# WINCHESTER CITY COUNCIL LOCAL PLAN EXAMINATION - STAGE 1 HEARINGS

MATTER 8: DEVELOPMENT ALLOCATIONS THE MARKET TOWNS AND RURAL AREAS (MTRAS)

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# REPORT CONTROL

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## 1.0 INTRODUCTION

- 1.1 On behalf of Barwood Land, Grass Roots Planning have been instructed to make various representations to the emerging Local Plan (LP) for Winchester City Council (WCC) in which we have also sought to promote a site for housing allocation, referred to as Land north of Cranbourne Drive, Otterbourne. Our involvement in this site stretches back to autumn 2022 when we were commissioned to undertake consultation with the Parish Council (PC) and local community on potential proposals for this site and to make representations to the Council's Reg.18 LP (and later Reg 19) consultations.
- 1.2 We have set out our representations within the earlier consultation stages to the LP, which represent our position on the plan and its constituent parts, however this statement seeks to elaborate on the issues and concerns previously raised and respond to the Inspector's Matters, Issus and Questions (MIQs) set out in the Inspector Note 2 V2 (ED13).
- 1.3 This statement relates to Matter 8 Development Allocations for the Market Towns and Rural Areas (MTRAs) specifically responding on the allocation at the Larger Village of Otterbourne OT01 Land off Main Road.

Issue: Whether the proposed housing site allocations in MTRAs would be justified, effective and consistent with national policy?

#### Intermediate Rural Settlements - Otterbourne

- 1. Housing need in Otterbourne is proposed to be met through an allocation in this Plan, windfall and net completions in or adjoining the settlement. In this respect would the Plan be positively prepared and robustly justified by the evidence?
- 1.4 In response to question 1 we do not believe housing need in Otterbourne will be suitably met through the proposed allocation; nor potential windfall / net completions. Policy OT01 is not considered to have been positively prepared or indeed justified by the available evidence base, and we therefore find the policy to be unsound.

## Housing Need

1.5 As we have highlighted within our response to Matter 4, the updated Standard Method (SM) highlights that there is an acute housing need across the district which reflects the national housing crisis. We are referring to this point regarding Matter 8 as it is not considered that the quantum of housing that WCC is currently allocating to those intermediate and larger rural settlements, actually accounts for the needs of these areas (including affordable housing

needs) and falls far below what could successfully be delivered, based on the sites available as shown through WCC's Strategic Housing and Employment Land Availability Assessment (SHELAA). As highlighted in our response to Matter 4, affordability in this region is a highly significant issue, as one of the least affordable locations in the UK when considering wage to house price ratios.

- 1.6 With regard to affordable housing, according to 'Hampshire Home Choice', only 6 affordable housing units have been made available in Otterbourne for those on the waiting list to bid on in the last 5 years. The average wait time for those looking for an affordable home in Otterbourne is 92 weeks, putting it in the top 10 of Winchester settlements (out of 52) with the longest average waiting time.
- 1.7 Based on the sustainable credentials of the settlement it is clear that intermediate and larger rural settlements such as Otterbourne could and should support a higher housing figure and make a greater contribution towards meeting Winchester's acute housing need, including affordable housing.

#### Settlement Hierarchy

- 1.8 As we have highlighted within our response to Matter 2, we do not consider that the village of Otterbourne has been robustly assessed through the Settlement Hierarchy and indeed based on the local facilities available within reach via active travel modes and public transport. As a result, the village should have been classed as a Larger Rural Settlement (with a score of 22-26) as opposed to a Intermediate Rural Settlement (where settlements score between 18 21). Further specific detail in this regard is set out in our response to Matter 2 and the review of the settlement hierarchy.
- 1.9 We consider that as an Intermediate Rural Centre, Otterbourne should have been considered suitable to deliver (at least) 90-100 dwellings, as opposed to the 55 dwellings currently allocated to it. It should also be noted here, as has been clearly reiterated within our representations to Matter 4, based on the updated SM introduced alongside the updated Framework Dec 2024 (and acknowledging the significant affordability issues facing the district) a significantly higher housing figure should be progressed overall and more specifically for those larger / intermediate settlements. A sustainable settlement such as Otterbourne is considered more than suitable to assist in meeting this additional need.
- 1.10 Para 9.28 of the submitted LP states that the "smaller 'intermediate' rural settlements have modest housing provision, as they do not benefit from significant commitments or completions". As we have previously highlighted, this approach is clearly inappropriate as the chosen growth strategy should be focused on the sustainability and suitableness of a place

rather than previous commitments. Simply following past trends is not a rational way to plan and is as unsound as it is unjustified.

1.11 Looking more closely at how the housing need allocated is met through the LP, firstly we agree that new allocation/s are required. However, we do not consider the current allocation is suitable to meet the proposed capacity and therefore a larger allocation is necessary and / or additional sites be allocated in order to meet this need. If additional sites are not considered, at least a reserve site should be allocated to cover non delivery and / or the need to meet a higher housing requirement. In this regard a site such as that promoted by Barwood Land – Land off Cranbourne Drive, Otterbourne, is more than suitable to meet this need. The site is considered to be both deliverable / developable in the SHELAA and there is also a current outline application with WCC for determination on this site for the development of up to 65 dwellings (including affordable housing), a 70-bed residential care home (C2) and 0.24 ha of land safeguarded for a community/ health facility alongside the provision of public open space, play facilities, sustainable urban drainage, ecological mitigation and supporting infrastructure (25/00159/OUT), highlighting the availability of this site to meet an acknowledged housing need in the short term.

#### MTRA3a Windfall Allowance

- 1.12 Regarding the windfall allowance, the Assessment of Windfall Trends and Potential Report (2021) states that "A potential windfall supply for the MTRA3a settlements as a whole has been calculated as 45 dwellings (3 dwellings per annum over 15 years)". Reviewing the LP housing sources for Hursley (pg. 481), Otterbourne (pg. 485), South Wonston (pg. 491) and Sutton Scotney (pg. 499) this shows that these settlements have each been given a windfall allowance of 20 dwellings which does not follow the evidence set out in the Assessment. The Council is placing an over reliance on the delivery of windfall development in the smaller settlements when they should be ensuring the delivery of larger allocations in these settlements to provide greater certainty that the overall housing requirement will be met.
- 1.13 As the LP has apportioned a need for the various settlements, evidenced as being met through allocations, windfall development and existing commitments/ completions. If the windfall allowance for an area is too high, to meet that need a larger allocation would be required, which we consider to be the case for Otterbourne.
- 1.14 Otterbourne has a windfall allowance of 20 dwellings over the plan period to 2040. However, the Assessment of Windfall Trends and Potential Report (2021) highlights that just 5 dwellings were delivered over the 11-year period between 2012 2023 and as of 2023 there were no outstanding commitments. Based on this evidence, a windfall allowance of 20 dwellings is far too high and will lead to under delivery. It is considered more realistic to

suggest a windfall allowance of around 9 dwellings and based on the currently progressed need figures, this would require the allocation of a site capable of delivering at least 64 dwellings.

## **Housing Completions**

- 1.15 Finally, on this point regarding completions, as highlighted in our response to Matter 4 we do not consider it appropriate to include completions dating back to 2020 to inform the current supply. Page 483 of the Local Plan suggests that "in or adjoining" Otterbourne, there have been 4no. completions since 2020. However, it is unclear which site/s account for the 4 dwellings and therefore we cannot be specific on the reduction.
- 1.16 The 2020-2021 AMR suggests that there was a net loss of 3no. dwellings in Otterbourne within this period. The 2021-2022 AMR then suggests 4no. dwellings were approved. This would equate to a net gain of 1no unit and the later AMR's do not include further permissions in Otterbourne.
- 1.17 Whilst the difference of 3 dwellings is relatively minor in the grand scheme of things, it clearly points to issues with the Council's evidence base and data transparency, with no clear and detailed housing data available for smaller site completions since 2020. Data analysis has clearly been an issue already for WCC as the Council were required to amend its housing figures post submission given they had incorrectly included gross rather than net housing completions. The above AMRs further suggest issues with gross and net calculations. This must be interrogated further.

## Otterbourne's Progressed Allocation

- 1.18 Referring to the current allocation OT01, as we have set out in our representations to both the Reg. 18 and 19 LP, there are numerous concerns regarding the deliverability of this site and Policy OT01 is considered to be unsound as it is not justified by robust evidence, or an appropriate assessment of alternative sites to support its allocation.
- 1.19 The site is considered inadequate to deliver the minimum housing numbers required in Otterbourne and has a series of constraints which have yet to be appropriately addressed. This means that when viewed against an alternative option for the village i.e. Land off Cranbourne Drive (promoted by Barwood Land OT08 in the SHELAA with an application pending determination), one that is less constrained and offers significantly greater benefits, questions are raised as to why Land off Main Road was progressed as the preferred allocation.

- 1.20 Through our representations and correspondence with WCC's Policy Team we have raised concerns in relation to the evidence supporting this allocation which has not been addressed, a failure resulting no doubt from the lack of time available due to fast-tracking the LP to examination (see appendix 2 of Barwood's representations to the Reg. 19 LP).
- 1.21 The following summarises the concerns we have regarding the current allocation:
  - The developable area (when subtracting the land designated for open space) is not large enough to deliver the allocated 55 dwellings. The masterplan submitted for the previous applications on this site show only c. 33 dwellings in this area. Either an extremely dense development would result or further encroachment on adjacent open space.
  - The previously refused applications highlight landscape and access concerns, including an unacceptable impact on the local landscape character, and the setting of the village.
  - There is no strong defensible boundary in this location to restrict future development, which could lead to further development creep into the open countryside.
  - There is no evidence of the promoter's ability to gift the remaining land east of the public right of way to the PC as open space.
  - The site is well-used, publicly accessible land and development here would impact currently unspoilt views from the public footpath.
  - There are safety concerns regarding the addition of a further arm off the Coles Mead roundabout required for access.
  - The distance between the school and the site would be less likely to encourage walking to school and could therefore increase traffic at peak times.
  - Potential impacts on the setting of listed buildings in proximity incl. (Old Parsonage or Otterbourne House), consideration also required in terms of how archaeology on site is addressed.
  - There are ecological concerns regarding inc. a TPO which would be impacted by implementing the proposed access.
- 1.22 As we have highlighted in previous representations, two planning applications have previously been submitted on this site in 2016 (16/02115/OUT) and 2019 (19/00233/OUT) both of which were refused. In total there were 266 objections to the 2019 application from residents, highlighting the concerns felt surrounding the delivery of housing in this location and strongly indicating the lack of community support for this allocation. There were also six reasons for refusal applied. Regarding landscape it is stated "By introducing development on this site the proposals would be detrimental to the landscape character of this area and the rural setting of Otterbourne and would detract from the enjoyment of the countryside from the public realm and public rights of way". The response from the Council's Landscape Officer confirmed: "...Despite the applicant's efforts to retain existing boundary vegetation, trees, woodland and hedgerows, the development by its very nature would have a significant negative effect on the countryside".

- 1.23 The proposal was also refused on highways grounds, and our own highway consultant has raised potential safety concerns resulting from the addition of a further arm off the Coles Mead roundabout required for access, which should have been fully assessed prior to submission.
- 1.24 As we have previously set out in response to Matter 5 OT01 was put forward as a potential allocation site by the PC, however as we have previously highlighted the PC's own consultation confirmed that of the 145 respondents 77% were against the allocation with only 16% in support. It is concerning that the results of this survey, do not reflect what has been put forward for allocation to WCC. The responses received to Barwood's own consultation undertaken in 2024 reflects the PC's, with residents again raising serious concerns with the allocation (see appendix 4 of Barwood's reps to the Reg. 19 Local Plan).

Appendix 4 – Otterbourne Parish Council's Consultation Results (taken from Parish Council Planning Minutes - 08/03/2022)

#### IMPLICATIONS FOR FUTURE PLANNING WITHIN OTTERBOURNE

#### RESPONSES RECEIVED FROM THE VILLAGE

The Parish Council delivered 621 newsletters with forms. 145 responses were received = 23% response rate overall.

Not all respondents scored a FOR or AGAINST for every site and some respondents just submitted comments.

SITE	'FOR'	'AGAINST'	Site name with potential number of dwellings in brackets
OT01	87	44	Land at 'Meadowside' and 'Dean Croft' on Poles Lane (36)
0T06	72	53	Land at 'Roselea' on Highbridge Road (41)
OT05	72	62	Land off Waterworks Road (24)
OT02	59	65	Highbridge Farm on Highbridge Rd (181)
OT08	53	79	Land west of Cranbourne Drive (99)
OT04	48	85	'Park Farm' on Kiln Lane (68)
OT03	23	112	Land east of Main Road (106)
OT09	14	119	Land off Kiln Lane (185)

Figure 1. Parish Council Consultation Responses

1.25 One of the key reasons the PC put its support behind OT01 is that the promotors agreed to a reduced developable area and to gift the remaining land to the PC to be retained as open space. We understand the PC therefore made a unilateral decision to disregard its own consultation. However, as we have highlighted there are serious questions regarding the ability of this land being capable of delivering the c. 55 dwellings allocated whilst retaining the promised area of public open space. The PC has confirmed in its response to the LP consultations they would not wish to allocate this site if the applicant was not able to gift this land.

- 1.26 In direct conflict to this, Gladman has indicated within its latest representations to the LP that it considers the site suitable to deliver a significantly higher capacity, considered appropriate based on the increased housing need set out in the updated SM. While we agree a higher housing figure should be sought for Otterbourne, OT01 is not considered to be a suitable size to accommodate the dwellings currently allocated without impeding on the land which the PC are so keen to protect, let alone meet a higher capacity.
- 1.27 Whilst we acknowledge the inspector has confirmed omission sites will not be covered through this Hearing Process, we would simply highlight that there are alternative options, which are deliverable and will meet the current SM need and can provide the much-needed affordable housing (such as Land off Cranbourne Drive see Barwood's reps to Reg 18 and 19 of the LP).
- 1.28 We do not believe Policy OT01 has been positively prepared or is robustly justified by evidence available. The housing need proposed for Otterbourne should be higher given the sustainable credentials of the settlement, the allocation proposed is not considered suitable to meet the capacity proposed, the windfall allowance is too high and not justified by appropriate evidence and the supply should not be including completions dating back to 2020 to bolster the housing numbers and suppress the amount of new land to be allocated. If OT01 is allocated, at the very least an additional site/s should also be allocated to meet the noted shortfall.
  - 2. Policy OT01 includes a phasing restriction. Would this be justified by evidence?
- 1.29 We do not consider that the current phasing restrictions set out in the LP and specifically regarding OT01 are appropriate, acutely more so now given the significant housing need we have highlighted in response to Matter 4. The current phasing approach will inevitably lead to issues in the short-term housing supply and housing delivery not being located in the most appropriate locations. This policy is considered unsound as it has not been positively prepared and could restrict the LPA from meeting its housing need, particularly regarding affordable housing. Further evidence should be required to justify this approach and ensure the LPA is not overly restricting the delivery of much needed homes.
  - 3. Would the policy as submitted, ensure the archaeology on the site is conserved appropriately?
- 1.30 As we have highlighted in our response towards Matter 5 the Site Allocation Methodology, we believe the lack of consideration towards this point has followed through the assessment since the initial review in the SHELAA.

1.31 Whilst we believe there are other significant constraints which will likely impede the delivery of the proposed capacity on this site and therefore the housing allocation should not be progressed, if OT01 remains as an allocation, the policy should at least include a requirement for an appropriate archaeological assessment prior to determination of any future application.

