



WINCHESTER CITY COUNCIL LOCAL PLAN EXAMINATION - STAGE 1 HEARINGS

MATTER 5: SITE ALLOCATION METHODOLOGY

Grass Roots Planning on behalf of Barwood Land

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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 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 consultation.
- 1.2 We have set out our representations within the earlier consultation stages to the LP and these represent our position on the plan and its constituent parts, however this statement seeks to elaborate on the issues and concerns previously raised and also respond to the Inspector's Matters, Issues and Questions (MIQs) set out in the Inspector Note 2 V2 (ED13).
- 1.3 This statement relates to Matter 5 which refers to the Site Allocation Methodology

Issue: Whether the site allocation methodology for proposed housing, mixed-use and non-residential site allocations is justified, effective and consistent with national policy?

1. How have the proposed allocations been identified?

- 1.4 Those allocations which were not brought forward from the previous Local Plan (LP), look to have been initially identified using the Strategic Housing and Employment Land Availability Assessment (SHELAA) 2021 (updated in 2023) as a starting point. As set out in para 5.5 of the Development Strategy and Site Selection report (July 2024) discussions were then held with the Town and Parish Councils who were tasked on deciding the most appropriate allocations to take forward based on the evidence available.
- 1.5 Considering Otterbourne specifically, the Development Strategy and Site Selection report states that those SHELAA sites located against the settlement boundary were then reviewed through the Integrated Impact Assessment (IIA) which forms part of the Sustainability Appraisal (SA); suggesting this informed the site selection, however it is unclear from the evidence available if the IIA appraisal informed the Parish Council (PC) assessments as they look to have consulted on each of the 8 sites (including those not directly adjacent the settlement boundary).

- 1.6 Regardless of this point, through our representations to the Reg. 18 and 19 consultations we have raised numerous concerns / inconsistencies between how sites have been assessed through both the SHELAA and IIA which we believe has significantly compromised the robustness of the evidence behind the sites progressed. Indeed, whilst we have highlighted these issues through both the Reg. 18 and 19 consultations, these concerns remain unaddressed. Whilst certain oversights are clearly going to take place during the course of producing a LP, it is the number of issues flagged, and the disregard for addressing these issues to fast-track to examination, which is most concerning.
- 1.7 The general method of utilising the SHELAA as the starting place and interrogating the sites further through the IIA on the face of it is considered a reasonably robust approach. However, the method of assessment also needs to be robust and applied consistently; and as noted it is unclear as to whether the IIA process actually informed PC discussions.
- 1.8 Without addressing mistakes in the evidence base, these issues have continued to feed into decision making on the site selection process. To give a clear example of this (as raised under both the Reg. 18 and 19 consultations), if we take two comparison sites in the settlement of Otterbourne - Land off Main Road (OT03 in the SHELAA) and Land off Cranbourne Drive (OT08 in the SHELAA), there are clearly questions regarding how these have been assessed and why the conclusions vary as they do - in particular with regard to landscape and heritage impact.
- 1.9 As shown on page 14 of the SHELAA Otterbourne Proforma - OT08 was assessed as “amber” regarding potential landscape impact when this site is clearly both physically and visually contained and notably a submitted planning application - 25/00159/OUT – has attracted no landscape objection. In contrast OT03 (page 6), a site where there have already been two planning applications refused on landscape grounds was recorded “green”. It is clear OT03 would have a significantly higher impact in landscape terms than OT08, particularly given the potential impact on views (adverse effects on receptors of higher sensitivity) available from people walking the well-used PRoW crossing through the site.
- 1.10 Considering heritage and archaeology again, OT03 (OT01) was recorded green for both constraints despite the fact there are various listed buildings within close proximity and the route of a Roman Road directly bisects the site. It is considered unjustifiable to conclude from a high-level assessment that there would be no potential heritage constraints to development.
- 1.11 Following comments made at the Reg 18 stage, the SHELAA was apparently updated in 2023, but none of these points were considered in the update. Indeed, this remained the same assessment and summary as previously set out, leading us to question whether a full review actually took place, as it would appear not.

- 1.12 Through our representations we have raised notable concerns on the validity of this assessment process and the robustness of the data which has underpinned the initial assessment of sites which does not appear to have been reviewed despite the concerns raised. We have also raised this issue in response to Matter 1, as we believe it clearly shows WCC has not progressed in compliance with the statutory procedures as consultation responses have been ignored to fast track the LP to examination.
- 1.13 The next stage in the site selection process included the IIA (2022/2024) with a more detailed appraisal of SHELAA sites considered deliverable / developable. However, again solely looking at Otterbourne and the comparison of sites OT03 and OT08, the inconsistencies regarding landscape and heritage have followed. OT08 is considered more constrained from both a landscape and heritage perspective, when this very clearly should not be the case. In fact, regarding heritage the OT03 justification is simply that it was rated “green” for effects on heritage assets in the SHELAA. This is not a strong justification, or clear evidence to suitably test alternative sites. OT03 which WCC has assessed as having no potential landscape impact could in fact have the potential to significantly impact the landscape character and rural setting of the village (as evidenced by the Council’s own landscape officer in their response to the previous refused planning applications). This point has been reiterated by our own supporting landscape consultants Tyler Grange who, on conducting a Comparative Landscape and Visual Analysis of those SHELAA sites in Otterbourne, could find no reasons why sites OT03 and OT04 were assessed as being preferable to OT08 in landscape terms.
- 1.14 Indeed, the Council’s later Development Strategy and Site Selection report, which includes initial technical appraisals of the chosen options, highlights OT03 could have a high impact on visual sensitivity and a medium impact on both landscape character sensitivity and value. It is considered that this level of assessment should have informed an earlier stage in the assessment process in order to consider alternatives more robustly.
- 1.15 Relevant Town and Parish Councils were provided with this evidence and asked to conclude on the most appropriate allocation to put forward. Essentially it is considered that for Otterbourne (and likely numerous other settlements based on the representations reviewed) the PC in deciding on the most appropriate allocation had incorrect evidence to inform its decision. Regardless of this, the PC put the 8 SHELAA sites out for consultation and following discussions with some of the landowners / promoters, did nominate site OT03 which is now draft allocation for Otterbourne OT01.
- 1.16 The Development Strategy and Site Selection report suggests the PC considered four potential sites OT03, OT04, OT05 and OT08 and undertook public consultation on these, however it is clear from the PC consultation (See appendix 3 of Barwood’s Reg.19

consultation response), that all 8 sites were considered, with the results raising questions as to what point it was decided to progress with site OT03 as the proposed allocation, given this was not the favoured option in the scores of both the village residents and indeed the PC.

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)
OT06	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. Annex B Planning Minutes 08/03/2022

- 1.17 As set out in figure 9 of Barwood's representations to the Reg 18 and 19 LP, OT08 was scored 5th by residents of the village and 2nd by the PC. In comparison OT03 was scored 7th by residents and 3rd by the PC, highlighting of the two sites in the settlement OT08 should have been progressed as the preferred option if based on local opinion.
- 1.18 In putting forward OT03, it is also clear in its response that the PC were still open to other options for development in the village. The response acknowledged that the PC had three meetings with landowners of those SHELAA sites and a fourth was arranged (with Barwood). However, this is within the same response as the allocation put forward, clearly suggesting the appropriate assessment of alternative sites had yet to be made before the decision was issued.
- 1.19 We are concerned that the allocation put forward was rushed through to meet the WCC's strict deadline to progress the plan based on the 2023 Framework, rather than considering the evidence or detail to select the most appropriate choice for the village. They then go on to state they would also appreciate further consultation with WCC; however, we are aware through meeting with the PC, that no further consultation took place. This again suggests that site OT03 was progressed without an appropriate consideration of the reasonable alternatives (please refer to para's 3.23 to 3.36 of Barwoods representations to the Reg 18 LP for further information in this regard).
- 1.20 The Development Strategy and Site Selection report, looks to provide a justification behind why sites such as OT01 were preferable, but it is difficult to understand why this justification applies in support of the chosen allocation and not those omission sites, particularly regarding matters such as highways impacts, access, landscape etc.

- 1.21 The appraisal acknowledges that a non-negotiable caveat to the promotion of site OT03 is that only part of the site is to be developed, and the remainder is gifted to the PC as public open space under a S106 agreement. The report also states the PC considered it important to open discussions on the remaining sites if the S106 agreement to secure the 7 acres of open space was not forthcoming, as without that they would not then support development on site OT03.
- 1.22 As discussed, it is difficult to understand whether the IIA informed the site selection process, however again reviewing this assessment there are obvious mistakes which will have impacted the sites consideration. For example, IIA Objective 1, incorrectly records OT03 as being with 400 metres of a primary school, this is not the case, the distance is clearly over 500 metres and requires crossing Main Road, adding further potential safety and/or traffic implications and making the walking route to school less attractive. OT08 is also considered to be minor negative, despite the fact it is both within 400 metres of a primary school and within 501-1000m of a secondary school which should be considered of significant benefits in terms of sustainability. Whilst these look like minor errors in the context of a wider plan, this highlights inherent problems with the technical evidence base.
- 1.23 As highlighted there have been a multitude of mistakes made through the site assessment process, which we have consistently raised (as have other consultees) but have never been addressed. Our concerns are only based on a detailed review of two sites, given the level of criticism raised regarding the site assessment process we would conclude these issues have occurred across the board and thus this does not make a solid evidence base on which to test alternative sites.

2. Do they accord with the Plan's spatial strategy as set out in strategic policies SP1, SP2, SP3 and H1, H2, H3 and E1-E3, in terms of the overall provision throughout the District?

- 1.24 Whilst the sites allocated look to generally follow the overall spatial approach set out in the LP, we do not consider this to be the most appropriate growth strategy for the district, and further allocations should be directed toward those smaller settlements in order to sustain these and deliver the much needed affordable housing in these locations.

3. How were the site boundaries, areas and dwelling/other capacities determined? Are the assumptions justified and based on robust evidence? In particular, are the indicative residential capacities, set out in the Plan's site allocations justified by the evidence and consistent with NPPF paragraphs 123 to 126?

- 1.25 Referring specifically to allocation OT01, we have on several occasions raised significant concerns regarding the deliverability of the 55 dwellings within the land allocated for development, understanding that most of the wider site will be required to be retained as open space. In acknowledging our concerns no further justification has been provided as to why this capacity is considered appropriate. It is also the case as raised in response to Matter 1 that Barwoods representations were also missed off the Reg. 18 consultation summaries for policy OT01, raising concern that they have not been adequately considered by the Council (see appendix 2 of Barwoods Reg. 19 LP reps).
- 1.26 The area of land contained within the surrounding trees is just 1.69 hectares and when considering the constraints (including an area of woodland and trees surrounding the site covered by a TPO, alongside the infrastructure required to deliver the site (i.e. attenuation ponds, roads, play area), we consider the area suitable to deliver no more than 30 dwellings.
- 1.27 As demonstrated in Figure 11 below, Gladman's own planning application in 2019 considered the developable area of this parcel to be nearer 1.1 ha, with a capacity of 55 dwellings this would lead to a very dense development of circa 50 dph, more akin to a city centre scheme than a development located on the rural fringe of a village. Are the Council suggesting a dph of 50 is suitable for this location?

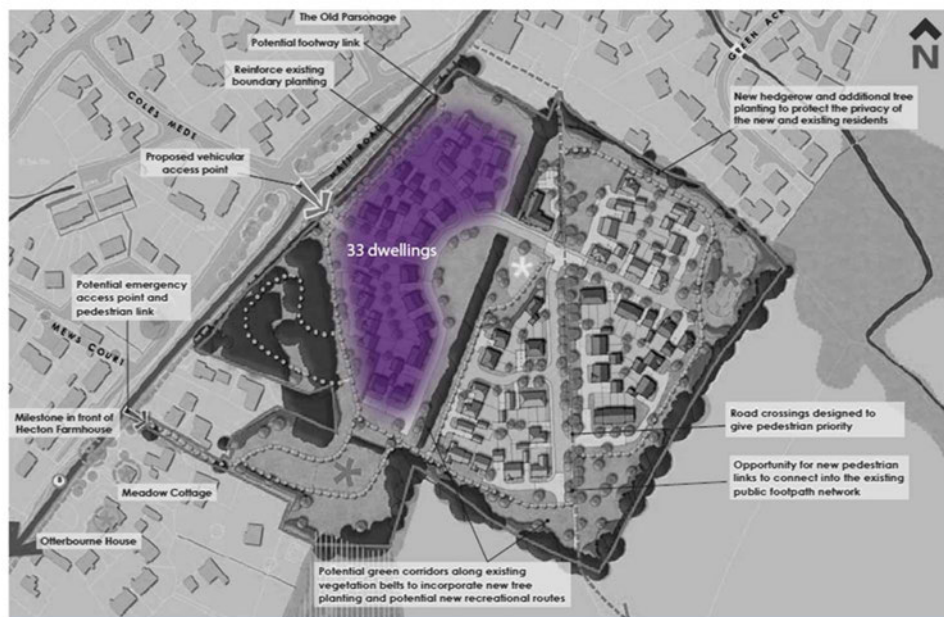


Figure 11. Gladman Masterplan from 2019 application, including shading and numbers inserted over.

- 1.28 The supporting text to Policy OT01 states “*The site at Otterbourne consists of an area of land that measures about 6.4 hectares with about 2.8 hectares of open space and about 3.5 hectares of developable area*” (para 14.153). This should raise alarm bells to the PC given the area of land they believe to be developable is just that parcel which equates to 1.69 hectares. Indeed, there would no doubt be significant ecological concerns in removing the woodland

area, which is required to be retained under the policy and was also required to be retained under the previous planning applications.

- 1.29 The area of land which is apparently to be gifted to the Council, is well-used, publicly accessible land and development here would impact on the currently unspoilt views from the public footpath. Indeed, moving the footpath adjacent to the treeline which would border the new development would significantly impact the view of surrounding open space. There is also no strong defensible boundary in this location which could also in turn lead to further development creep into the countryside. The PC requested in their representations to the Reg. 18 consultation that the settlement boundary be extended to include only the developable part of the site, which has been done; however Gladman's own response to the Reg. 19 consultation, highlights they will more than likely be looking to achieve a higher density scheme which would have to take up further land north of the path encroaching on the land which the PC are so keen to protect.

"However, noting the potential increase in housing requirement in the near future within Winchester. Gladman suggest that the site is capable of accommodating in excess of the 55 dwellings proposed whilst retaining land beyond the PROW through the site and significant elements of open space. We are requesting a change to the plan in terms of increased flexibility in terms of the final masterplan for the development of the site".

- 1.30 As the PC have confirmed they would not support the allocation without ensuring the land beyond the PROW is gifted to them, and only land up to this point developed; the above response should raise further questions as to the suitability overall of this allocation.

4. How would the proposed allocations provide flexibility in the event that some sites do not come forward? The Council is requested to address the above questions 1-4 in general terms in relation to the proposed allocations.

- 1.31 As we have set out in our response to Matter 2 and 4, there needs to be a far greater allowance / flexibility to deal with potential issues such as non-deliverability. We have also clearly highlighted concerns regarding the allocation of site OT01 which is not considered suitable to deliver the capacity required. The PC has confirmed that if they were not able to deliver the capacity within the land south of the PROW and gift the remaining land for open space, they would not support this allocation. This clearly shows the capacity on this site should be reduced and either an additional allocation should be made in Otterbourne or a larger allocation should be progressed. If this is not done, a reserve allocation should be identified in case this site does not come forward.

5. In addition, for each site allocation the Council should provide evidence to justify their delivery within the Plan period.

- 1.32 Yes, WCC should provide evidence to justify the deliverability (within the Plan period) of all sites within the trajectory.

6. The Council has set out tables relating to housing supply in each of the settlements within the spatial areas in the 'Development Allocations' section of the Plan. In relation to each spatial area, the Council should provide robust evidence to justify the number of dwellings anticipated to be delivered in the Plan period, including net completions, outstanding permissions, windfall allowance, and development equivalents, Neighbourhood Plan allocations, extant Plan existing commitments, and new site allocations.

- 1.33 Yes, we agree the Council should be providing a more robust analysis to justify the sites proposed to meet the acknowledged need in the various spatial areas. As highlighted, we do however believe this will clearly fall significantly below the actual need for these areas, as the windfall has often been over inflated, and we do not believe the Council should be including permissions from 2020 to inform the plan going forward. This again highlights that additional sites should be allocated to meet the acknowledged housing need under both the 2023 SM and dramatically so under the 2024 SM.



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