

Examination of the Winchester District Local Plan 2020-2040 - Hearing Statement on behalf of Taylor Wimpey Strategic Land - ANON-AQTS-32TA-K Field Farm, Swanmore

Matter 2 – Spatial strategy and distribution of development Policies SP1, SP2, SP3, H1, H2, H3, and E1 and E2

Issue: Whether the spatial strategy and distribution of development is positively prepared, justified, effective and consistent with national policy.

- 1. The Settlement Hierarchy Review (2024) scores settlements and groups them which provides the settlement hierarchy in the District. Is the methodology used robust and the outcomes accurate? Is the distribution of development between the tiers of settlements justified and how has it been established?***

Overall, the District has the capacity to accommodate a greater number of dwellings than planned for to align with a higher housing requirement, as set out in our response to Matter 4, and the comments regarding housing distribution below should be read in that context.

As drafted, Policy H3 splits the 3,825 homes apportioned to the Market Towns and Rural Areas (MTRA) into commitments and new allocations spread across the settlement hierarchy, namely the five market towns, five larger rural settlements, five intermediate settlements, and the remaining rural area. The five larger rural settlements are Colden Common, Denmead, Kings Worthy, Swanmore and Wickham, with Swanmore moving up the hierarchy – we support this.

Policy H3 proposes new allocations of 610 homes to the five larger rural settlements. The table on page 389 of the Draft Plan states that each of these settlements were asked to identify new sites for 90-100 homes – at most this would add up to 500 new homes, not 610.

The 610 total proposed allocation figure is skewed because it includes an allocation of 200 dwellings at Knowle (Policy KN1 – Ravenswood). Knowle is a small settlement in the rural area of Wickham Parish, not at Wickham. This undermines the spatial strategy which bases housing distribution on the sustainability of settlements, not parishes. There is also uncertainty around the deliverability of KN1. Despite an application for 200 dwellings being submitted in June 2018 (ref. 18/01612/OUT), planning permission has yet to be granted. As such, there is no clear evidence that homes will be delivered at the site and it does not therefore meet the definition of deliverable within Annex 2 of the NPPF. It should not be relied upon to meet the housing needs of the larger rural settlements.

Of the remaining 410 dwellings, only 290 will deliver open market and affordable housing. This is because the 120 dwellings at two allocations in Kings Worthy (KW1 and KW2) are for older persons housing. No new allocations are proposed at Swanmore despite it being one of the five larger rural settlements.

We submit that the Plan should be amended so that its allocations better reflect its spatial strategy. The 200 home allocation at Knowle should be deducted from the larger rural settlements total, leaving 410 dwellings. To help address this shortfall, we suggest that a new greenfield allocation of land for 225 homes at my client's site 'Land at Field Farm, Swanmore' (ref. SWA10) is included in the Plan.

As set out in our Regulation 19 representations, site SWA10 scored equivalent to, or better than the other five sites considered for allocation in Swanmore within the Integrated Impact Assessment (IIA). SWA10 offers the opportunity to provide high quality open market and affordable housing on a site which has no significant

constraints and lies adjacent to the settlement policy boundary. As such, it should be allocated for development to help address the imbalanced distribution of housing across the settlement hierarchy to help meet the higher overall housing requirement.

2. *Is the spatial strategy and settlement hierarchy as set out in Strategic policy SP2 justified as an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence?*

Taylor Wimpey Strategic Land (TWSL) support the principle of the Draft Plan's spatial strategy for distributing housing across a hierarchy of settlements based on their relative sustainability. However, the Plan fails to achieve that for the reasons set out below.

The distribution proposed in the Draft Plan is unevenly weighted in favour of focusing the majority of new development in urban areas. This includes large brownfield sites in central Winchester which are likely to be slow to come forward and offer reduced levels of affordable housing. Of the 15,115 dwelling suggested requirement (which we contend should be substantially higher), 11,290 (75%) are either in Winchester Town (5,640) or in the South Hampshire Urban Areas (Newlands, West of Waterlooville and Whiteley) (5,650). That leaves just 4,250 (25%) to be accommodated in the Market Towns and Rural Area (MTRA) which, as set out in the table contained in Policy H3, comprises 12 settlements along with the remaining Rural Area. This pattern of development is likely to lead to a growing concentration of services in the existing, larger, urban areas to the detriment of investment in the settlements across the rest of the District (the MTRA). Over time, this will lead to negative impacts on the vitality and viability of the MTRA with associated detriment to the quality of life of those living there both now, and in the future, contrary to the 'Living Well' objective of the Draft Plan which seeks to "Deliver inclusive communities with a range of services and infrastructure".

This pattern of growth is also unsustainable because the likely gradual degradation of rural services will lead to a high number of people travelling to the larger urban areas to access services and facilities. This will give rise to an increase in the number of vehicles on the road with associated localized effects on air quality, ground water quality and ecology. It will also lead to less socially cohesive communities, as people will be less likely to venture out if there are reduced services to access.

An increase in the housing requirement of the MTRA's as a result of increasing the Plan period, accounting for unmet needs and a suitable buffer, would lead to far more sustainable pattern of development across the District and provide the population to support existing and future services in the less urban / rural locations. It is therefore essential to allocate a greater number of sites within the MTRA to even up the balance.

3. *Is the proposed distribution of housing and other development supported by the evidence in the SHELAA, settlement hierarchy, and IIA, and will it lead to an appropriate pattern of housing and economic growth?*

No, the proposed distribution of housing fails to recognise opportunities for the allocation of suitable sites in the Market Towns and Rural Areas to meet the housing needs of the district and help sustain the vitality and viability of the rural settlements.

Swanmore is identified as a larger rural settlement within the Settlement Hierarchy Review (SHR) 2024. This correctly recognises that the level of services and facilities on offer within the settlement and confirms that it represents a sustainable location for new development. This includes a primary school, secondary school, large commercial and employment area, daily bus service, post office, public houses, church, recreational facilities including children's play equipment, hairdresser and convenience store.

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'.

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.

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.

However, we do not agree that the settlement gap has been appropriately considered, for the reasons set out below.

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.

My client's 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 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.

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).

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:

- 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."

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.

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.

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.

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.

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 development.

Site SWA10 scored equivalent to, or better than the other five sites considered for allocation in Swanmore within the Integrated Impact Assessment (IIA). SWA10 offers the opportunity to provide high quality open market and affordable housing on a site which has no significant constraints and lies adjacent to the settlement policy boundary. As such, it should be allocated for development to help address the imbalanced distribution of housing across the District and the higher overall housing requirement.