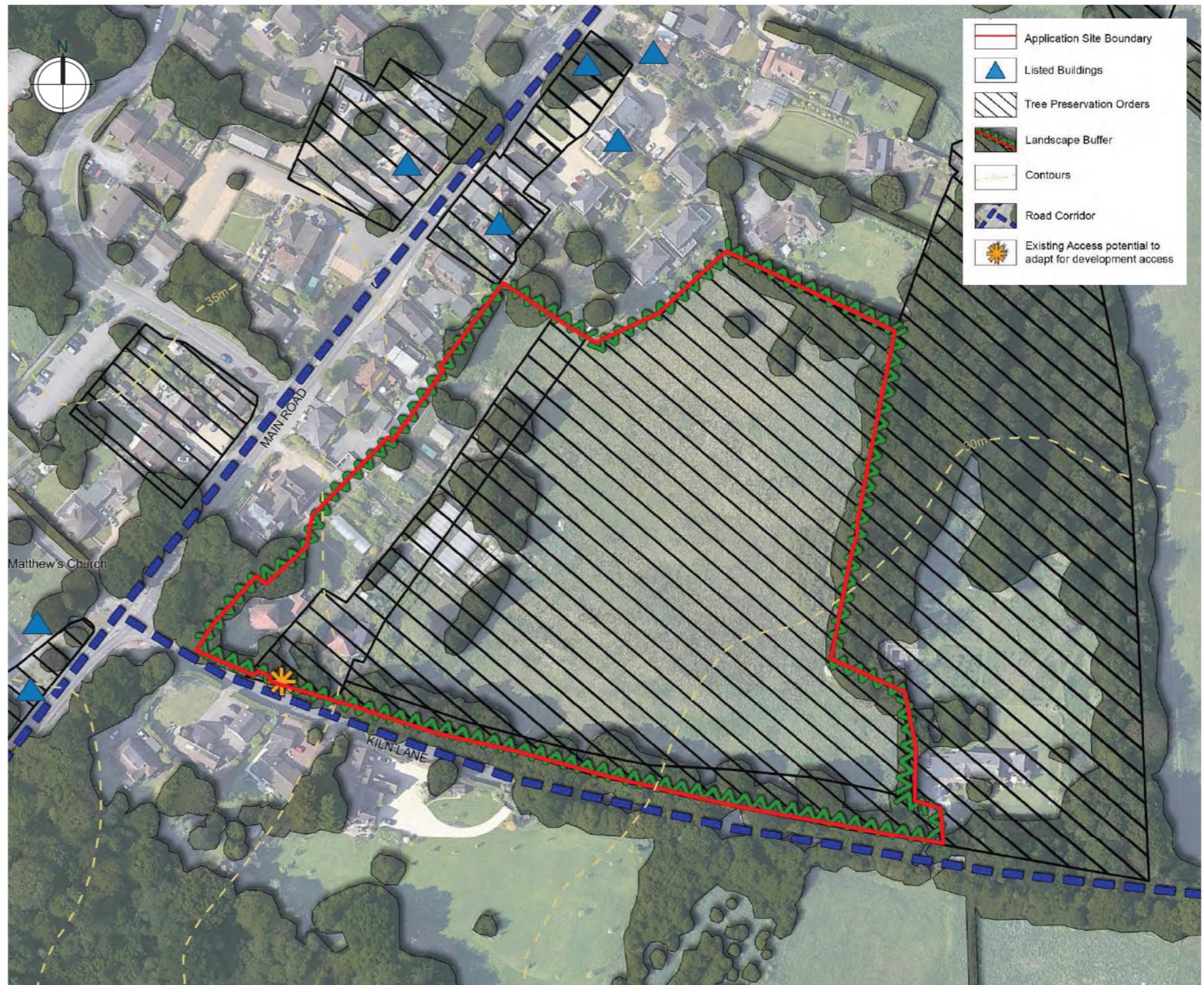


FIGURE 03 Landscape constraints plan (Aspect Landscape)

# Ecology

The site currently has relatively low ecological value and opportunities exist within the site to provide measurable net gains for biodiversity in the area.

The site itself does not contain, nor is it located immediately adjacent to any identified ecological designations. Nonetheless, it is situated within the Zone of Influence associated with the River Itchen Special Area of Conservation (SAC), with particular reference to potential for water quality impacts and eutrophication caused by new residential developments. Accordingly, any proposed development of the site will need to ensure that suitable mitigation is in place, including nutrient neutrality in line with the current guidance in regard to the SAC.

The internal areas of the site include existing dwellings, horticultural areas and grassland, which are unlikely to represent significant ecological constraints. More valuable ecological habitats are present, provided the existing boundary vegetation and mature trees (including veteran tree) and orchard areas. These are to be retained as part of a sensitively designed masterplan. Potential exists for enhancement measures to be incorporated into a sensitively designed development masterplan, including through new habitats and targeted management for the benefit of wildlife within these areas.

Ecological review of the fauna potential of the site identifies that any proposed development should retain key corridors and features identified as likely to be of raised value to faunal species in the local context (particularly the existing mature boundary vegetation, mature trees and orchard areas). However, the opportunity exists under a sensitively designed development scheme to incorporate new wildlife habitats and faunal opportunities as part of a comprehensive open space/green infrastructure scheme.



FIGURE 04 Ecological constraints plan (Aspect : Ecology)

## Heritage

There are no designated heritage assets within the site boundary but there is archaeological potential and Listed buildings on the Main Road to the west of the site which need to be protected.

A settlement at Otterbourne was recorded in the Domesday Book of AD1086. It was focused around the original church and former manor house complex, now a Scheduled Monument, c450m to the east and Otterbourne Park Wood, a hunting park, to the south. The Romans built a road between Winchester and Bitterne/Southampton that was partially visible until the 19th century when the projected route was mapped through the eastern part of the site.

However, there is no intervisibility with the Scheduled Monument and the site is not a significant part of its setting. There is also no evidence of the Roman Road on the ground at the site and it is not a feature immediately to the north or south of the site. Archaeological investigation options can be employed throughout the development process to comply with the National Planning Policy Framework and the Local Plan. Any such investigations can add to our understanding of the history of Otterbourne and the information used to positively contribute to the area's character.

The Listed buildings are concentrated along Main Road, reflecting a 19th century shift in the focus of the settlement, and are of value principally because of their historic and architectural interest. The site is either not significant to the setting, suitably distanced or well-screened from the majority of these. Only Elderfield is considered sensitive to impacts from the proposed development due to the loss of open space within its setting. Sensitive design, reinforcement of tree-screening and a landscape buffer on the western boundary will reduce the impacts as far as possible.



FIGURE 05 Plan showing the location Listed Buildings and the Conservation Area in relation to the site

## Access and movement

Vehicular access to the site can be achieved from an existing access point via Kiln Lane. Sustainable travel connections can be made to the local and wider area on foot, cycle and bus.

There is potential to improve an existing vehicular access from the highway at Kiln Lane, providing suitable vehicle access to the proposed development. Traffic surveys demonstrate that an access point can be safely achieved. A new pedestrian and cycle link is also proposed in the south-west corner of the site, linking directly to the extensive pedestrian and cycle provision on Main Road and Otterbourne Hill.

The provision of a park and stride facility as part of the scheme, and the proposed access arrangements have been reviewed by Hampshire County Council Highways Authority as part of pre-application discussions.

The site is ideally located to local facilities in the village, and sustainable travel connections can be made to the local and wider area on foot, cycle and bus. There are a large number of services and facilities within easy walking / cycle distance of the site with access to higher tier services in Chandlers Ford, Southampton and Winchester available via regular high-quality bus services which pass close to the site. The National Cycle Route No.23 also passes through the centre of the village linking to Eastleigh and Southampton to the south and Winchester to the north. Furthermore, there are railway stations, close to the site at Shawford and Eastleigh providing for onward connection to the national rail network.

### KEY FACILITIES (see plan for location)

1. Otterbourne C of E Primary School
2. Thornden Secondary School
3. Bright Horizons Day Nursery
4. Nisa Local Store / Post Office
5. Otterbourne Village Hall
6. St Matthew's Church
7. Oakwood Park Recreation Ground
8. Nuffield Health Wessex Hospital
9. The White Horse PH
10. The Old Forge PH
11. The Otter PH

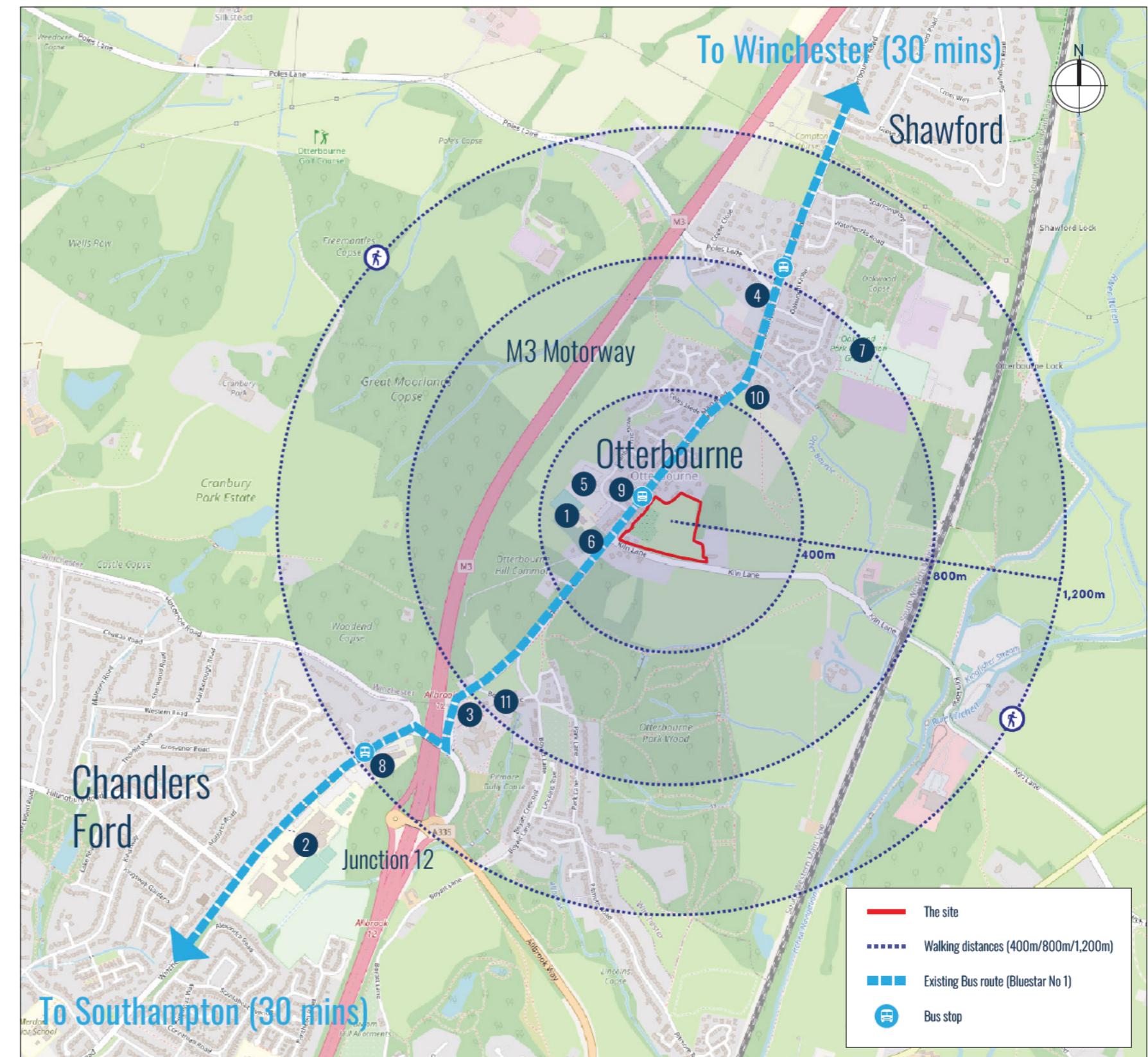


FIGURE 06 Plan showing the proposed access strategy

## Drainage and utilities

The site is not within an area at risk of flooding and if developed with an appropriate drainage strategy will not increase the risk of flooding outside of the site. The introduction of formal sustainable drainage will actually reduce the future flood risk downstream of the development by retaining and controlling the flow of water.

### Flood Risk

The Environment Agency mapping shows the site to be located entirely within Flood Zone 1 and at 'very low' risk from both fluvial and surface water flooding, defined as land having less than a 1 in 1000 annual probability of river or overland flooding (<0.1% Annual Exceedance Probability).

### Drainage

The four key objectives of Sustainable Drainage Systems (SuDS) design are to achieve improvements in water quantity, water quality, amenity provision and biodiversity. Surface water runoff from the development should be attenuated and disposed of as high up the following hierarchy as reasonably practicable:

- i. into the ground (infiltration);
- ii. to a surface water body;
- iii. to a surface water sewer, highway drain, or another drainage system;
- iv. to a combined sewer.

Whilst investigations are ongoing, the site is looking to deliver attenuation drainage in the form of a basin. The built element of the development should look to introduce a suitable water conveyance system, such as swales, in order to further treat the water and greatly enhance quality which benefits the downstream system.

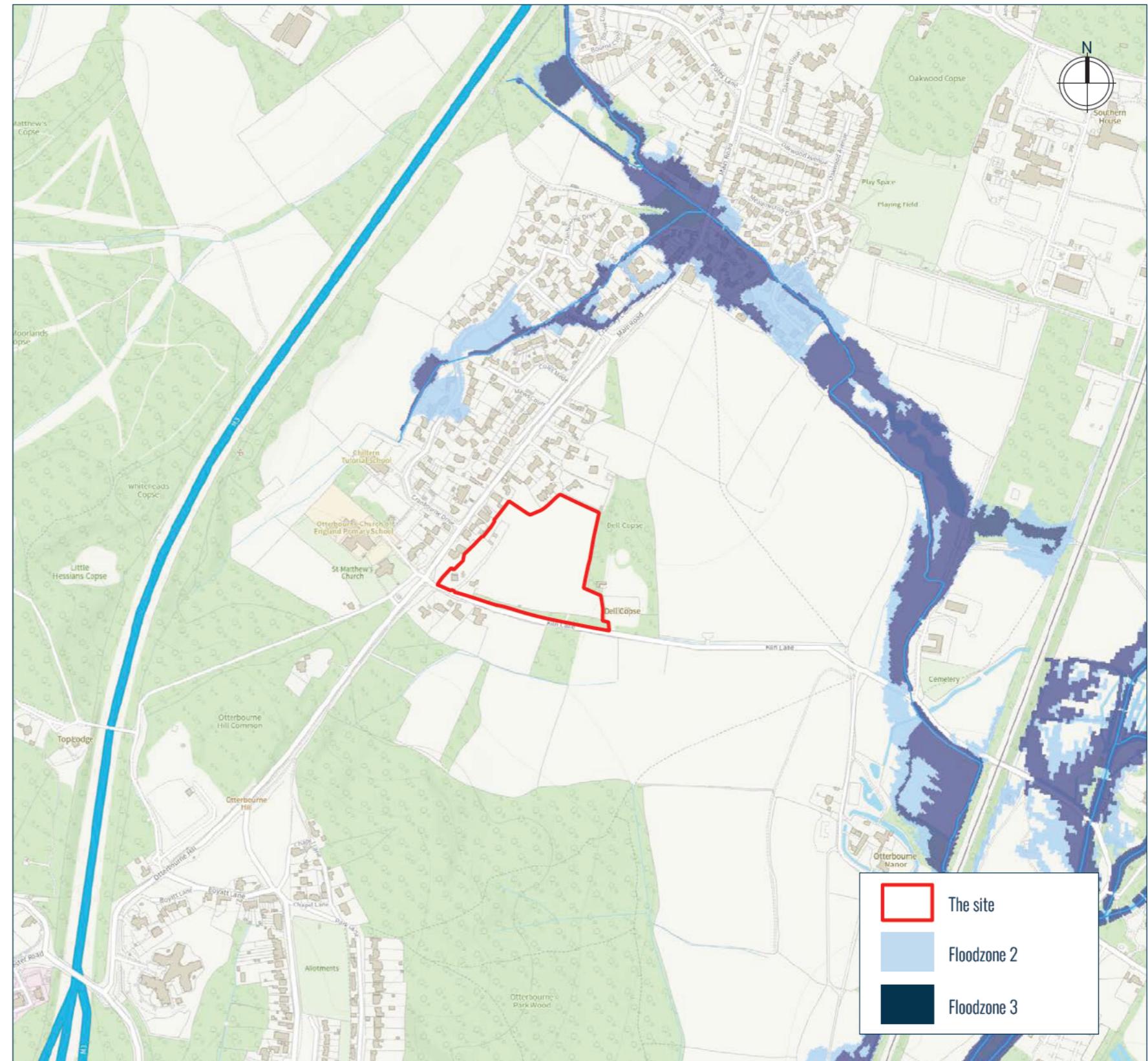


FIGURE 07 Plan showing flood risk in the location of the site (Source: <https://flood-map-for-planning.service.gov.uk/>)



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**Land at Kiln Lane can deliver a sustainable new development offering a range of high quality housing and public open space for recreation and ecological enhancement for existing and future residents, with good connections to the local area.**

## 03 Our vision

Based on our understanding of the site, the needs of the village and the aspirations of the local community we have created a vision and draft masterplan concept for the site. This vision is the starting point for engagement with key stakeholders and the local community.

## Vision

Our vision is based on 4 key objectives which are drawn together and illustrated by a draft masterplan concept. The draft masterplan concept is a starting point for the development scheme and will continue to evolve and be refined over time to make sure it delivers the best solution for the site and the village.

#### A. Providing community benefits

We have identified a number of benefits which the scheme can bring to the local community. Through further engagement these can be discussed and refined to make sure they are right for the scheme and the village.

## B. Creating a new high quality place to live

The proposed development can embrace best practice in placemaking to ensure that a high quality environment is delivered across the site to benefit both existing and future residents.

### C. Protecting nature and enhancing biodiversity

With significant areas of public open space being provided, there is a strong emphasis in the proposals to, where possible protect the natural environment and enhance it's biodiversity.

## D. Delivering a low carbon community

There is a good opportunity to deliver a new low carbon community at the site which reduces demands for energy, where possible promotes renewable sources, and provides a sustainable environment for its residents.

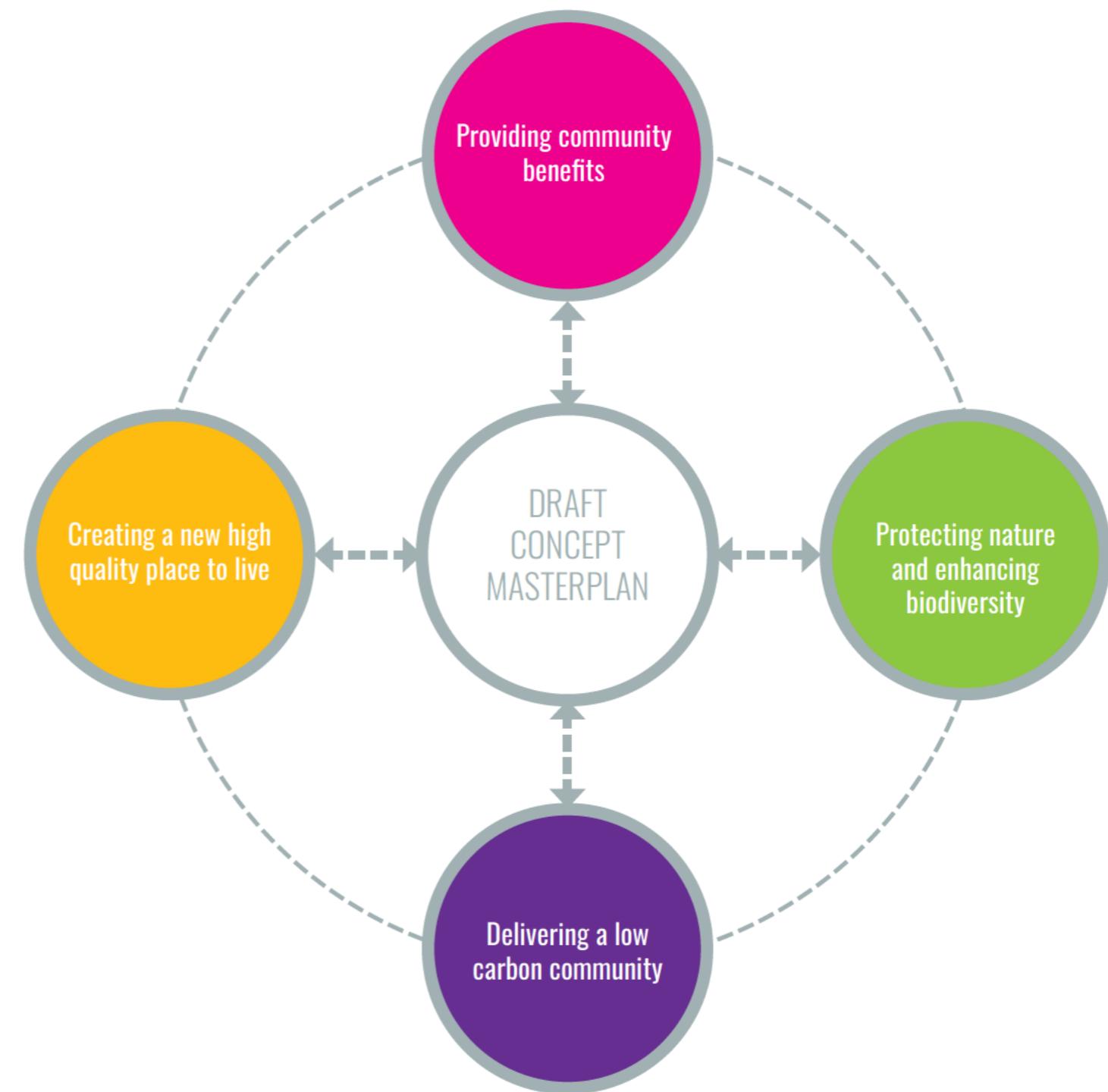


FIGURE 08 Draft Masterplan Concept



## Draft Masterplan Concept

The draft masterplan concept plan (Figure 08) shows how a mix of housing and public open space could be accommodated within the site. It also shows how the scheme could integrate with the village with new linkages and landscape planting.

The draft masterplan concept is based on the known constraints and opportunities and is a starting point for engagement with the key stakeholders. Additional details and information will be provided as the proposals develop further. The draft masterplan includes the following key elements:

### KEY TO PLAN

-  Site boundary
-  Public Open Space / Green Infrastructure
-  Site for community / education use
-  Potential for extended gardens for Elderfield (Care Use)
-  Housing development area
-  Vehicular access
-  Pedestrian / cycle link

- 1 Retention of the existing landscape features within the site and on its edges, reinforced where required to protect the amenity of existing residential properties which back onto the site
- 2 Provision of additional landscape planting on the edges of the site to help mitigate long distance views to the site
- 3 Vehicular access from Kiln Lane via a new priority junction
- 4 Potential for a new pedestrian / cycle connection to Main Road from within the site
- 5 Provision of significant areas of natural greenspace on the northern and eastern edges of the site to provide public open space and improvements to biodiversity
- 6 Up to 60 houses including affordable housing at an average density of circa 30 dph and a mix of housing types including 2,3,4 and 5 bedroom houses and bungalows with a small number of 1 and 2 bedroom apartments
- 7 An area for potential food growing such as allotments, a community growing area or orchards
- 8 Additional footpaths around the edges of the site with potential for a trim trail and informal areas of natural play for young children
- 9 Sustainable Urban Drainage features within the public open space
- 10 Provision of a Park and Stride facility for the school and other community facilities.
- 11 Land identified for the potential expansion of the garden area for Elderfield (Care Use)

## A. Providing community benefits

Development of the site can bring forward a number of key benefits to the existing village and the local community. We are keen to work with the community and Parish Council to see how we can deliver these.

St Phillips and the Langley House Trust have been active in their engagement with various parties, including Otterbourne Parish Council, to identify how the development of the site can best contribute towards both providing and improving local community infrastructure for the betterment of existing and future communities of Otterbourne. Early engagement has demonstrated that there is a preference for additional off-street parking space to relieve pressure on the public highway network, particularly during times of pick up and drop off associated with the local Primary School. In response, the concept masterplan includes space to accommodate a 'Park and Stride' car parking area in the south western corner of the site.

This is considered to be the main option at this stage, but alternatives, outlined on the following pages of this Vision Document, could be provided and we will continue to seek to work with stakeholders in this regard.

### 1 Village car parking / Park and Stride



With such close proximity to the school, there is an opportunity to provide an area of informal car parking which could be used for a range of activities including, parking for the church, short term car parking for parents and carers taking their children to school and parking for visitors to the village talking walks or using the public open spaces.

It is understood that the school advocates a "Park and Stride" with a small number of dedicated parking bays being provided by The White Horse PH and the Old Forge PH. Further parking within the site could support and expand this.

### 2 Community growing areas / orchards



It is recognised that part of the site is a former orchard. A community growing area or orchard could be established, which would represent a valuable resource to the village, the Parish, and for visitors in the wider area.

In recent years there has been a surge of interest in growing your own food. This has led to a big rise in demand for allotments as more and more people recognise the multiple benefits of being an allotment holder. Having a local space to grow fresh, affordable food, meet others, share tips and knowledge, stay active and cut food miles, are all things that appeal to an increasing number of people. Allotments and community gardens provide valuable green spaces and community assets that offer opportunities for people to grow their own produce, improve their health and wellbeing, take action to reduce carbon emissions and foster community cohesion and inclusion.

This area could also create new habitats for wildlife and enhance biodiversity.

### 3 Heritage trails / circular walks



The village could use the site as part of a series of circular walks for local people and visitors to the village. There are many popular routes in the local area both to the east towards the Itchen Navigation and west toward Cranbury Park and Hursley.

This could be achieved using information provided on the Parish Council web site, leaflets, social media and display boards within the site or village. The site may also provide a small informal parking area for walkers which would avoid conflict with existing and future residents.

Information and signage boards could also provide information for visitors and the community on aspects such as ecology and wildlife, history and wayfinding.

Walks could be informal or organised and help promote exercise, education and support local facilities such as the public houses or shops.

### 4 Provision of high quality green infrastructure for all



In addition to the potential sports facility, areas of informal public open space within the site which could be used for a variety of activities including:

- Meeting places for friends and relatives
- Natural play areas for young children
- Informal play / kickabout areas
- Picnic areas
- Exercise and dog walking
- Community events
- Education on issues such as ecology, history or health and wellbeing

### 5 Improvements to the community facilities



There is potential for financial contributions towards existing community facilities in the village and the public open spaces within the site could also be used with these facilities for activities or events.

## 6 Affordable homes



It is recognised that in highly sought after locations to live, such as Otterbourne, being able to stay in the village and afford your first home or moving to a larger family home is challenging.

Properties in Otterbourne had an overall average price of £537,738 over the last year. The majority of sales in Otterbourne during the last year were detached properties, selling for an average price of £917,092. Flats sold for an average of £258,500, with terraced properties fetching £329,400.

As part of any new housing development, an element of affordable housing will be provided. It is envisaged that the design of the affordable homes will be of the same quality as market housing and will be integrated into the scheme as a whole. The mix of affordable housing will include both socially rented and shared ownership.

In accordance with the local plan a minimum 30% of the proposed dwellings would be provided as affordable homes on the site. In addition the scheme could provide a number of smaller units which would be more affordable for young people looking to buy a property to remain in the village.

## 7 Bungalows and homes for the elderly



It is recognised that there are limited opportunities for people to downsize to smaller units or bungalows as their needs change.

There is an opportunity to provide a both smaller units and bungalows within the site which could help older people remain in the village, close to their families and continue to play an active part in its community for longer.

## 8 Long term management



The ownership and long term management of aspects of the development could be gifted to the Parish Council who could maintain the quality of the place.

The community could develop new ideas for the spaces and how they will be used both now and in the future.

Contributions could be secured as part of the development process to assist in the funding of maintenance and long term management.

## 9 Education and information



There are opportunities within the areas of public open space to provide information for visitors and the community on aspects such as ecology and wildlife, history and wayfinding.

There is also the potential to create a bespoke area within the open space to provide a dedicated learning area / outdoor classroom with seating. This could be used by the local primary school which is only a short walk away.

## 10 11 12 13 Other benefits?



The proposal would of course provide a range of financial contributions to be agreed through a S106 legal agreement.

St Philips Homes would be keen to discuss the potential for the scheme to make proportionate financial contributions that help to address identified needs within Otterbourne.

We are keen to work with the community and Parish Council to understand what other opportunities the development could assist in delivering.

## B. Creating a new high quality place to live

A set of design principles will ensure delivery of high quality placemaking for the site.



### Reinforcing the integrity, identity and character of the place

- Provide a form of development which responds to and reinforces the character of Otterbourne, drawing on the variety of materials and built form in the historic parts of the village
- Respect the setting and appearance of heritage assets in the local area including the Listed Buildings to the west of the site
- Ensure that the development respects the existing community, their amenity and way of life
- Deliver best practice in urban design and landscape, conserving and enhancing existing features whilst creating opportunities for people to interact with community and green spaces



### Delivering a high quality, multi-functional green infrastructure

- Maximise the health and wellbeing benefits of green infrastructure through creating an ecologically rich landscape network



### Integrating a blue infrastructure across all aspects of the development

- Ensure that development proposals do not have a detrimental impact on flood risk in the local and wider area
- Deliver an interconnected blue and green infrastructure strategy which provides opportunities for ecological and landscape enhancement
- Factor in climate resilience through natural water retention and re-use techniques
- Promote a liveable urban environment through rejoicing in water's recreational value and contribution to living environment



### Creating well designed places for people to live and work

- Provide a mix of housing types and tenures to encourage diverse and intergenerational communities
- Deliver both physical and social infrastructure to benefit existing and future residents and support the growth of the town as a whole
- Create beautiful homes with gardens that combine the best of town and country to create healthy communities



### Delivering sustainable patterns of movement with good connections to existing and new facilities

- Provide a network of safe and high quality routes from within the site to the wider area to encourage walking and cycling
- Provide linkages through the site for existing residents to use to access new and existing facilities



### Meeting the challenges of climate change

- Contribute to a low carbon and climate resilient development from construction to occupation through sustainable materials and construction techniques, renewable energy measures, sustainable drainage systems within a comprehensive blue-green infrastructure network and mobility strategy

## C. Protecting nature and enhancing biodiversity

Protecting the natural environment and encouraging biodiversity are key elements of creating a sustainable place to live. There are many opportunities to enhance the ecological value of the site.

As part of the development proposals for the site there are a number of ecological enhancements which will benefit the local biodiversity. The ideas for enhancement below are considered appropriate given the context of the site and the scale and nature of the proposals, and can be refined as detailed proposals are brought forward. Through implementation of the following ecological enhancements, the opportunity exists for the proposals to deliver a number of biodiversity benefits at the site.

### Habitat Creation

It is recommended that where practicable, new planting within the site be comprised of native species of local provenance, including trees and shrubs appropriate to the local area. Suitable species for inclusion within the planting could include native trees such as Oak, Ash, Birch *Betula pendula* and Field Maple, whilst native shrub species of particular benefit would likely include fruit and nut bearing species which would provide additional food for wildlife, such as Blackthorn, Hawthorn, Crab Apple *Malus sylvestris*, Hazel *Corylus avellana* and Elder. Where non-native species are proposed, these should include species of value to wildlife, such as varieties listed on the RHS 'Plants for Pollinators' database, providing a nectar source for bees and other pollinating insects.

### Habitat Enhancement

Where possible, the retained areas of undeveloped land will be subject to enhancement measures, to increase their value to wildlife. The management of these habitats will help to maintain and enhance their diversity in turn increasing their value for wildlife.

### Wildflower Grassland

Areas of wildflower grassland will be created within the site to be used as public open space. The areas could be provided both in the area of public open space and across the site.

### Wetland Features

Attenuation basins will be provided to as part of the Sustainable Urban Drainage System. These will incorporate wetland wildflower grassland and marginal planting to create a variety of habitats. Creation of a wetland habitat such as this will provide opportunities for a range of wildlife, especially foraging bats, while also helping to attenuate surface water run-off.



Wild flowers will be incorporated into the areas of public open space

## Hedgerows and boundary features

There will be a number of new hedgerows planted within the site and on its boundary which will comprise native species, providing structural diversity and facilitating species movements around the site.

## Bat Boxes

Bat boxes will be incorporated within the proposed development. The provision of bat boxes will provide new roosting opportunities for bats in the area, such as Soprano Pipistrelle, a national Priority Species. So as to maximise their potential use, the bat boxes should ideally be situated on suitable retained trees, erected as high up as possible and sited in sheltered wind-free areas that are exposed to the sun for part of the day, facing a south-east, south or south-westerly direction. In addition, where architectural design allows, a number of integrated bat boxes / roost features should be incorporated into a proportion of the new build. The precise number and locations of boxes / roost features should be determined by a competent ecologist, post-planning once the relevant final development design details have been approved.



Elements such as bat boxes could be provided

## Hedgehog Enhancements

Hedgehog nest domes will be incorporated within green space within the site, away from roads, in suitable locations. Further to this, it is recommended that gaps, approximately 13cm high x 13cm wide are incorporated within the base of boundary fences to allow continued movement by hedgehog throughout the site.

## Bird Boxes

A number of bird nesting boxes will be incorporated within the proposed development, thereby increasing nesting opportunities for birds at the site. Ideally, the bird boxes will have greater potential for use if sited on suitable, retained trees or integral to new buildings, situated as high up as possible. The precise number and locations of boxes should be determined by a competent ecologist, post-planning once the relevant final development design details have been approved.



Proposals will allow for foraging routes

## Habitat Piles

A proportion of any deadwood arising from vegetation clearance works should be retained within the site in a number of wood piles located within areas of new planting in order to provide potential habitat opportunities for reptiles, amphibians and invertebrate species, which in turn could provide a prey source for a range of other wildlife. In addition, the provision and management of new native landscape planting will likely provide additional opportunities for invertebrates at the site in the long term.



Habitat piles make great places for insects, amphibians, reptiles and hedgehogs.

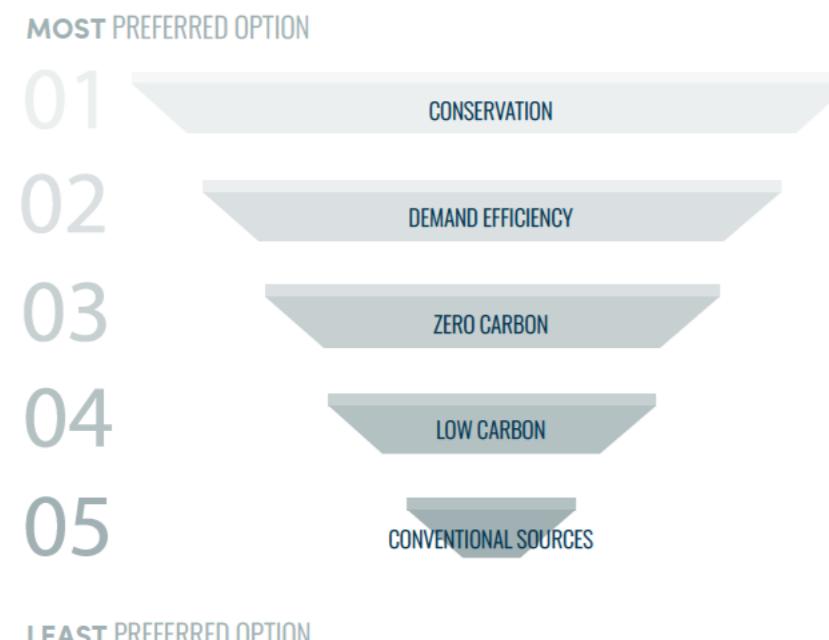
## D. Delivering a low carbon community

The proposals for the site aim to maximise the site's assets and layout in relation to sustainable design, creating an attractive, low carbon community.

### The Energy Hierarchy

The Energy Hierarchy underpins the entire approach to building performance for this development, thus prioritising a reduction in the demand for energy as far as possible through thermally efficient, easily controlled, well designed and oriented buildings.

The overall approach (shown below) is to conserve energy, minimise demand and then where required use renewable and environmentally friendly sources.



### Site Layout - Orientation, Passive Solar Design and Daylighting

The orientation of properties – along with the size and location of the properties' glazing and the extent of overshadowing – plays an important part in energy performance. Improving a building's orientation, so that the main living spaces can benefit from the heat and light of the Sun, can reduce the requirement to use fossil fuels to perform the same function. This reduces costs, energy use and associated carbon emissions. The proposed site layout has been developed with respect to identified topographical and visual constraints. Within these parameters, many of the properties benefit from a southerly orientation which also enhances the opportunities in relation to the use of solar technologies.

They will also benefit from the sun during the middle portion of the day without suffering from potential overheating later in the afternoon. This also helps to ensure that during the winter, when the Sun's path is shortened, the building still benefit as much as possible from winter sunlight. Furthermore, the low density of the development ensures appropriate spaces around dwellings, reducing the risk of overshadowing.

### Energy Efficient Buildings

The buildings will need to be energy efficient structurally. To facilitate this, not only will the individual elements (wall, roof, and floor) be thermally efficient, but the construction will need to ensure that thermal bridges are minimised through the application of Accredited Construction Details, insulated lintels and by ensuring air tightness.

### Lighting, Fixtures and Fittings

Further energy savings can be made by maximising the efficiency of appliances, lighting, fixtures and fittings. All electric lighting would be energy efficient, and any spot lighting (for example within kitchens and bathrooms) will be provided using dedicated LED fittings. In addition to the internal lighting, all street lighting and other street furniture will use LED technologies to further minimise lifetime energy use and associated emissions.

### Domestic Energy Supply Options

The scheme could use of air source heat pumps (ASHPs) for space and water heating in all properties on this development. This option aligns closely with the nationwide approach to the low carbon energy transition and the country's climate change targets: the rapid expansion in renewable and low carbon energy supply within the grid in recent years means that even direct electric heating now emits less carbon per kWh than natural gas.

By installing the heat pumps – a recognised low carbon technology – the project will minimise carbon emissions across new development by taking account of all levels of the energy hierarchy. The heat pump solution delivers against these requirements and also futureproofs the dwellings, enabling them to benefit from Grid decarbonisation over time, effectively resulting in fewer emissions year on year. At this stage therefore there are no plans to install further renewable energy generation technologies on site.

### Domestic Water Reduction Measures

In order to reduce domestic water use, the project could employ a combination of water efficient fixtures, appliances and fittings, with the addition of further water saving solutions such as rain and/or grey water recycling. Rain and/or grey water harvesting typically takes the form of a tank buried in the garden (in the case of houses) and within the curtilage of the property (in the case of flats). These are sized according to the property type and expected occupancy, with a secondary plumbing system to enable that water to be used for non-potable uses, such as the flushing of toilets, laundry, irrigation and car washing.

## Provision of Fibre-to-the-Premises

The availability of Fibre-to-the-Premises (FTTP) ensures that people remain connected and can access and participate in a range of services effectively. Moreover, it also facilitates greater home working which can help minimise the impact from personal transport. The dwellings will be provided with FTTP to enable access to broadband should residents wish to connect, and this will be explored further as the development process progresses.

## Flexible space

It is important for future homes to be designed with multiple uses in mind, such as carving out dedicated workspaces or gyms, or creating rooms that are reconfigurable depending on the time of day. This will in turn reduce the need to travel. The design of housing at the detailed design stage will need to take this into account and provide solutions which meet the changing needs of society and provide for more sustainable patterns of working and leisure.



Flexible internal spaces and provision of high speed broadband will allow for home working

## Promoting Sustainable Travel

The site is located within walking and cycling distance of a wide range of services and facilities, meaning that future residents will not be reliant on the private car to meet their daily needs.

Future residents of the proposed development will be encouraged to utilise sustainable travel modes with high quality pedestrian and cycle connections provided throughout the site and linking into the existing footway provision in and around Otterbourne. Moreover, information leaflets will be provided to the first purchasers of each property to highlight the accessibility and timetable of the bus stops in the local area.



The development has been designed to allow for new technology such as electric vehicle charging

## Carbon Capture

The proposed development will include a significant amount of green infrastructure, including large amounts of additional vegetation (notably, various species of trees). This provides carbon capture and storage, meaning that the carbon generated by the development will be captured before it escapes into the atmosphere.

## On-site food production

One of the potential uses of the proposed open spaces is for allotments and a community food production hub. The transportation of food over significant distances generates a substantial amount of carbon, therefore producing food on-site for the future residents of the proposed development (and, depending on the scale, potentially existing residents of Otterbourne as well) will contribute towards reducing food miles.



Inclusion of growing areas and community orchards could reduce the need for food to be transported to the village

## 04 Conclusion

**In conclusion, we believe that the site provides an excellent opportunity to deliver a range of benefits to the village. A sensitively designed scheme can provide:**

- **a mix of housing types (including bungalows), size and tenures;**
- **for safe and convenient pedestrian, cycle and vehicular access;**
- **an integrated development with enhanced, publicly accessible, landscape features;**
- **biodiversity enhancement through new habitat creation and targeted management; and**
- **a formal sustainable drainage system reduce the future flood risk downstream of the development.**

**Additionally, the site can bring forward a number of community infrastructure benefits for the village – space within the masterplan has been identified for opportunities to be incorporated. We have suggested a number of possibilities but these can be shaped by the community as to how best to meet its needs.**

**The site is deliverable in the short term and could make a valuable contribution in meeting the housing needs of local people and contribute to a range of improvements to local infrastructure and public open space.**



## Appendix 2 – Local Housing Needs Assessment for Otterbourne

# Land at Kiln Lane, Otterbourne

Local Housing Needs Assessment

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## Contents

## 1. Introduction

1.1 This Local Housing Needs (“LHN”) assessment has been prepared by Nexus Analytics and Research on behalf of St Philips Land, and in support of the promotion of Land at Kiln Lane, Otterbourne, Winchester (“the Site”).

1.2 Winchester City Council is currently in the process of producing a new Local Plan, in which a 55-dwelling site (Ref: OT03: Land East of Main Road) has been proposed for allocation in the settlement of Otterbourne. A windfall allowance of 20 dwellings has also been identified for Otterbourne providing for a combined housing provision of 75 dwellings. However, Otterbourne has not had any notable development for many years, and as such it is expected that the need for additional housing is likely more pronounced than the 55 dwellings allocated expressly allocated. The purpose of this assessment, therefore, is to identify the extent to which there is a specific localised need for additional housing in Otterbourne parish.

1.3 A toolkit produced by Locality, “Housing Needs Assessment at Neighbourhood Plan Level”<sup>1</sup>, provides guidance in relation to carrying out local housing needs assessments that are robust and objectively based. Our assessment is fully compliant with the methodology proposed in this toolkit.

1.4 This assessment follows the structure outlined below:

- Section 2 reviews policy and guidance, both at a national and local level, in relation to housing needs;
- Section 3 provides an overview of the key demographic traits in Otterbourne;
- Section 4 explores the condition of the existing local housing stock and market;
- Section 5 reviews historic housing delivery and future housing trajectory in Otterbourne; and
- Section 6 assesses the local housing needs of Otterbourne, in accordance with the Locality Toolkit.

## 2. Relevant Policy and Guidance

2.1 This section outlines the relevant policy and guidance, at both a national and local level, that have informed this assessment of Otterbourne's housing need.

### National Policy and Guidance

#### National Planning Policy Framework

2.2 The National Planning Policy Framework ("the NPPF") sets out the Government's planning policies for England and how they should be applied. It was most recently republished in December 2023.

2.3 Chapter 5 of the NPPF, "Delivering a sufficient supply of homes", outlines the Government's commitment to boosting supply the homes, and that authorities can meet as much of an area's identified housing need as possible.

2.4 In relation to identifying housing needs, Paragraph 61 states the following:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

2.5 Furthermore, Paragraph 67 outlines the following:

"Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations."

#### Planning Practice Guidance

2.6 The Government also publishes its Planning Practice Guidance ("PPG") which supports the NPPF. Its "Housing and economic needs assessment" guidance was most recently updated in December 2020.

2.7 The guidance outlines that assessments of local housing needs should begin with the calculation of the standard method, which uses a set formula to identify the minimum number of homes expected to be planned for. The guidance also notes that the standard method produced a minimum annual housing needs figure, not a housing requirement figure.

2.8 The guidance sets out the steps to calculating the standard method figure, which involves identifying household growth over the last 10-year period, an adjustment using median workplace-based affordability ratios, a cap on the level of increase, and an uplift for cities and urban centres.

### **Housing Needs Assessments at Neighbourhood Plan Level**

2.9 The Housing Needs Assessments at Neighbourhood Plan Level Toolkit (“the Toolkit”) was produced by Locality to inform the production of local housing needs assessments at a neighbourhood plan level.

2.10 The Toolkit sets out a four-step method to calculate the minimum housing need figure at a neighbourhood level. This assessment follows this approach in Section 6.

### **Draft National Planning Policy Framework**

2.11 The Government published a new draft National Planning Policy Framework in August 2024, which proposes revisions to the national planning policy.

2.12 A major change included in the draft NPPF is the proposal to change the calculation of the standard method. In order to support the Government’s ambition to deliver 1.5 million homes over the next five years, the new proposed standard method increases minimum housing figures over the existing standard method.

### **Local Policy and Guidance**

#### **Winchester District Local Plan Joint Core Strategy**

2.13 The Winchester District Local Plan Joint Core Strategy was produced by Winchester City Council and the South Downs National Park Authority and was adopted in March 2013. It sets out the spatial strategy and objectives of the District in the period to 2031.

2.14 Policy CP1 – Housing Provision sets out the quantum and location of new housing required over the Local Plan period:

“Provision will be made within the District for the provision of about 12,500 dwellings (net) in the period April 2011 to March 2031, distributed between the three spatial areas as follows:

- Winchester Town - 4,000 dwellings
- South Hampshire Urban Areas - 6,000 dwellings
- Market Towns and Rural Area - 2,500 dwellings

Approximately 8,000 of this total will be within major developments at North Winchester (2,000), West of Waterlooville (2,500) and North Whiteley (3,500).”

2.15 As outlined in Policy DS1 – Development Strategy and Principles, the vision for the Market Town and Rural Area is as follows:

“the Market Towns and Rural Area will make provision for about 2,500 new homes, and support economic and community development that serves local needs in the most accessible and sustainable locations, promotes the vitality and viability of communities, and maintains their rural character and individual settlement identity”

2.16 Within the Market Town and Rural Area, Policy MTRA 2 – Market Towns and Larger Villages allocates about 500 new homes in Bishops Waltham and New Alresford, and about 250 new homes in each of Colden Common, Denmead, Kings Worthy, Swanmore, Waltham Chase and Wickham.

2.17 Otterbourne is not explicitly allocated any housing growth under the Local Plan. However, Policy MTRA 3 – Other Settlements in the Market Towns and Rural Area does outline that development and redevelopment opportunities will be supported within the settlement boundary.

#### **Regulation 19 Local Plan**

2.18 The Winchester District Local Plan Regulation 19 went out for consultation in 2024. The emerging plan covers the period 2020-2040. The plan sets out the development strategy for the whole of Winchester District outside of the South Downs National Park, as the South Downs National Park Authority has responsibility for planning in that area.

2.19 The Plan divides the Plan area into three broad geographical areas: Winchester Town, South Hampshire Urban Areas and Market Towns and Rural Area. Otterbourne falls into the latter area. In relation to these areas, Strategic Policy SP2: Spatial Strategy and Development Principles outlines the following:

“The council will support the delivery of new housing, economic growth and diversification, as appropriate for each of the three spatial areas, through the following development strategy:

- i. Winchester Town will make provision for about 5,640 new homes through a range of accommodation, including the completion of the Kings Barton development and the redevelopment of Sir John Moore Barracks, to meet the needs of the whole community and to ensure that the local economy builds on its existing and growing strengths in higher education, creative and media industries, and other knowledge-based activities, whilst respecting the town’s special heritage and setting.
- ii. The South Hampshire Urban Areas will make provision for about 5,650 new homes and contribute towards meeting the Partnership for South Hampshire strategy of improving economic performance, primarily by providing major housing, economic growth and community and physical infrastructure in two sustainable new neighbourhoods at Newlands (West of Waterlooville) and North Whiteley (Whiteley). Strategic Policy SP2 Spatial Strategy and Development Principles.
- iii. The Market Towns and Rural Area will make provision for about 3,850 new homes and support economic and community development that serves local needs in the most accessible and sustainable locations (see the rural settlement hierarchy in Policy H3), which promote the vitality and viability of communities, and maintain their rural character and individual settlement identity.”

2.20 Within the Market Towns and Rural Area, the Plan defines Otterbourne as an Intermediate Rural Settlement, along with Hursley, South Wonston, Sutton Scotney and Waltham Chase. Collectively, these settlements are expected to provide approximately 360 dwellings across the Local Plan period.

2.21 As the Plan outlines, the minimum housing requirement for the District is set by the Government based on the Standard Method. The results of the Standard Method change annually, although as of March 2024 the Standard Method figure for Winchester District is 676 dwellings per annum. The Government expects the Standard Method figure to be used as a starting point when determining the District’s housing requirement, and that local authorities should also consider any ‘Duty to Cooperate’ requirements.

2.22 The table below illustrates how the Standard Method need over the Local Plan period has been calculated.

Figure 2.22.1 Extract of Table H1 from the Regulation 19 Local Plan

Years of Plan Period	Standard Method Need	x Number of Years
2020-2021	685	685 x 1 = 685
2021-2022	666	666 x 1 = 666
2022-2023	707	707 x 1 = 707
2023-2024	691	691 x 1 = 691
2024-2040	676	676 x 16 = 10,816
<b>Total</b>		<b>13,565</b>

Source: Regulation 19 Local Plan

2.23 Winchester District is also expected to contribute to the needs of neighbouring authorities under the Duty to Cooperate. The draft Plan has set an unmet needs allowance of an additional 1,900 dwellings.

2.24 Combining the Standard Method figure with the unmet needs allowance figure provides a total district housing requirement of 15,465 dwellings across the Local Plan period. The table below establishes how the Council intends to meet this requirement.

Figure 2.24.1 Extract of Table H2 from the Regulation 19 Local Plan

Winchester District Housing Need		Winchester District Housing Provision	
Standard Method need for Plan period 2020-2040	13,565	Completions since start of Local Plan period (2020-2023)	3,170
		Outstanding planning permissions	6,780
Unmet Needs Allowance (for unmet need in neighbouring authorities)	1,900	Other Commitments (previous Local Plans incl. SDNP)	745
		Windfall development	1,895
		Additional allocations made in this Local Plan	2,875
<b>Total District Housing Requirement</b>	<b>15,465</b>	<b>Total District Housing Provision</b>	<b>15,465</b>

Source: Regulation 19 Local Plan

2.25 The Plan identifies that Otterbourne has capacity for approximately 77 dwellings over the Plan period, which is achieved in the following way:

Figure 2.25.1 Otterbourne Housing Sources, 2020-2040

Otterbourne Housing Sources	No. of dwellings
Net completions in or adjoining settlement (2020-2023)	2
Outstanding permissions (at 2023)	0
Windfall allowance	20
New Site allocated in this Plan (Policy OT1)	55
<b>Total Provision 2020-2040</b>	<b>77</b>

Source: Regulation 19 Local Plan

2.26 The majority of housing in Otterbourne (55 dwellings) is expected to be achieved at Land East of Main Road, which is allocated under Policy OT1 of the Plan.

### **Winchester Strategic Housing Market Assessment**

- 2.27 The most recent full Strategic Housing Market Assessment ("SHMA") for Winchester District was published in February 2020.
- 2.28 The SHMA separates the District into three distinct market areas: Winchester Town, Northern Market Area and Southern Market Area. Otterbourne falls within the Northern Market Area.
- 2.29 In regards to housing need, the SHMA refers to a separate "Future Local Housing Need and Population Profile Assessment", produced in January 2020, which concludes that Winchester District has a local housing need at 2021 of 664 homes per annum, for an overall need of 13,280 homes across the period 2016-2036.
- 2.30 In terms of how the identified housing need should be distributed, the SHMA does not make any particular recommendations.

### **Winchester District Local Plan 2040 Housing Topic Paper**

- 2.31 This Topic Paper was published in July 2024, and was prepared to response to key issues raised during the Regulation 18 Local Plan consultation. It relates primarily to the Local Plan housing requirement and the key components of housing supply.
- 2.32 In terms of calculating housing requirements, the Topic Paper recommends that the Regulation 19 plan is updated to reflect the latest Standard Method figure available at the time of publication, which is 676 dwellings per annum.
- 2.33 The Topic Paper also discusses the Duty to Cooperate and outlines where Winchester may be able to assist neighbouring authorities in meeting their housing targets.
- 2.34 Portsmouth is expected to have a shortfall of approximately 3,600 dwellings and has therefore requested that Winchester "earmarks a meaningful portion of its housing buffer towards meeting unmet need of the City of Portsmouth, which should be located within a sustainable travel to work area from Portsmouth".
- 2.35 Similarly, Havant Borough Council do not expect to meet their own housing requirements and have therefore formally requested assistance from Winchester City Council in housing delivery, and they also question whether the buffer of 1,450 dwellings from the Regulation 18 plan could be higher.
- 2.36 The Topic Paper concludes that the Regulation 19 plan should include an unmet needs allowance of 1,900 dwellings, which is higher than the 1,450 dwellings originally planned for in the Regulation 18 plan.

### **Partnership for South Hampshire Spatial Position Statement**

- 2.37 This statement was published in December 2023 and was prepared collaboratively by the authorities which make up the Partnership for South Hampshire ("PfSH").
- 2.38 In terms of housing delivery, the statement establishes that there is likely to be a shortfall of housing delivery across the ten authorities of 11,771. The statement reinforces the requirement for the PfSH authorities to collaborate in order to deliver a sufficient supply of housing to meet their collective targets.

### 3. Demographic Analysis

3.1 This section explores the main demographic traits of Otterbourne's population.

3.2 Unless stated otherwise, references to Otterbourne throughout this assessment relate to Otterbourne Parish, and comparisons will also be made throughout to Winchester District and the South East region.

#### Population

3.3 The table below details the population of Otterbourne, Winchester, the South East and England according to the 2011 and 2021 censuses.

Figure 3.3.1 Population change, 2011 to 2021

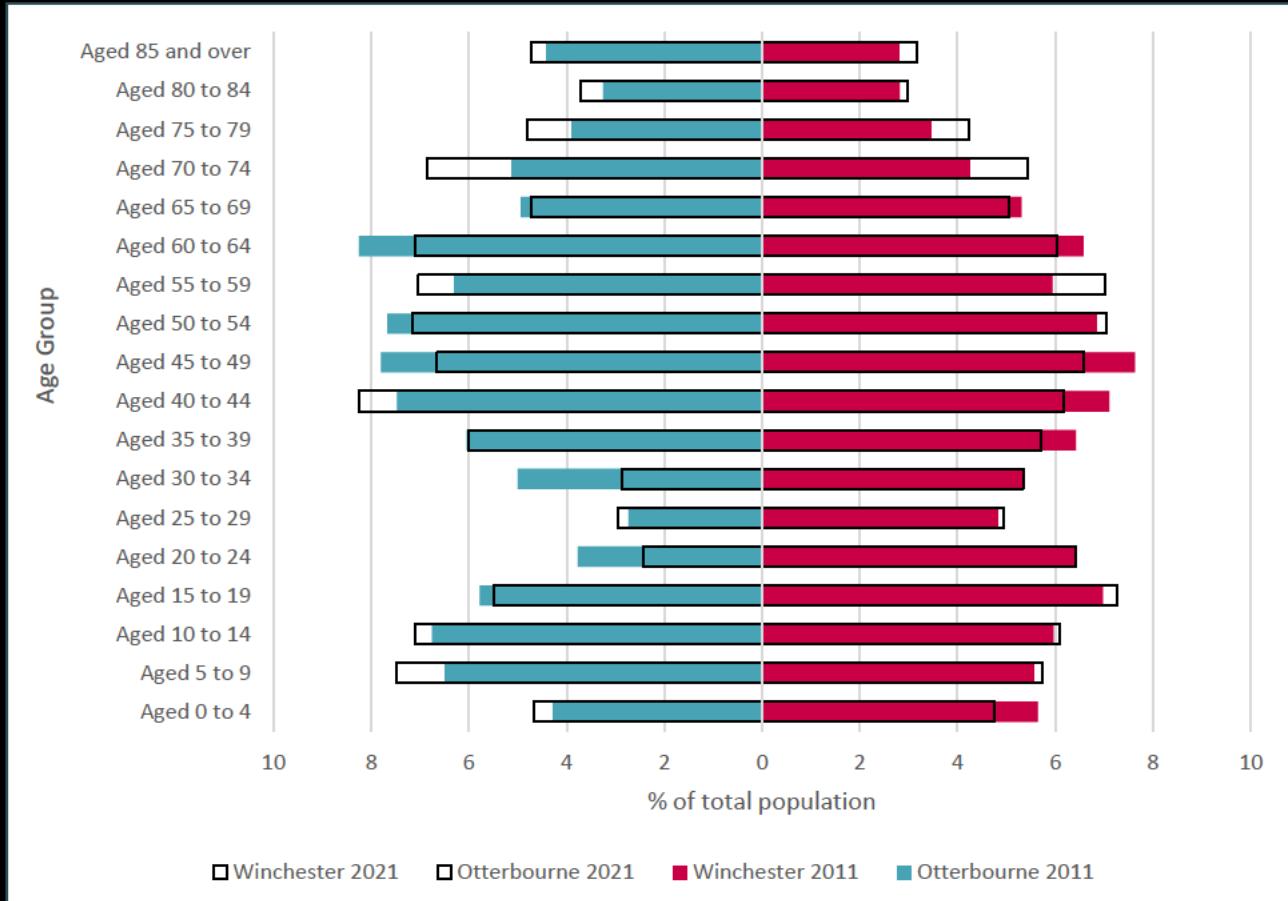
	2011	2021	Actual Change	% change
Otterbourne	1,539	1,564	25	1.6%
Winchester	116,595	127,444	10,849	9.3%
South East	8,634,750	9,278,065	643,315	7.5%
England	53,012,456	56,490,048	3,477,592	6.6%

Source: ONS

3.4 As seen, population growth in Otterbourne has been minimal, with an increase of only 1.6% between 2011 and 2021. Conversely, the population of Winchester has increased by 9.3%, which is above regional and national average growth rates.

3.5 The figure below illustrates the age structure of Otterbourne and Winchester at both 2011 and 2021.

Figure 3.5.1 Age structure of Otterbourne and Winchester, 2011 and 2021



Source: ONS

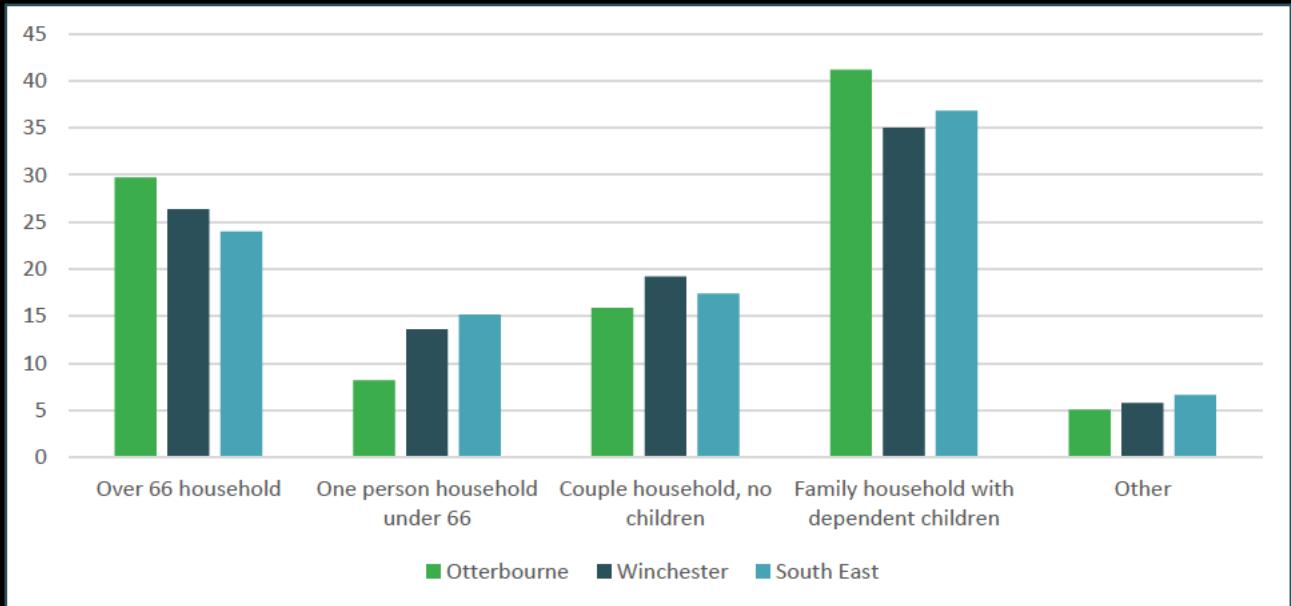
3.6 As seen, Otterbourne has an older population than the district as a whole, with a greater proportion of people aged 60 and over. Since 2011, the proportion of those aged 70 and older has increased, although the population of those aged 15 and under has also increased. The young adult age group, however, appears to have decreased.

## Households

3.7 According to Census data, as of 2021 Otterbourne parish had a total population of 1,564 persons, living in 612 households. This equates to an average household size of 2.56 persons per household, which is higher than the district average of 2.46, and the national average of 2.41.

3.8 The figure below illustrates the composition of households in Otterbourne, Winchester and the South East. Otterbourne has an above average proportion of households which are aged 66 and over (29.7%), which aligns with the age structure of the parish. There are fewer single person households under 66 (8.2%), but more family households with dependent children (41.2%) when compared to district and regional averages.

Figure 3.8.1 Household composition



Source: Census 2021

## Summary

3.9 A review of the demographics in Otterbourne has highlighted the below:

- Otterbourne has a small population which has seen minimal growth since 2011;
- Otterbourne has an older population than average, which has aged since 2011;
- Otterbourne has a large average household size; and
- There are a high proportion of family households and over 66 households.

## 4. Local Housing Stock and Market

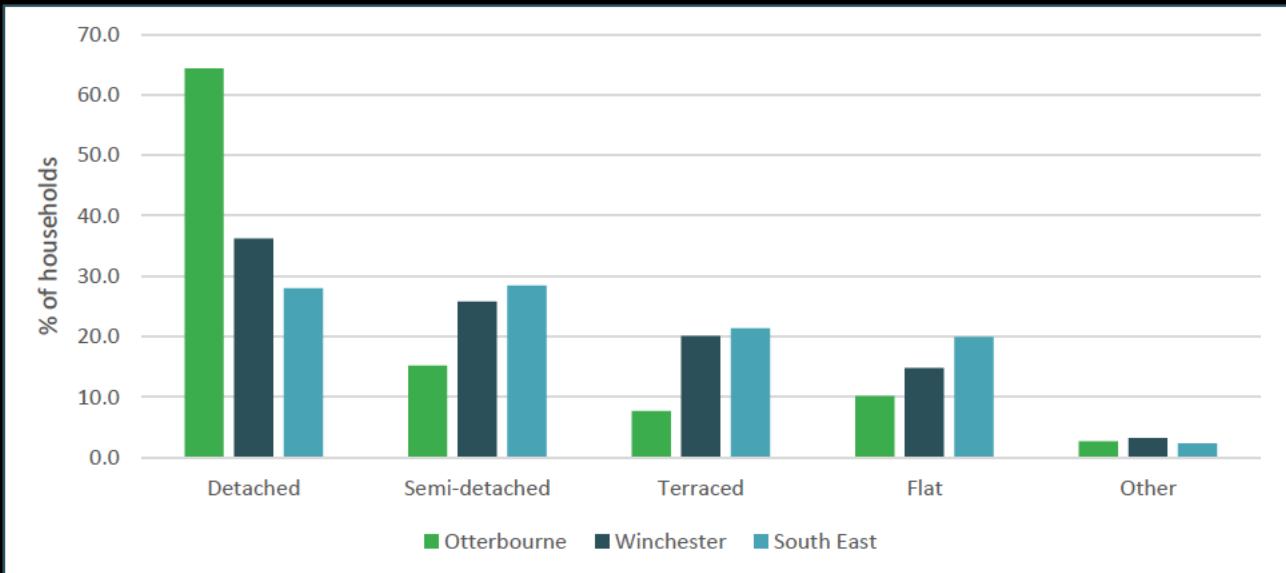
4.1 The following section explores the characteristics of the local housing stock in Otterbourne, and looks to the current housing market in the area.

### Housing Stock

#### Accommodation Type

4.2 The figure below illustrates housing stock by accommodation type in Otterbourne, Winchester and the South East according to the Census 2021. As seen, the predominant accommodation type in Otterbourne is by far detached housing at 64.4%, which is more than double the regional average. Conversely, the proportion of households living in semi-detached houses, terraced houses and flats is well below district and regional averages.

Figure 4.2.1 Accommodation type

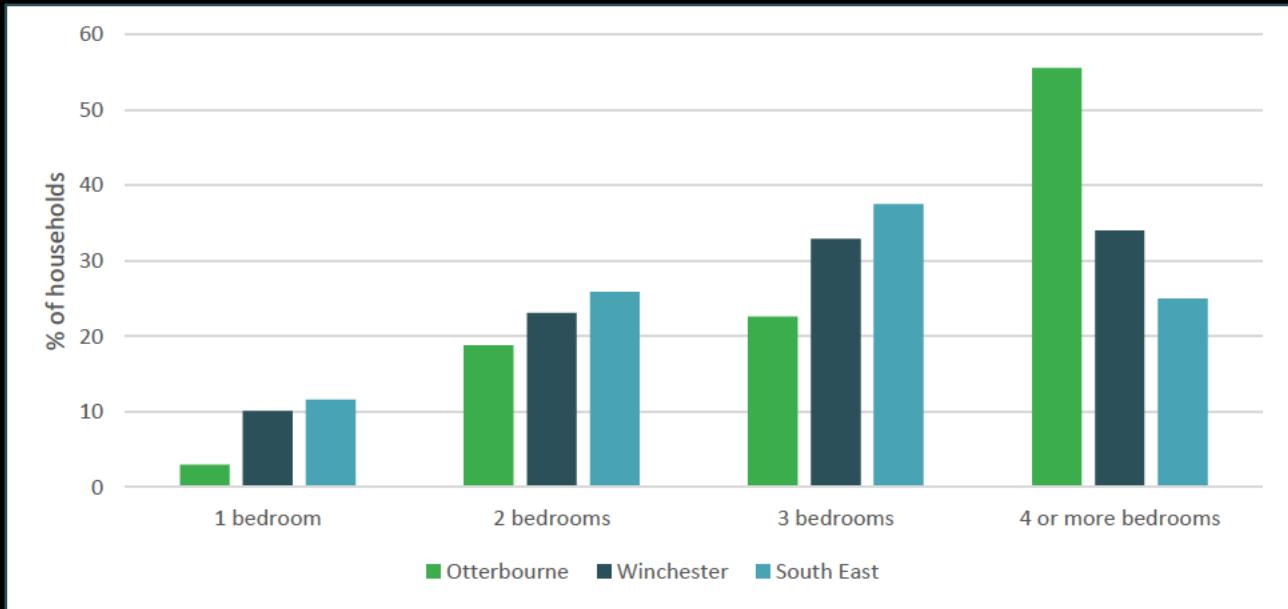


Source: Census 2021

#### Dwelling Size

4.3 The figure below displays the number of bedrooms per household. The majority (55.5%) of households in Otterbourne live in dwellings with four or more bedrooms, which is well above district and regional averages. Conversely, there are fewer households living in dwellings with one, two or three bedrooms, which suggests the average dwelling size in Otterbourne is considerably larger than average. This also coincides with the predominant accommodation type, as detached properties tend to have more bedrooms.

Figure 4.3.1 Number of bedrooms

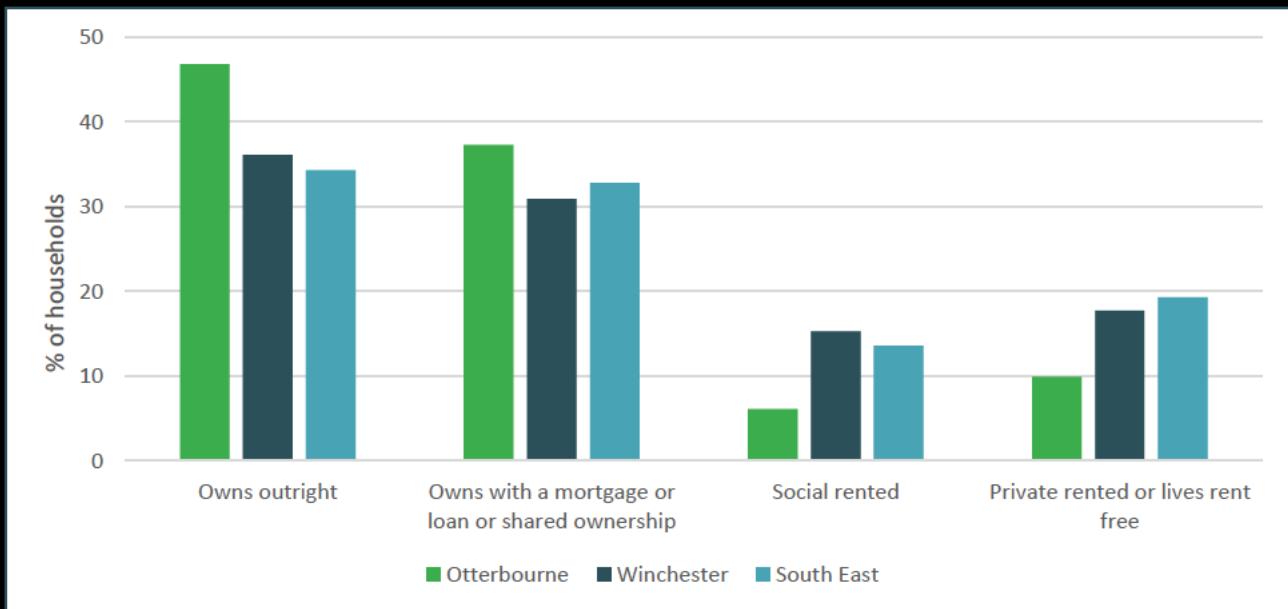


Source: Census 2021

#### Household Tenure

**4.4** Household tenure for the three assessment areas can be seen in the figure below. At 84.1%, Otterbourne has a very high home ownership rate; home ownership is at 67.0% in Winchester and 67.1% in the South East. Otterbourne has a particularly low proportion of households living in social rented accommodation when compared to district and regional averages.

Figure 4.4.1 Household tenure



Source: Census 2021

## Housing Market

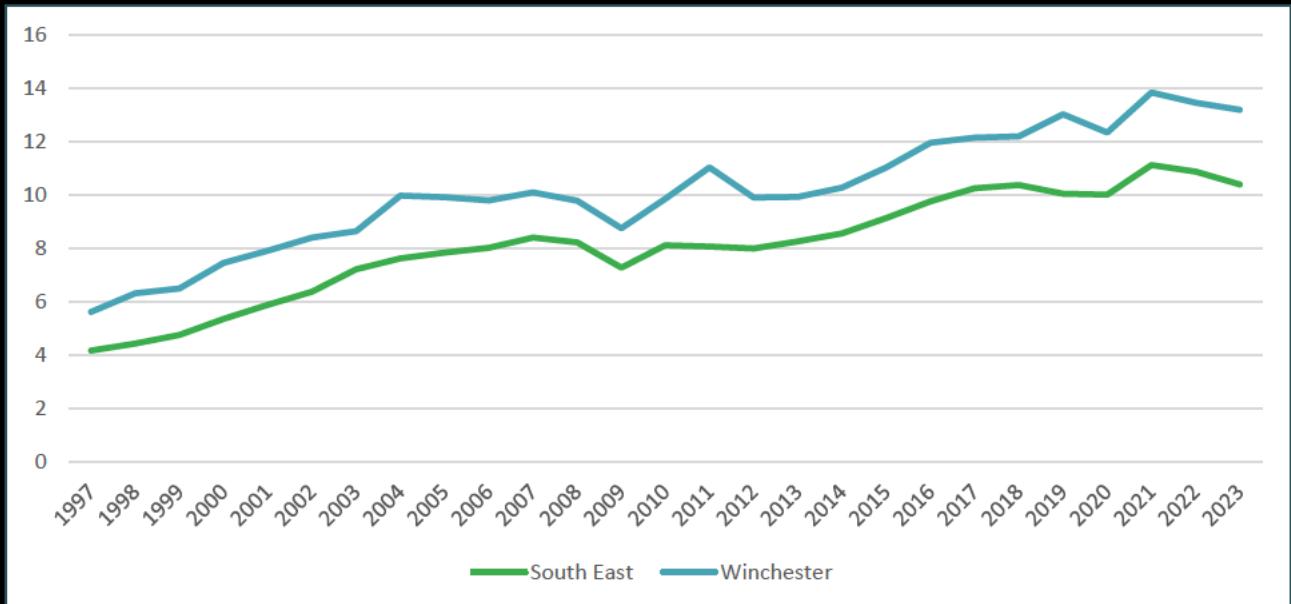
4.5 Median house price data is available at Middle Layer Super Output Area (MSOA) level. The figure below illustrates how median house prices in Otterbourne (Winchester 009 and Winchester 010), Winchester District and the South East region have changed over the period 1996 to 2022. The increase in house prices has been more dramatic in Otterbourne and Winchester than the wider South East region. As of 2022, the median house price in Otterbourne was £595,000 and £545,000, which is higher than the district average of £485,625 and considerably higher than the regional average of £380,000.

Figure 4.5.1 Median house prices



4.6 Affordability data is available at local authority level and above. The figure below displays the median house price to median workplace-based income ratios in Winchester and the South East. As of 2023, Winchester had an affordability ratio of 13.19, meaning residents must pay an average of 13 times their annual income for a house. This is considerably higher than the regional ratio of 10.39. Although fluctuating, both areas have seen a significant worsening of affordability since 1997.

Figure 4.6.1 Housing affordability ratios



Source: ONS

## Summary

4.7 The main findings following a review of the local housing stock and market are as follows:

- Dwellings in Otterbourne are larger than average, with a high proportion of households living in detached houses and dwellings with four or more bedrooms;
- Home ownership is very high in Otterbourne, and conversely there are relatively few households living in socially rented properties; and
- Housing affordability in Winchester is fairly low when compared to regional averages, and when considering median house prices and housing affordability ratios, and there is evidence to suggest that housing affordability is an even more pronounced issue in Otterbourne specifically.

## 5. Housing Delivery and Trajectory

5.1 This section reviews Winchester City Council's annual Authority Monitoring Reports ("AMRs") dating back to 2008 to understand historic and future housing delivery within Otterbourne.

### Housing Delivery

5.2 According to the 2022-2023 AMR, there were 1,044 total housing completions in Winchester District. Although there have been fluctuations, annual housing completions have generally increased in Winchester since 2014. Housing delivery in the district typically outstrips that of county and national trends.

5.3 In the MTRA there were a total of 285 dwelling completions. However, the majority of these were completed in the Market Towns and Larger Villages. Only 18 completions were identified in Other Settlements in the Market Towns and Rural Area.

5.4 The AMRs going back to 2008-09 identify housing completions and losses in each parish of the district. The table below sets out these for Otterbourne parish.

Figure 5.4.1 Otterbourne housing delivery 2008-2023

Year	Application Number	Completions	Losses	Net Gains
2022-23	None identified.	-	-	-
2021-22	19/01222/FUL	4	-	4
2020-21	17/00163/FUL	-	-1	-3
	18/00023/FUL	-	0	
	19/01380/FUL	-	-1	
	19/01222/FUL	-	-1	
2019-20	None identified.	-	-	-
2018-19	None identified.	-	-	-
2017-18	None identified.	-	-	-
2016-17	None identified.	-	-	-
2015-16	None identified.	-	-	-
2014-15	Application number not provided.	4	-	4
2013-14	Application number not provided.		-1	-1
2012-13	None identified.	-	-	-
2011-12	Application number not provided.	4	-	4
2010-11	None identified.	-	-	-
2009-10	Application number not provided.	1	-	1
2008-09	Application number not provided.	3	-	3
<b>Total</b>		<b>16</b>	<b>-4</b>	<b>12</b>

Source: Winchester City Council AMRs

5.5 As seen, housing delivery in Otterbourne over the last 16-year period has been very minimal. There have been 16 completions and four losses, for a total net gain of 12 dwellings in the parish. These have all been developed through windfall sites.

## Housing Trajectory

5.6 In terms of future housing delivery, the 2022-23 AMR sets out that across the district, there are projected to be 6,718 housing completions over the period 2023-24 to 2030-31. The majority of these (4,072 units) are projected to be delivered via strategic allocations.

5.7 No outstanding commitments have been identified within Otterbourne parish.

## Summary

5.8 The main highlights of housing delivery and trajectory in Winchester are summarised below:

- Although housing delivery has been high in Winchester District in recent years, housing delivery in Otterbourne specifically has been low, with only a net gain of 12 dwellings in the parish in the last 16-year period;
- Housing delivery in Otterbourne has been developed through a windfall allowance rather than allocated sites; and
- There are no outstanding commitments for housing delivery in Otterbourne.

## 6. Assessment of Local Housing Needs

6.1 Following a review of the local housing market in Otterbourne, we are now able to calculate the local housing needs of the area. We follow the four-step approach recommended in the Locality Toolkit.

### Locality Toolkit Assessment

#### Step 1: Determine your share of the Local Plan Requirement, based on the population of the neighbourhood area

6.2 The housing requirement for Winchester is used as the starting point for our assessment.

6.3 The Locality Toolkit outlines that housing targets should be identified from the most recent Local Plan. However, as we are focused on the emerging Plan, we therefore use the housing target outlined in the Regulation 19 Local Plan.

6.4 The current standard method figure for Winchester is 676 dwellings per year. This figure is based on population growth from the previous ten-year period, as outlined in the 2014 sub-national population projections, and the 2023 affordability ratio for the District.

6.5 The baseline figure for Otterbourne itself is then taken to be its 'share' of the current Winchester housing target based on its population. At the 2021 Census, Winchester had a population of 127,400 people and Otterbourne had a population of 1,600, which represents 1.3% of the total district's population. Applying this proportion to the overall housing need figure gives us an annual requirement for Otterbourne of 8 dwellings per annum. Over the 20-year plan period, this equates to 170 dwellings.

#### Step 2: Review the most recently available local authority planning strategy

6.6 The next step is to review the distribution of housing as outlined in the emerging Plan.

6.7 As discussed previously, along with four other settlements, the emerging Plan defines Otterbourne as an Intermediate Rural Settlement. These settlements have an overall housing target of 360 dwellings. However, the Plan does not detail how this target of 360 dwellings should be divided between the five settlements (albeit, specific allocations are made by settlement in the emerging Plan. We therefore look to the current populations of the five settlements to judge what level of housing would be appropriate at each settlement.

6.8 The table below details the current population at each settlement, and what proportion this represents of the combined population. The overall housing target is then apportioned to each settlement. Note that the populations below are presented for the built-up areas (as defined by the ONS), rather than parishes.

Figure 6.8.1 Distribution of Dwellings

Settlements	Population (Census 2021)	Population as %	Distribution of Dwellings
<b>Total</b>	<b>8,230</b>	<b>100.0%</b>	<b>360</b>
Otterbourne	1,300	15.8%	57
Hursley	480	5.8%	21
South Wonston	2,700	32.8%	118
Sutton Scotney	950	11.5%	42
Waltham Chase	2,800	34.0%	122

Source: ONS

6.9 Otterbourne contains 15.8% of the combined population of the Intermediate Rural Settlements. Applying this proportion to the 360 proposed dwellings gives a figure of 57 dwellings.

6.10 This figure is not the recommended housing target for Otterbourne, but allows us to understand how Otterbourne sits within the wider planning strategy for Winchester District.

6.11 57 dwellings represents only 0.4% of the total target of 15,115 dwellings for the district as a whole. We then apply 0.4% to the standard method figure of 676, which provides an annual (rounded) target of 3 dwellings for Otterbourne. Over the twenty-year plan period, this equates to 60 dwellings, which is considerably below the baseline figure of 170 dwellings calculated at Step 1.

6.12 This would suggest that the emerging Plan places a lesser emphasis on Otterbourne as a location for future development.

#### Step 3: Review dwelling commitments and completions

6.13 Dwelling completions since 2020 must then be accounted for to arrive at a final housing need figure.

6.14 A review of the Council's AMRs shows that since 2020, there have been four housing completions and three housing losses since 2020, for a total net gain of only one dwelling. No outstanding commitments have been identified that would have to be accounted for.

6.15 This housing completion is then deducted from our calculation of housing needs in Otterbourne, which results in a residual housing need of 59 dwellings over the Plan period.

#### Step 4: Local authority and the final housing need figure

6.16 The results of Steps 1-3 are summarised in the table below. As seen, Otterbourne has an overall housing need of 60 dwellings, and a residual need of 59 dwellings after accounting for dwelling completions. This equates to 3 dwellings per year.

Figure 6.16.1 Housing need in Otterbourne

	Overall	Residual
Plan period figure	60	59
Annual figure	3	3

Source: Nexus analysis

6.17 The emerging Plan provides for some 77 dwellings in Otterbourne over the Plan period, an addition of 75 dwellings accounting for completions from the period 2020 to 2023. However, whilst this figure is slightly above the 59 dwellings that result from the population calculations, it should be noted that only 55 dwellings of the 75 dwellings are expressly identified in the form of an allocation. The remaining 20 dwellings are in the form of windfall allowance. Therefore, whilst the total 77 dwellings suggests that Otterbourne has been assigned a level of housing above what is required, the identified/confirmed provision from the emerging Plan is only 57 dwellings, less than what is required.

6.18 However, it should be stressed that the objective of the four-step method above is to meet a *minimum* housing need figure, and that housing requirements in practice are likely to be higher. It also assumes that the distribution and apportionment of housing set out in the emerging Local Plan is appropriate; we would contest this, and in the following sections we outline why the housing needs identified for Otterbourne using the Toolkit do not accurately reflect

housing needs - the housing requirement should be set higher - nor the wider implications of providing a windfall allowance rather than additional identified housing in the emerging plan.

### Intermediate Rural Settlement group to be allocated greater housing

6.19 We consider whether there is scope for the Intermediate Rural Settlement group as a whole to be assigned a greater level of housing delivery. The Regulation 19 draft Local Plan, and its accompanying supporting documents, do not clearly set out how the apportionment of development was considered and how the figure of 50 to 60 dwellings for each settlement in the Intermediate Rural Settlement group was identified. As is set out below, this does not appear to have happened on the basis of the scale of the population for the existing settlement. Combined, the villages in the Intermediate Rural Settlements total 8,230 persons, which represents 6.5% of Winchester District's population. 6.5% of the annual housing requirement in Winchester would be 44 dwellings per annum, or 873 across the Plan period. Evidently, this is more than double the quantum of housing which has been allocated to this group, which suggests it is reasonable for more significant housing delivery to be allocated to these settlements which reflects the size of their populations.

6.20 Additionally, it has been shown that historic housing delivery in the other four settlements, although higher than in Otterbourne, has been low. Across the five settlements, only 238 dwellings have been built out, approximately half of which are located in South Wonston.

6.21 The full details of historic housing delivery in the Intermediate Rural Settlements are set out in Appendix 1, and a summarised table can be seen below.

Figure 6.21.1 Historic housing delivery in the Intermediate Rural Settlements

Settlement	Net Gain
Otterbourne	12
Hursley	22
South Wonston	125
Sutton Scotney	31
Waltham Chase	48
<b>Total</b>	<b>238</b>

Source: Winchester City Council AMRs

6.22 The Regulation 19 draft Local Plan states at paragraph 9.28 that "...intermediate rural settlements have modest housing provision, as they do not benefit from significant commitments or completions." That is certainly the case for Otterbourne that recent housing delivery has been limited, but this should not be the reason why future development is limited and, it could be argued that this is actually a reason why greater development is now needed in the Intermediate Rural Settlements.

### Housing Unaffordability

6.23 As has previously been established in Section 4, Otterbourne experiences issues with housing affordability.

6.24 Although housing affordability is poor throughout Winchester District, house prices appear to be particularly high in Otterbourne. One reason for this unaffordability may be that there is currently a shortage of housing in the area, due to a lack of new housing supply being delivered, which pushes up house prices. In addition, the housing that has been delivered, coming forward in developments of 1 and 2 net additional units, would not have produced any affordable housing for the parish.

6.25 If additional housing provision is delivered at Otterbourne, we would expect this would lessen pressures on the current housing market in Otterbourne and that, as a result, housing is made more affordable for local residents.

### New Standard Method

6.26 It is recognised that if the Standard Method is to be revised, as proposed under the draft NPPF consultation (July 2024), this would alter the overall minimum housing figure for the District, and also the minimum figure for Otterbourne.

6.27 Under the new proposed Standard Method figure, the minimum figure for Winchester would be 1,099 dwellings per annum, a significant increase of 63% over the current figure of 676 dwellings per annum.

6.28 By following the Locality toolkit methodology, but using the total figure of 1,099 dwellings rather than 676 dwellings, this provides Otterbourne with a baseline annual figure of 14 dwellings, or 276 dwellings across the Plan period.

6.29 Adjusted to reflect Winchester's spatial strategy, this results in an annual requirement of 4 dwellings, or 80 dwellings across the Plan period.

6.30 After accounting for completions since 2020, this results in a total minimum housing need for Otterbourne of 79 dwellings over the Plan period. This is 34% higher than the figure calculated through the current Standard Method.

## 7. Summary and Conclusions

7.1 This LHN assessment has been prepared to identify the extent to which there is a localised need for additional housing in Otterbourne parish.

7.2 The minimum housing need for Otterbourne can be calculated by apportioning the District's total housing need calculated through the Standard Method. This results in a figure of 59 dwellings across the Local Plan period.

7.3 However, in recognition that this is a minimum housing need, and is reflective of a housing distribution which we do not consider is appropriate to reflect the needs of the smaller settlements in the District, we consider that there is significant scope for the housing requirement to more accurately reflect housing needs in Otterbourne, and that the actual figure should be considerably higher. This is on the basis of the following:

- That housing growth in the district as a whole has been apportioned inaccurately in the Regulation 19 Local Plan, and that a greater level of housing growth should be allocated to the Intermediate Rural Settlement group, as part of a greater level of housing overall for the local authority as a whole;
- That Otterbourne faces particular issues of housing affordability, and that by expanding the housing stock in the village, the housing market will be under less pressure and housing prices will decrease, making them more affordable for local residents; and
- Finally, that the baseline Standard Method figure will face a significant uplift if the proposed changes to the Standard Method calculations, as outlined in the draft NPPF are approved.

## Appendix 1 – Historic Housing Delivery in Intermediate Rural Settlements

Year	Application Number	Net Gains
<b>Hursley</b>		
2022-23	None Provided	-
	20/02150/FUL	1
	19/00519/FUL	1
	18/00916/FUL	1
2021-22	20/01014/FUL	1
	21/00398/FUL	1
	21/01374/FUL	1
	20/01247/FUL	1
2020-21	17/01083/PNACOU	1
2019-20	None identified.	-
2018-19	None identified.	-
2017-18	12/01833/FUL	1
2016-17	None identified.	-
2015-16	None identified.	-
2014-15	None identified.	-
2013-14		2
2012-13	None identified.	4
2011-12	None identified.	5
2010-11	None identified.	1
2009-10	None identified.	1
2008-09	None identified.	0
<b>Total</b>		<b>22</b>
<b>South Wonston</b>		
2022-23	18/02875/FUL	1
2021-22	17/02408/FUL	2
	09/00745/FUL	1
2020-21	17/01405/FUL	1
2019-20	15/01895/FUL	4
	16/01474/FUL	3
	15/02751/REM*	24
2018-19	16/00611/FUL	2
	11/03035/FUL	1
2017-18	15/02751/REM*	36
	13/02892/FUL	1
2016-17	Application number not provided.	-1
2015-16	Application number not provided.	1

2014-15	Application number not provided.	1
2013-14	Application number not provided.	4
2012-13	Application number not provided.	1
2011-12	Application number not provided.	3
2010-11	Application number not provided.	26
2009-10	Application number not provided.	13
2008-09	Application number not provided.	1
<b>Total</b>		<b>125*</b>
<b>Sutton Scotney</b>		
2022-23	None identified.	-
2021-22	None identified.	-
2020-21	None identified.	-
2019-20	None identified.	-
2018-19	None identified.	-
2017-18	None identified.	-
2016-17	Application number not provided.	1
2015-16	Application number not provided.	1
2014-15	Application number not provided.	16
2013-14	Application number not provided.	2
2012-13	Application number not provided.	2
2011-12	Application number not provided.	2
2010-11	Application number not provided.	2
2009-10	Application number not provided.	5
2008-09	None identified.	-
<b>Total</b>		<b>31</b>
<b>Waltham Chase</b>		
2022-23	21/00696/FUL	2
	19/02151/FUL	1
	21/00065/FUL	1
	21/02858/FUL	3
2021-22	20/00902/FUL	3
2020-21	None identified.	-
2019-20	None identified.	-
2018-19	None identified.	-
2017-18	None identified.	-
2016-17	Application number not provided.	1
2015-16	Application number not provided.	1
2014-15	None identified.	-
2013-14	None identified.	-
2012-13	Application number not provided.	4
2011-12	Application number not provided.	11
2010-11	Application number not provided.	8

2009-10	Application number not provided.	4
2008-09	Application number not provided.	9
<b>Total</b>		<b>48</b>

\*Dwellings permitted under Planning Application 15/02751/REM are reserved for Service families off Connaught Road in association with the Worthy Down Camp Redevelopment Scheme.

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## Appendix 3 – Inspector's Post-Hearing Note to the North Norfolk Local Plan Examination

# North Norfolk Local Plan Examination

Assistant Director – Planning  
North Norfolk District Council  
Holt Road  
Cromer  
NR27 9EN

24 May 2024<sup>1</sup>

## NORTH NORFOLK LOCAL PLAN EXAMINATION

1. Following the three weeks of hearings held between January and March, I am now able to advise as to the main soundness issues raised by the plan and to seek the views of the Council as to how they might be addressed. Firstly however can I thank the Council for the arrangements which enabled the hearings to run smoothly and effectively, particularly to Mark Ashwell, the other officers and consultants who explained the plan, to Annette Feeney for all her work behind the scenes as programme officer and to Erika Temple & Charlotte Sandon for their invaluable assistance on sitting days. Can I also thank all the other participants who contributed to the discussions to enable a full and rounded debate to take place.
2. I am also grateful for the work carried out since the hearings to update and clarify various matters, particularly for the latest standard method calculation dated 26 April 2024 (document EH009(a)(i)) and the housing trajectory dated 2 May 2024 (EH013(l)) which sets out the Council's latest position regarding housing provision. These form key inputs to this letter.
3. Having taken full account of all the background evidence and representations submitted to date together with the hearing discussions, the main concerns relating to soundness that are relevant at this stage are set out in this letter. In addition, there are a number of other soundness issues but these could be corrected relatively simply in due course by modifications to the plan and will be the subject of a further letter.
4. This letter deals in turn with the plan period, local housing need and the housing requirement, the housing provision being made in the plan and its timing, employment provision and finally the policy for gypsy, traveller and travelling showpeople's accommodation, before bringing together the implications of these findings for the next stages of the examination.

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<sup>1</sup> Not released until 19 July 2024 due to the general election.

## **Duty to Co-operate and Legal Requirements**

5. I am satisfied that the Council has met the duty to co-operate and other legal requirements relating to plan preparation.

## **Plan Period**

6. No doubt due to its lengthy preparation process, the submitted plan covers a twenty-year period from 2016 to 2036. At present, there are only 12 years of the plan period remaining, and once the further steps necessary to ensure a sound plan have been taken, it is likely to be nearer to 11 years. The National Planning Policy Framework (NPPF) states in paragraph 22<sup>2</sup> that strategic policies should look ahead a minimum 15 years from adoption, and to be consistent with this the plan period should be extended to 31 March 2040 to allow for adoption during the next 12 months. Turning to the base date of the plan, this should correspond to the date from which the housing needs of the district are quantified. As set out in paragraph 12 below, this should be April 2024. The plan period should therefore be 2024-40. The latest housing monitoring data for permissions and projected completions reflect the position at 1 April 2023 but these are sufficiently up to date for local plan preparation purposes.

## **Local Housing Need**

7. The NPPF states in paragraph 61 that the minimum number of homes needed in the district should be determined by using the standard method set out in Planning Practice Guidance (PPG) unless exceptional circumstances justify an alternative approach. The standard method takes the 2014 based household projections as the demographic starting point to which an affordability uplift is applied and the figure potentially capped to limit any increase. However, the Council have used the lower 2016 based household projections for this exercise, which after the uplift and a 5% adjustment leads to a local housing need of 480 dwellings per annum (dpa) over the plan period 2016-2036, a total of 9,600 dwellings. The Council argues that there were significant errors in the 2014 based projections for the district that were corrected in the 2016 based projections. The latter are therefore more robust and should be used for the housing need calculation.
8. However, using the 2016 or more up to date 2018 based projection would be in direct conflict with national policy. PPG states that the 2014 projections should be used to provide stability, to ensure historic under-delivery and declining affordability are addressed, and to boost significantly the supply of homes. Where an alternative approach results in a lower housing need figure, as here, there need to be exceptional *local* circumstances that justify departing from the standard method. The PPG is also clear that whilst any alternative approach should be based on realistic assumptions, more recent

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<sup>2</sup> Throughout this letter, NPPF paragraph numbers relate to the September 2023 NPPF which is the relevant version for the purposes of this examination.

household projections are not appropriate for use in what would otherwise be the standard method<sup>3</sup>.

9. The Council's objection to the 2014 based household projections is that for North Norfolk they project forward a significantly higher rate of growth than was subsequently shown to have actually happened. The projections are derived from the mid-year population estimates which suggested an increase in population of 6,000 people between 2001-11. However, the 2011 census showed the increase was actually only 3,200 people. The 'unattributable population change' (UPC) of minus 2,800 people was almost certainly due to net in-migration being over-estimated, figures for births and deaths being broadly accurate. The 2014 based projections build in this over-estimate, taking no account of UPC, whereas the error was corrected in the 2016 based estimates resulting in a significantly lower projection for the district.
10. The existence of a UPC factor in the case of the North Norfolk projection is not disputed, the issue is whether this constitutes exceptional circumstances that justify a departure from the standard method which in any event is only intended to identify a minimum figure. All local authorities were affected by UPC to some extent, and 25 outside London were subject to a higher over-estimate of population growth than North Norfolk in percentage terms. Whilst UPC discrepancies have been taken into account in a small number of planning appeals when determining housing land supply, including in North Norfolk, no examples have been provided of this issue being put forward by Councils or accepted by Inspectors when examining development plans. National policy could have been updated to adopt the 2016 or 2018 based household projections for use in the standard method but instead PPG specifically precludes their use as set out above. The issue was the subject of a technical consultation when it was decided that later projections could not be used to justify lower housing need<sup>4</sup>. Despite the Council's concerns about their accuracy, however valid, the 2014 based projections are to be used to support the objective of boosting housing supply.
11. In conclusion, the UPC discrepancy does not amount to an exceptional local circumstance that justifies a departure from the standard method in North Norfolk. The discrepancy is not such an extreme outlier nor a specific local factor, and although use of the standard method leads to a significantly higher local housing need figure, this reflects national policy. Furthermore, there is no obvious reason why housing provision in the district should be unnecessarily restricted.

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<sup>3</sup> PPG paragraphs 2a-005-20190220 and 2a-015-20190220

<sup>4</sup> Technical consultation on updates to national planning policy and guidance, October 2018, and Government response to the technical consultation, February 2019.

12. Having concluded that the standard method should be followed instead of the Council's bespoke method, the latest available information should be used to derive the most up to date housing need figure for the district. With the latest affordability ratio published in March, it is possible to derive the local housing need figure as follows:

2014 based household projection for 2024-34	391 dpa
Latest affordability ratio 10.80 so uplift	1.425
Local Housing Need 2024-34	557 dpa <sup>5</sup>
Local Housing Need 2024-40 (16 years)	8,900 dwellings

13. The local housing need methodology takes account of any previous over or under supply, so there is no shortfall or surplus arising pre 2024 to add to this figure.

## **Housing Requirement**

14. The housing requirement to be delivered by the plan should be the same as the local housing need figure as there is no justification to increase the figure to accommodate an employment led approach or to meet the unmet needs of a neighbouring authority, nor to reduce the figure as a result of significant environmental or other constraints that mean the need cannot reasonably be met within the district.

## **Five Year Housing Land Requirement**

15. Paragraph 68 of the NPPF requires the plan to identify a supply of specific, deliverable sites for the first five years. With adoption likely by April 2025, the plan should identify a suitable supply for the period 2025-2030. With a 5% buffer<sup>6</sup>, this should be at least  $557 \times 5 + 5\% = 2,925$  dwellings, plus any shortfall from 2024/25.

## **Spatial Strategy and Site Selection**

16. The spatial strategy of the plan (Policy SS1) is based on a settlement hierarchy with five tiers – Large Growth Towns (Cromer, North Walsham and Fakenham), five Small Growth Towns, four Large Growth Villages, 22 Small Growth Villages and Countryside. For sustainability and accessibility reasons the plan aims to direct the majority of growth towards the larger towns with successively lower levels of growth in the case of the lower tiers with fewer services and facilities. This is a justified approach. The methodology for arriving at the hierarchy is set out in Background Paper 2 (C2) and the site selection methodology in Background Paper 6 (C6); neither were subject to serious dispute at the hearings. The apportionment of growth to the towns and large growth villages is not however prescriptive and site allocations are made on a detailed assessment of promoted sites for their availability and suitability. The results of this exercise are set out in the site assessment

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<sup>5</sup> The figure is uncapped as it is below 560 dpa

<sup>6</sup> NPPF Paragraph 74

booklets for each individual settlement (D1-D12) and the conclusions are supported by the evidence unless stated otherwise below.

## **Overall Housing Provision in the Plan**

17. During the plan period, housing would be provided in the following ways which are discussed in turn:

- (i) allocations being made in the plan
- (ii) the small growth village policy
- (iii) large and small sites with planning permission as at April 2023
- (iv) windfall sites that arise during the plan period

### **(i) Allocations being made in the plan**

18. The plan proposes a series of allocations which were selected using the process described above. With the exceptions set out below, the allocations are justified by the evidence and suitable for inclusion in the plan. In relation to the timing of development on these sites, the Council's latest trajectory (EH013(l)) acknowledges slippage in some cases from that expected in the submission plan. However, the trajectory still appears unduly optimistic in the case of the two large allocations at North Walsham and Fakenham and this has significant implications for housing delivery in the plan period. My conclusions in this respect are also explained below.

### **North Walsham**

19. North Walsham is a large growth town without significant environmental or landscape constraints and has been correctly identified as suitable for large scale development in the plan. There are however a number of highway concerns affecting key junctions and some residential roads caused by the nature of the road network, three low railway bridges and the location of the main industrial area to the north of the town. Without improvement, major development would exacerbate these issues and the strategy to concentrate growth to the west of the town in conjunction with a new western link road (WLR) is a well evidenced response.

20. The plan as submitted proposes a WLR linking Norwich Road, Cromer Road and the industrial estate in conjunction with the allocation of Site NW62/A (Land West of North Walsham) for mixed use including 2,000 dwellings<sup>7</sup>. However, the transport assessment dated November 2023 (EX017/EX018) concludes that a northern extension of the WLR over the railway line to the industrial estate is not necessary to mitigate the traffic impacts of the development. Such an extension would in any event involve major road widening/new construction and potentially a new railway bridge, with serious implications for scheme viability. In addition, the extension would encourage heavy goods vehicles (HGV) from the industrial estate to use the Norwich Road (B1150), increasing HGV flows on a sub-optimal route through the villages of Coltishall and Horstead.

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<sup>7</sup> 1,800 dwellings and elderly accommodation totalling 200 dwelling equivalents.

21. The Council therefore seek a modification to the plan to reduce the WLR to a link between Norwich Road and Cromer Road, with any northern extension a matter for the future. Whilst a shorter WLR would reduce its benefit to the town, with many HGV movements to and from the industrial estate still needing to pass through the town centre and along the residential Aylsham Road, the extension is effectively undeliverable at this time.
22. With this modification the potential access arrangements for a small part of the allocation to the north of the railway line are unclear. Intended to facilitate the WLR extension to the industrial estate, without the extension this area would comprise an isolated area of housing development, poorly related to the town and an unjustified intrusion into the countryside. This part of the allocation should therefore be deleted from the plan. This would not significantly affect the 2,000 dwelling capacity of the allocation.
23. The 2.4 ha employment allocation Land East of Bradfield Road (NW52) is also intended to facilitate a link from the industrial estate to the WLR and without it would undesirably increase HGV movements through the town. The site is not essential for employment purposes in the plan period as explained in paragraphs 50-53 below and would encroach into the countryside to the north-west of the town. The site should therefore be deleted from the plan pending consideration of any northern extension of the WLR in the future.
24. The timing of the development west of the town is not clear at this stage. Although much preparatory work has been done, the overall scheme is complex, with two roundabouts needed to gain access to the initial phases, off-site highway improvements, some before construction can commence in earnest, and much legal and technical work required. The consortium's evidence on timing has been inconsistent, indicating the situation is still fluid, and only a 'high level' Gantt chart with little detail has been produced. It is intended to submit an outline planning application in Summer 2024 with approval anticipated by the end of 2025, after which reserved matters, technical approvals and early site works will be required before house construction can commence. The viability assessment allows two years for these processes, to the end of 2027, and then 9 months until the first house completions in 2028/29. The plan as submitted assumed completions would commence in 2026/27 whilst the latest schedule indicates slippage of a year to 2027/28. However, the current level of uncertainty and clear scope for delay suggests 2028/29 for the first completions is more likely, slippage of two years from the submitted plan. Indeed, this is still optimistic in the light of the findings of the Lichfields Start to Finish research.
25. In terms of anticipated completion rates, the development will overlap with the build out of Site NW01/B (Land at Norwich Road & Nursery Drive), a more straightforward site with hybrid planning permission due to be issued shortly. House completions and a care home on this site from 2026/27 to 2033/34 are likely to compete with those coming forward on NW62/A. The completion rate provided at the hearing of an average of 100 dpa based on two outlets, with periodic tranches of elderly accommodation, as originally put forward in the submitted plan, is thus more realistic than the overly

optimistic and widely fluctuating profile of completions in the latest schedule. The plan should therefore assume the trajectory in the submitted plan but delayed by two years. The upshot of this is the provision of about 1,270 dwellings on the site during the plan period instead of the 1,596 shown on the Council's latest schedule, a reduction of 326.

## **Fakenham**

26. Significant development was proposed for Fakenham, another large growth town, when 85 ha of primarily agricultural land north of Rudham Stile Lane was allocated in the Council's Site Allocations DPD adopted in 2011. Progress in delivering the main site however has been slow, with a development brief approved in 2015 and outline planning permission for up to 950 dwellings on the area east of Water Moor Lane only granted in 2021 following a four-year determination period. Several reserved matters still remain to be resolved, the means to address the nutrient neutrality issue that emerged in 2022 are not yet fully identified, and no developer is currently in place. As a result, the latest trajectory assumes the scheme will start to deliver completions in 2027/28, three years later than the 2024/25 date in the plan as submitted. Completions are projected to rise to an average of 100 pa from two outlets. Whilst many steps still need to be taken, this should be achievable.
27. Whilst the site east of Water Moor Lane is thus a commitment, that to the west has no planning permission in place and consequently is reallocated in the local plan as Site F01/B (Land North of Rudham Stile Lane) for about 627 dwellings<sup>8</sup>. The site is in effect a continuation of that to the east and for the most part is in the hands of the same institutional landowner. The strategy for development of the allocation forms part of that drawn up for the wider site and there is little doubt that the necessary applications will be made in due course to enable the full site to be built out. However, the delays so far will have a knock-on effect on the timing of completions.
28. Whilst there may be some overlap between the development of the land east and west of Water Moor Lane the sites would be in direct competition. The plan as submitted assumed that building on the land to the west would pick up as that to the east winds down, the most likely scenario. However, the Council's latest trajectory for delivery of the site is the same as that in the submitted plan, with no allowance for slippage. There is no evidence for this, and delivery in parallel of up to 200 or so dwellings a year is unlikely. A more realistic assumption is that building on the land to the west would be delayed by three years from the date assumed in the submitted plan, like that to the east. Completions from both sites together would then peak at a maximum of 150 in a single year. This would mean Site F01/B starting delivery in 2035/36 with the profile then as in the submitted plan. The upshot of this is the provision of about 327 dwellings on the site during the plan period (plus 950 on the site to the east) instead of the 627 shown on the Council's schedule, a reduction of 300.

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<sup>8</sup> 560 dwellings and elderly accommodation totalling 67 dwelling equivalents.

## **Cromer**

29. The plan as submitted allocates three sites in Cromer, the third large growth town. Two lie in the Norfolk Coast National Landscape (formerly Area of Outstanding Natural Beauty), the Former Golf Practice Ground, Overstrand Road (C16) for 150 dwellings and Land West of Pine Tree Farm (C22/2) for 400 dwellings plus an element of elderly accommodation in each case. Whilst major developments in relation to Cromer the requirement for growth to meet local housing need and the town's position in the settlement hierarchy constitute exceptional circumstances to justify the developments in the public interest. However, a further site outside the National Landscape, Land at Runton Road/Clifton Park was proposed as an allocation for 90 dwellings in the 2019 draft plan but was not carried forward into the submitted plan. The merits of this site should clearly be reconsidered as one of the options under paragraph 48(i) below. Site CO7/2 (Land at Cromer High Station) has been allocated since 2011 without development coming forward and in the circumstances none should be assumed in this plan period.

## **Wells**

30. Wells lies within the Norfolk Coast National Landscape, but as a small growth town with particularly high house prices and second/holiday home ownership, there are exceptional circumstances that justify further housing development in the public interest where suitable sites are available. The submitted plan allocates two sites, with Site W01/1 (Land South of Ashburton Close) forming a natural extension to the Home Piece Road estate, a recent scheme which demonstrates how the town can acceptably expand away from the front.

31. However, the second allocation, Site W07/1 (Land adjacent Holkham Road) lies on the coastal side of the ridge which extends to the west of the town. The site comprises the top section of a grassed field which rises from the B1105 Holkham Road at about sea level up to the 20 m contour and the rear gardens of the houses fronting Mill Road on the ridge. The site enjoys wide views to the north over the Wells salt marshes, harbour, Holkham Meals and reclaimed farmland as far as Lady Ann's Drive, but the corollary of this exposed position is the impact that housing development on the site would have on this sensitive and nationally defined heritage coast landscape.

32. The site is well screened from Holkham Road by the roadside hedgerow but is clearly seen in intermittent long-distance views from the North Norfolk Coast Path from the café at the end of Lady Ann's Drive to Wells beach car park, and most seriously in ever closer views when approaching the town along the top of the Beach Road embankment, a heavily used route which also forms part of the long distance path. The scheme would also be intrusive when seen from the Wells Town football ground and overflow car park area. Whilst the houses along Mill Road would lie behind the development on the skyline, the trees within and at the back of their long rear gardens do much to mitigate their impact. By contrast, a new development of 50 dwellings along

the top of the field, however well designed and landscaped on its northern edge, would appear raw and intrusive in the landscape for many years.

33. The site itself lies just within the Rolling Open Farmland landscape character type (LCT)<sup>9</sup> but is heavily influenced by its position overlooking the Drained Coastal Marshes and Open Coastal Marshes LCTs. Contrary to the landscape guidance for these LCTs the proposed allocation would consolidate a form of linear sprawl along the undeveloped coast, intrude into views inland from the coastal marshes, detracting from their naturalistic nature and reducing their relative tranquillity and remoteness, including at night when additional light sources on the ridge would erode the dark night sky.
34. The proposed access to the site from Mill Road, cutting across an attractive grass paddock in front of the Mill Farm buildings and adjacent to Nos 106-110, would also be an unduly intrusive feature. It would be poorly related to the housing estate behind, an odd entrance to the scheme, both spoiling the existing paddock and urbanising the A149 western approach to the town.
35. For these reasons the evidence base supporting the allocation is flawed. In particular, the landscape impact assessment under the site selection methodology should be red – the landscape impact on a sensitive landscape cannot be mitigated – rather than amber – mitigation would be possible. There is no clear physical boundary on the ground to distinguish this site from the larger site W07 of which it forms part, and which has rightly been assessed as unsuitable for development. The allocation of Site W07/1 is not justified and thus it should be deleted from the plan.

### **Sheringham**

36. Full planning permission has been granted and construction is well underway on Site SH07 (Former allotments, Weybourne Road, adjacent to The Reef). The allocation should now be deleted from the plan.

### **Hoveton**

37. In the case of Site HV01/B (Land East of Tunstead Road), the Council are proposing that the allocation as submitted should be extended to the north with the site capacity increased from 120 to 150 dwellings plus elderly accommodation. Although there was some discussion about the larger site at the hearings, the extension proposal has not been subject to full public consultation, and this should be carried out as part of the process outlined in paragraph 58 below.

### **Ludham**

38. Site LUD06/A (Land at Eastern End of Grange Road) has been allocated since 2011 with no development coming forward. The access is constrained by the presence of preserved trees with no evidence this can be overcome. The allocation should therefore be deleted from the plan.

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<sup>9</sup> As defined by the North Norfolk Landscape Character Assessment SPD January 2021

## (ii) The Small Growth Villages Policy

39. The strategy in Policy SS1 and set out in Appendix 4 relating to Small Growth Villages is not justified or effective as submitted. Whilst it is potentially a sound approach to specify an acceptable percentage growth figure for such settlements rather than to allocate sites in the plan, the approach is inherently uncertain and brings significant disadvantages both for the communities concerned and other interested parties. However, there are precedents for such an approach (eg Breckland Local Plan Policy HOU04) and should the Council wish to pursue it, some modifications would be required.

40. In particular, these are:

- the stipulation that no further permissions will be granted after the village 'allowance' is reached is arbitrary and not justified. The policy should be reworded to allow 'not significantly more than' a 6% increase in dwellings.
- there is no justification for an arbitrary quantitative limit on new dwelling provision within the defined settlement boundaries at any time.
- criterion (e) should be deleted as there is no justification for small sites to incorporate substantial community benefits. Any requirements to make the development acceptable can be secured under Policy HC4.
- criterion (f) is not justified as currently worded and would render the policy ineffective by causing uncertainty and acting to deter schemes coming forward<sup>10</sup>. The criterion could however be reworded to state that suitable schemes proposed in partnership with a registered social landlord that would deliver affordable housing in excess of the normal Policy HOU2 requirement will receive particularly favourable consideration.
- Horning should be treated as a 'Constrained Small Growth Village' and the indicative housing allowance (31 in the revised list in document A5.11) set at 0 as there is no realistic prospect of the local water recycling centre meeting the required environmental standards in the foreseeable future. This is due to unstable ground conditions and a permanently high water table leading to groundwater infiltration of the sewerage network for which no solutions have yet been identified.

41. The total provision from this source over the plan period should therefore be reduced from 453 to 422 dwellings starting in 2027/28 as the policy only commences on adoption of the plan. However, there is considerable scope for widening the policy as explained in paragraph 48 below.

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<sup>10</sup> Breckland Local Plan Policy HOU04 does not contain such a criterion.

### **(iii) Large and Small Sites with Planning Permission as at April 2023**

42. The Council's monitoring of sites with planning permission as at April 2023 indicates 1,646 dwellings are likely to come forward during the plan period 2024-40 on large sites of over 10 dwellings (950 of these on the site north of Rudham Stile Lane at Fakenham) and 441 on small sites. These figures allow for a non-implementation rate.

### **(iv) Windfall sites that arise during the plan period**

43. The submitted plan was based on April 2021 monitoring data and assumed that previously unidentified windfall sites would start to contribute housing completions just one year later, in 2022/23. However, the latest trajectory, with planning permissions recorded as at April 2023, assumes a two-year gap with windfall sites making a contribution from 2025/26. This is a reasonable assumption. The likely contribution from this source can only ever be an estimate, with the submitted plan assuming 135 dpa, a cautious figure well below the historic average of 295 dpa which came forward from windfall sites during the period 2016-23. It should be noted that under Policy SS1 windfall sites in 22 small growth villages will now count towards a separate total.

44. In the letter dated 25 March 2024 (EH013(k)) the Council propose that the windfall allowance for the period 2029/30 to 2039/40 should be increased to 180 dpa, an additional contribution of 495 dwellings over the plan period. This is considered in paragraph 47 below.

## **Overall Housing Provision in relation to the Requirement**

45. With the adjustments set out above, the overall conclusion is that the plan would provide about 8,212 dwellings over the plan period 2024-40 towards the overall requirement of 8,900, a shortfall of about 700 dwellings. In relation to housing land supply for the five-year period 2025-30, the plan would provide about 2,893 dwellings compared to a requirement of 2,925 dwellings. When the shortfall from 2024/25 is added, this would amount to a significant undersupply and there would be no allowance for any unforeseen contingencies.

## **Housing Provision – Way Forward**

46. Unfortunately, for the reasons set out above, the plan does not at present provide sufficient housing to meet the housing needs of the district over the full plan period, with a projected shortfall in both the early and later years. There is an initial five-year housing land supply shortfall. Furthermore, should the planned allocations or other sites not come forward as currently anticipated, which is quite possible, the shortfall in the early years would increase. A standard plan review after five years would not address this early-years issue, although it could bring forward further land later in the plan period if necessary. I am not therefore able to conclude at present that the plan is positively prepared, meeting the objectively assessed needs of the district, one of the tests of soundness in paragraph 35 of the NPPF.

47. The shortfall is about 700 dwellings, but this allows no contingency for unforeseen events such as further slippage of the large allocations, the non-implementation of smaller allocations, the small growth villages policy not working as intended or insufficient windfall sites coming forward. The need for schemes to deliver nutrient neutrality in much of the district, with solutions still uncertain at the time of writing, is a factor here. Therefore, as matters currently stand, the provision made by the submitted plan should be increased by at least 1,000 dwellings to allow some flexibility. I do however agree that in North Norfolk with its numerous settlements and extensive countryside there is enough scope for windfall sites to come forward that the Council's revised estimate of an additional 495 dwellings from this source over the plan period can go some way to filling the gap.

48. However, excessive reliance on unspecified windfall sites adds uncertainty to the plan and more concrete steps need to be taken to bring forward more housing in the plan period, particularly in the early years. The options available include, and there may be others:

- (i) Additional or extended allocations in large and small growth towns and large growth villages in accordance with the spatial strategy and settlement hierarchy of the plan. Whilst further sites in Fakenham and North Walsham should not be ruled out, they may divert some demand from the large-scale developments already proposed for these towns.
- (ii) Increasing the expansion of small growth villages above 6%.
- (iii) Expansion of the list of small growth villages to include those with a single key service or (say) three secondary/desirable services. As document EX034(a) demonstrates, there are numerous villages with a primary school, convenience shop or other services that are sufficiently nucleated in form to allow for a coherent settlement boundary which are not currently included.
- (iv) Inclusion of a new policy allowing sensitive infilling and rounding off in small villages and hamlets without a settlement boundary (Breckland Local Plan Policy HOU05 is an example in an area with a similarly dispersed settlement pattern). Alternatively, settlement boundaries could be defined but without any provision for development beyond the boundary.
- (v) If the allocation in the Wells Neighbourhood Plan at Two Furlongs Hill is included in the finalised plan the proposed 45 dwellings could be included in the future supply.

49. Policy support for (ii) – (iv) above is provided by paragraph 79 of the NPPF which advises that housing should be located to enhance or maintain the vitality of rural communities, opportunities should be identified for villages to grow and thrive, especially where this will support local services, and where there are groups of smaller settlements, development in one village may support services in a village nearby. As submitted the plan's policies for smaller villages, even some with key services, are unusually restrictive.

## **Employment Land**

50. Whilst much of the employment in the district lies in other sectors, with jobs in food/accommodation, agriculture and retail above the regional average, it is important to provide and protect an adequate supply of employment land for industrial and other businesses to develop and thrive. To secure this, Policy E1 in the submitted plan seeks to allocate 200 ha of existing, 54 ha of undeveloped and 16 ha of new employment land in the various settlements across the district, 271 ha in all<sup>11</sup>. There is much redevelopment of existing employment land as the needs of individual businesses change, but the scope for 70 ha of new development is more than sufficient to accommodate the most optimistic projection for a take up of 40 ha during the submitted plan period 2016-36. Other projections indicate that the realistic requirement is in fact much less, perhaps as low as 6.5 ha.
51. Unfortunately, the owner of the proposed 6 ha employment allocation at Heath Farm, Holt (Site H27/1) does not now wish to pursue development, and as explained in paragraph 23, the 2.4 ha allocation east of Bradfield Road, North Walsham (Site NW52) should also be deleted from the plan. However, even with 8.4 ha less provision for new development and a plan period extended by four years to 2040, there would still be sufficient land being made available to meet the likely need.
52. This is particularly the case as it is proposed to amend Policy E3 to allow scope for employment development outside designated areas if no suitable land is available within them. In addition, Policy E3 could include support for alternative proposals to come forward in Holt if suitable sites become available, as the withdrawal of the allocation results in a lack of employment land options in the town.
53. Overall therefore, there are no significant soundness issues in relation to the provision of employment land in the plan.

## **Gypsy, traveller and travelling showpeople's accommodation**

54. Policy HOU5 seeks to meet the accommodation needs of gypsies, travellers and travelling showpeople in the district with a criteria-based policy on the basis that the latest needs assessment demonstrates that the requirement for further sites is likely to be very small. However, that assessment<sup>12</sup> is based on seven-year old fieldwork with its most accurate projections of need relating to the five-year period 2017-22.
55. With the passage of time the evidence base of the plan is not now sufficiently robust to assess future need in order to set pitch/plot targets in accordance with paragraph 9 of the Planning Policy for Traveller Sites<sup>13</sup>, nor, if necessary, to identify a supply of sites in accordance with paragraphs 10-11. The

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<sup>11</sup> Corrected figures, the new allocation at Stalham is 1 ha

<sup>12</sup> Norfolk Caravans and Houseboats Accommodation Needs Assessment including for Gypsies, Travellers and Travelling Show People, RRR Consultancy Ltd, October 2017

<sup>13</sup> December 2023 version

existing assessment also pre-dates the change in the definition of gypsies, travellers and travelling showpeople made in December 2023.

56. In order to ensure the plan is sound, the Council should therefore commission an updated study to assess need in accordance with latest best practice and then to consider what steps might need to be taken to address its findings in the plan, including if necessary proposing allocations or amending the criteria in Policy HOU5.

## Conclusion

57. Whilst the Council may be disappointed that it is not possible to move directly to the main modifications stage, there is a clear way forward for the plan if the shortfall in housing provision is addressed together with any implications of an up to date accommodation assessment for gypsies, travellers and travelling showpeople.
58. The Council will no doubt wish to take some time to consider how to address the housing provision issue. Please keep me informed of progress. In due course I should be advised of the suggested changes to the submitted plan to ensure they have the potential to overcome the soundness issue, after which the Council should carry out a six-week public consultation exercise on those changes. Assuming the Council wish to proceed in the light of the response, any representations made would be treated as representations on the local plan and would be considered as part of any future resumed hearings that may be necessary.
59. In due course I would be grateful for a formal response to this letter setting out how the Council wish to proceed and the anticipated timetable for the work that is necessary.
60. This letter should be placed on the examination website for information. I will ask the programme officer to inform hearing participants when it is published but I am not inviting or accepting submissions from other parties at this stage.

## INSPECTOR



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