

Details of Representations Received to the Proposed Submission Local Plan (Reg19) February 2025

Swanmore Allocations

This document has been prepared to provide details of the representations received to the Proposed Submission Plan and the Council's response. It draws upon information contained within the submitted documents SD07b [*Regulation 22 Statement of Consultation Part 2 \(November 2024\)*](#) and SD16 [*Regulation 20 representations \(November 2024\)*](#). It is not considered that this document contains information which is substantially different to that set out within those submitted documents, but it has been prepared to assist in navigating and considering the representations received and Council Response.

For each plan policy or associated document, it sets out some key information from the regulation 22 statement regarding the number of representations received, representation numbers, an overall summary of responses made, and a list of the main issues raised by the representations. It then contains all of the representations recorded against that Plan policy or document, along with links to supporting documents. Finally, it sets out the Council's response to the representations made for that Plan policy or document, and any changes the Council now recommends are made to the Plan policy or document, alongside any other relevant information.

Local Plan Reference or document	Policy SW1 The Lakes	
Total Number of Representations received	4	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	2	1
Sound	1	2
Complies with Duty to Cooperate	2	1
<p>Summary of Representations</p> <p>The local education authority raised concerns that the development would cause a need for additional education places. Contributions towards all phases of education may be required.</p> <p>The local water and sewage supplier - Southern Water – supported the criteria requiring the alignment of the delivery of housing with that of sewage infrastructure and the criteria allowing for future access for maintenance and upsizing of sewage infrastructure. However, they are also seeking specific requirements for easement sizes each side of pipe infrastructure.</p> <p>There was both disagreement with and support for, the revised hierarchy and consequential recategorization of Swanmore as a Large Rural Settlement.</p> <p>There was disagreement locally with the methodology of the hierarchy review. There was criticism of the scoring for some criteria of facilities and services and comparisons were made with the scoring in the hierarchy for other settlements, with alleged inconsistencies in application and in-appropriate weighting.</p> <p>There was also local support for not allocating a SHELAA site at Reg 18 stage, citing its presence within the settlement gap and that an additional site is not required for the amount of housing allocated for Swanmore. There were also local concerns regarding that potential site development related to flooding/drainage, road safety, ecological and biodiversity concerns and the health risks associated with proximity to high voltage pylons.</p> <p>However, one respondent considered the re-assessment of Swanmore since Reg 18 was an appropriate reflection of its range of services and facilities. They considered Swanmore to be a sustainable settlement for new housing.</p> <p>This respondent suggested that there is a need to increase the amount of development in the MTRA to ensure that the rural settlements maintain their vitality and viability. Therefore, additional allocations should be considered, notwithstanding that existing allocations have not yet been completed.</p> <p>Furthermore, this respondent disagreed with the findings of The Settlement Gap Review (July 2024) and asserted that the allocation of SW1 shows that the principle of development within the gap (away from sensitive SDNP) is acceptable. A site to the north of Swanmore within the gap would not conflict with the identified important features of the gap and should be considered for development</p>		
Representation Numbers (Statutory consultees in bold and named)		

ANON-AQTS-32TA-K/3/SW1

ANON-AQTS-327U-A - Southern Water/33/SW1

ANON-AQTS-32NN-T - Swanmore Parish Council/1/SW1

BHLF-AQTS-328R-8 - Hampshire County Council/26/SW1

Main issues raised in representations received in regulation 19 consultation

- Settlement hierarchy – position of Swanmore and appropriateness of amount of housing allocated;
- Evidence base – hierarchy review;
- Evidence base – settlement gap review;
- Education provision; and
- Sewage infrastructure provision.

Policy/Evidence base document	SW1
Name of respondent (or client)	Neil Massie
Personal reference number	BHLF-AQTS-328R-8 - Hampshire County Council
Full reference number	BHLF-AQTS-328R-8 - Hampshire County Council/26/SW1
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	100 dwellings is likely to generate up to 30 primary age pupils and 21 secondary. The site is served by Swanmore Church of England Aided Primary School, and Swanmore College. A contribution towards all phases of education may be required.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies and evidence base)

Policy/Evidence base document	SW1
Name of respondent (or client)	Ryan Patrick Lownds
Personal reference number	ANON-AQTS-327U-A - Southern Water
Full reference number	ANON-AQTS-327U-A - Southern Water/33/SW1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>We welcome the inclusion of the criterion below for Policy SW1 The Lakes:</p> <p>Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.</p> <p>Layout of the development must be planned to ensure future access to existing underground infrastructure for maintenance and upsizing purposes.</p> <p>Supporting Text:</p> <p>Southern Water is the statutory wastewater undertaker for the area where this site is allocated. In accordance with this, we undertook an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for the proposal at the site.</p> <p>The assessment revealed that local sewerage infrastructure in closest proximity to the sites has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure.</p> <p>Proposals for the number of dwellings at the site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge, but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.</p> <p>Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 180(e) of the revised National Planning Policy Framework (NPPF) (2023).</p> <p>Our initial assessment of the site also ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of any proposed development. An easement width</p>

	of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Supporting Document (Commenting on policies)

Policy/Evidence base document	SW1
Name of respondent (or client)	Swanmore Parish Council
Personal reference number	ANON-AQTS-32NN-T - Swanmore Parish Council
Full reference number	ANON-AQTS-32NN-T - Swanmore Parish Council/1/SW1
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>(Please note that we do not wish to comment on whether the text and policy are legally compliant or comply with the duty to cooperate, these boxes had to be ticked in order for the form to be submitted).</p> <p>1. Swanmore Parish Council does not agree that the Winchester City Council Regulation 19 Local Plan meets the test of soundness as set out in the National Planning Policy Framework.</p> <p>2. Swanmore's recategorisation as a Large Rural Settlement The Regulation 19 Local Plan is not sound because Swanmore's recategorisation as a Large Rural Settlement is not justified as it is not based on proportionate evidence. Swanmore Parish Council does not accept the scoring nor the methodology of the Settlement Hierarchy document. (Please see the Settlement Hierarchy Review August 2024, paragraph 4.13).</p> <p>3. We do not accept Swanmore's recategorisation as a Large Rural Settlement, nor the methodology of the Settlement Hierarchy document. We have scored highly in areas such as open spaces and recreation facilities. This puts us in the same bracket as larger villages despite us lacking what we see as the necessary facilities to be truly sustainable, e.g., shops, health facilities and good transport links. In particular we would challenge:</p> <ul style="list-style-type: none"> • Post office facilities. We have a counter within the village shop which offers limited post office services. For example, a resident would have to travel to Fareham or Hedge End to renew their driving licence. Not all members of staff are trained so often no post office services are available. These limits are not reflected in the scoring; we score the same 1 point as Winchester where there is a designated Post Office offering a full range of services. • We are in the same category as the larger settlements of Wickham and Denmead. Wickham has more than 15 shops and Denmead more than 10. Swanmore has one shop. • Built Leisure. <p>We have not been able to find a clear definition of Built Leisure. The 2024 Settlement Hierarchy document references the Market Towns and Rural Area Development Strategy background paper published in July</p>

2011. This paper defines a leisure centre as a swimming pool. Within the Settlement Hierarchy document, Built Leisure examples are given as cinemas and leisure centres.

Winchester scored the same on Built Leisure as Swanmore. Winchester has a cinema and a new Everyone Active commercial leisure centre:

"This state-of-the-art centre features a 50m eight-lane swimming pool, teaching pool (20m x 10m) and confidence water area for all of your aquatic activities. Our 200 station fitness suite is packed with the latest equipment that's suitable for everyone regardless of your fitness level. While our three group exercise studios host a programme of group fitness classes that are suited to everyone. The unique hydrotherapy pool provides a first class environment for a range of rehabilitative therapies. Our Top Rock fun climbing facility (14 activity lines, 9m high) and an eight court sports hall provide a range of both adult and junior activities. We also boast four glass backed squash courts, a café, an outdoor terrace and Sparx Beauty treatment rooms."

Whiteley scored the same on Built Leisure as Swanmore. Whiteley has a 9 screen cinema and an Everyone Active commercial leisure centre, with gym and gym classes.

Swanmore's Built Leisure is a small gym that is part of Swanmore College. Members of the public are able to access the gym when the College is not in session, ie, evenings, weekends and school holidays.

- Daily Bus Services (hourly).

There are no bus services in Swanmore on Sunday so this score needs to be amended to the Daily Bus Services (Infrequent) score. Swanmore's services are the 69 (hourly, Monday to Saturday) and the 49 (less than hourly, Monday to Friday).

The inconsistent marking scheme can be seen if you compare Swanmore's bus services to other settlements with the same points.

Otterbourne scored the same on Bus Services as Swanmore yet has the number 1 service with a 15 mins frequency from 6.30 to 23.30 including on a Sunday.

Kings Worthy scored the same on Bus Services as Swanmore yet has the 6 with a 30 mins frequency for most of the day and a Sunday service.

4. If the above amendments are made, Swanmore will fall into the Intermediate Rural Settlement category. This seems an accurate reflection of the services and facilities in the village and we would ask that the Local Plan be modified accordingly.

5. We accept the results of the Development Strategy and Sites Proposed Submission 2024 Topic Paper; there are no further suitable development sites in Swanmore. (Please see page 28, paragraph 6.38).

6. In its response to the Regulation 18 Local Plan, Macra Ltd proposed SWA09 as a suitable development site (Please see WCC's Response to the Representations on the Regulation 18 draft Local Plan SW1 The Lakes).

The Regulation 19 Local Plan would not be sound if this development went ahead as it would be inconsistent with the guidance on sustainable development contained in the National Planning Policy Framework.

Development on SWA09 would mean an extension of the existing settlement boundary and contravene Policy NE7 Settlement Gaps, referenced in the Development Strategy and Sites Proposed Submission 2024 Topic Paper as a reason for there being no suitable sites in Swanmore (Please see page 28, paragraph 6.37). We would highlight the comments made in WCC's 2024 Settlement Gap Review at pp 45 and 50:

"A.39 The following features are important in retaining a sense of separation between Waltham Chase and Swanmore:

- a. Tree cover that limits the visual impact of development in the settlement gap.
- b. The retention of field boundaries and agricultural land use.
- c. The avoidance of further infilling of development along connecting roads."

"A.16 Hedgerows and garden boundaries constitute relatively weak boundaries to the east of Waltham Chase. The Lakes forms a consistent road and hedgerow edge along the central part of Swanmore but there are no particularly strong boundary features to denote the urban edge."

These important features would be lost if SWA09 was developed.

7. In 2022 we asked residents to locate sites which were the least worst option for development. Within this context, SWA09 was popular with residents but it was not a site proposed or supported by Swanmore Parish Council for the following reasons:

- Major concerns re flooding/ drainage issues for new and existing houses. Major concerns re: surface water flooding. According to the Government flood risk checking tool, there is a high risk of surface water flooding on this site and a medium risk of flooding from rivers: <https://check-long-term-flood-risk.service.gov.uk/map?easting=457858&northing=115442&map=SurfaceWater>
- Existing drainage issues for houses built at Horders View on The Lakes, the watercourse along The Lakes regularly floods. "The 'Hamble Brook' that is located at the side of Hamblebrook Farm, runs up The Lakes and into Forest Farm in Waltham Chase, just outside Bishop's Waltham and in July 2021 three out of the five houses in the farm were flooded."
- Major concerns re: road safety where access is on to New Road. Speeding cars, parked cars, Swanmore College pupils/ parents/ buses and the two housing developments currently under construction on The Lakes mean this a road that the Parish Council and many village residents are deeply concerned about. Swanmore College has recorded numerous "near miss" incidents involving pupils and there have been four recorded incidents over the last five years on New Road.
- Major concerns re: road safety where access is on to Gravel Hill. Speeding cars and HGVs, numerous "near miss" incidents at the Gravel Hill crossroads and 13 recorded incidents, 5 serious, over the last five years on this stretch of road.
- Proximity of high voltage pylons on the site and the current uncertainty as to potential health risks of living near to these: "Living near high voltage electrical pylons substantially increases the risks of contracting cancer, according to a study by doctors at the University of Bristol Medical School, UK." (Please see <https://cordis.europa.eu/article/id/15541-research-breakthrough-on-health-effects-of-pylons>)
- In the countryside (Policy MTRA 4) and outside of settlement gap boundary (Policy CP18).

	<ul style="list-style-type: none"> · More housing than we have been allocated, the Parish Council's view is that the total housing yield of 217 would eventually be built. · Ecology and biodiversity concerns, area is inhabited by a number of protected species.
What modification(s) are necessary to make the policy legally compliant or sound?	We would ask that Swanmore be categorised as an Intermediate Rural Settlement. This seems an accurate reflection of the services and facilities in the village and we would ask that the Local Plan be modified accordingly.
What is your suggested wording or text for the policy?	We would ask that Swanmore be categorised as an Intermediate Rural Settlement. This seems an accurate reflection of the services and facilities in the village and we would ask that the Local Plan be modified accordingly.
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	SW1
Name of respondent (or client)	Taylor Wimpey Strategic Land
Personal reference number	ANON-AQTS-32TA-K
Full reference number	ANON-AQTS-32TA-K/3/SW1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Swanmore has been recategorised as a 'larger rural settlement' which we fully support. It is a sustainable settlement for new housing with a range of services and facilities. However, no new allocations are proposed and the overall housing requirement is just 164 dwellings which is significantly lower than all other larger rural settlements. Instead, an historic allocation from the adopted Local Plan known as 'The Lakes' has been rolled forward into the new Plan under Policy SW1 for 'about 100 homes'.</p> <p>The Development Strategy and Site Selection Paper (DSSS) 2024 states at paragraph 6.38 "There is a substantial amount of land still to be developed from allocations in the previous adopted Local Plan. Therefore it is not considered appropriate to allocate sites for further development, given the constraints around this location and that the overall level of housing need can be met at other locations." However as Swanmore was incorrectly identified in a lower settlement category at the Regulation 18 stage no further housing was proposed. This has now been corrected in the Regulation 19 Plan, however no further assessment of sites suitable for allocation appears to have taken place. There is acknowledgement that Swanmore is suitable for further development which will support its position in the settlement hierarchy and as such should be allocated further housing.</p> <p>Paragraph 6.37 of the DSSS suggests that the principal constraints are the presence of the South Downs National Park (SDNP) to the immediate north and east of Swanmore and settlement gap to the south and south and west. We agree that the SDNP is a significant constraint to development and, as such, sites on the northern and eastern boundaries of the settlement are inappropriate for development.</p> <p>However, we do not agree that the settlement gap has been appropriately considered, for the reasons set out below.</p> <p>It should be noted that the adopted Local Plan Part 2 allocated development on the southern side of Swanmore within what was gap at that time, demonstrating that the removal of land from this part of the gap was acceptable. Policy SW1 carries forward development within this location in the Draft Plan.</p> <p>My clients land at Swanmore Road (SWA10) lies on the western side of Swanmore and is entirely contained within existing field parcels which benefit from boundary vegetation including hedgerows and trees. As such it is already visually well contained. Furthermore, SWA10 could be developed with an enhanced landscape buffer along its western and southern boundaries, such that the extent of built development would not extend</p>

	<p>materially further west/south into the gap than the existing development on Swanmore Road or Lower Chase Road. This would allow for a logical rounding off of the settlement. The development would be perceived as a modest extension to Swanmore. As such, the function of the gap and the separate identities of Swanmore and Bishops Waltham would not be undermined.</p> <p>The Settlement Gap Review (July 2024) fails to consider if all of the land within the Swanmore to Bishops Waltham Gap is necessary to prevent the coalescence of the settlements, having regard to maintaining their physical and visual separation, as per Partnership for South Hampshire guidance 'Policy Framework for Gaps' (2008).</p> <p>For the reasons set out above, we contend that it is not necessary to include SWA10 within the gap. Indeed, paragraph 4.9 of the Settlement Gap Review states "The following features are important in retaining a sense of separation between Bishop's Waltham and Swanmore:</p> <ul style="list-style-type: none"> • Maintenance of the gap between the edge of Swanmore and the cluster of buildings that includes Hoe Farm, so that the rural character of the latter is retained." <p>The Gap Review does not explain the significance of the cluster of buildings that includes Hoe Farm. Nonetheless, there is a large field parcel and a road (Paradise Lane) lying between this group of buildings and SWA10, with boundary vegetation along the boundaries of the field parcel. It is considered that that SWA10 could be developed with a comprehensive landscaping scheme to ensure that the rural character of the cluster of buildings to the west would be maintained.</p> <p>As such, SWA10 would not conflict with the identified important features of the gap and should not constitute a reason for discounting it as an allocation or for including in the gap.</p> <p>The second reason given for the lack of new allocations at Swanmore is that there is a "substantial level of allocated land remaining to be developed". This refers to Allocation SW1 'The Lakes', which was allocated for about 140 dwellings in the LPP2 in April 2017. However, this approach of rolling forward historic Local Plan allocations fails to positively plan for the future of Swanmore.</p> <p>As set out in our representations on Policy H1 and H3, there is a need to increase the amount of development in the MTRA to ensure that the rural settlements maintain their vitality and viability. Swanmore has been recognised as a higher order settlement in the MTRA hierarchy given the level of services and facilities on offer.</p> <p>Taylor Wimpey has a track record of successfully delivering high quality housing developments within the area. Their site at Swanmore Road is free from any significant constraints and should therefore be allocated for the development.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>Land at Swanmore Road, Swanmore (ref. SWA10) should be allocated for residential development. The Policies Map should also be amended to show the allocation of SWA10.</p>

What is your suggested wording or text for the policy?	A new allocation for Land at Swanmore Road, Swanmore (ref. SWA10) for about 225 dwellings should be added to the larger rural settlements grouping of allocations within the MTRA section of the Plan (starting at pg. 386). The table on pages 389 and 390 should be updated accordingly. Paragraph 14.99 should be amended to refer to a capacity of about 385 dwellings and the table 'Swanmore Housing Sources' on pg 447 should be amended to include the new allocation at Land at Swanmore Road.
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies and evidence base)

WCC Response.
Comments noted.
WCC Recommended Changes arising from representations:
No changes apart from: Proposed Modification to criterion vii to Policy SW1 in respect of health and wellbeing infrastructure in response to the HLOW ICB representation.