

Examination of the Winchester District Local Plan 2020 - 2040

Matter 8 Hearing Statement: Matter 8 Development Allocations the Market Towns and Rural Areas (MTRAs)

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

Policy CC2 Colden Common Farm

On behalf of Foreman Homes Limited and VIVID



MASTER

LAND & PLANNING

Policy CC2 Colden Common Farm

1. Would the phasing of development until 2030 be justified by the evidence?

1. Foreman Homes Limited (FHL) have secured a contracted position on the proposed Policy CC2 allocation. FHL wish to bring forward this site to a planning application and thereafter housing delivery at the earliest possible opportunity. FHL will be delivering the site in partnership with VIVID, the fifth largest developer of new homes amongst housing associations in England, having built over 1,500 in 2023/24. The partnership with VIVID ensures that this proposed allocation can deliver affordable housing at a time when registered providers are withdrawing from the market for S106 properties¹.
2. Appendix A of the Housing Topic Paper Update (ED02) identifies that CC2 would deliver 20 units in 2032/33 and 25 units in 2033/34. This trajectory has not been informed by any positive dialog by the Council with FHL. Foreman Homes aspire to bring forward the site according to the following illustrative trajectory:
 - Planning application submission Q4 2025
 - Commencement on site within 6-months of the final approval of conditions / reserved matters
 - Delivery trajectory of 1 unit per week from first completion
3. FHL made representations to the Regulation 19 consultation to confirm Policy CC2 is available, suitable and deliverable. FHL strongly object to the phasing restrictions in Policy H2, reiterated in Policy CC2.
4. The only allocation within Colden Common that is not subject to the 2030 phasing is Clayfield Park (Policy CC1). This allocation has been carried over from the Winchester District Local Plan Part 2 – Development Management and Site Allocations (LPP2) which was adopted in 2017. Existing commercial uses on the site as well the potential for the requirement for remedial measures as a result of current uses and historic use of the Clayfield site as a brick works mean that this isn't a straightforward site to bring forward for development and yet it is included in the Council's five-year housing land supply with development anticipated to commence in 2027/28. As of March 2025, no planning application has been made. No evidence has been provided to demonstrate why this site, which has benefited from an allocation since 2017, is now considered deliverable in the first five years of the plan. For this reason, Policy CC2 should not be restricted, whereby unavailable land, albeit previously developed, is preferred. Local needs, including demonstrable needs for affordable housing, at Colden Common and

¹ Various factors are affecting reduced uptake from registered providers towards acquisition of S106 schemes including low levels of interest cover; greater capital expenditure to retrofit existing stock to ensure compliance with building safety standards (fire safety); retrofitting to address damp and mould hazards; limits of rents charged.

surrounding settlements would not be met until 2031 at the earliest (see Appendix A of ED02).

5. More generally, the phasing restrictions are inconsistent with the Framework and the Written Ministerial Statement of July 2024.
6. Paragraph 6.6 onwards of ED02 rightly considers the implications of the latest Framework. While the Local Plan is examined under the December 2023 Framework, the transitional provisions under paragraph 236 of the December 2024 are engaged (by reference to 234(b)).
7. The proposed housing requirement for the emerging Local Plan of 15,465 dwellings (773dpa) would meet 67% of local housing needs of 1157dpa (calculated using the standard method published 12 December 2024). The consequence is that *"the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need."*
8. In adopting this Local Plan, there would be a demonstrable shortfall for plan-making purposes under paragraph 234(b). There are also implications for decision making as set out in paragraph 78(c). A 20% buffer would be required from 1 July 2026.
9. The data at Appendix B of ED02 does not relate to decision-taking as set out in Table 6, which is important to assess the realities of the December 2024 Framework. Instead, Appendix B supports Table 5. The graph at Appendix C is unsupported by the underpinning assumptions on *'without phasing'* and which sites are affected and when these are envisaged to be delivered.
10. Paragraph 6.10 of ED02 accepts higher housing requirements are inevitable; however it does not go on to consider how any earlier permitting of the phased H2 sites would ultimately count towards meeting those increased requirements.
11. Consequently, there is no sound reason to delay any planning application being made, and homes being delivered, through the phasing restrictions defined in Policy H2 and CC2.
12. The phasing restrictions in CC2(i) do not reflect the wording of H2, which allows for permissions on sites where *"...they are needed to overcome a district level housing land supply shortfall or would deliver housing which is demonstrated to be in priority need in the locality at the time"*. Nonetheless, the inclusion of this exception in H2 is insufficient to overcome our client's objections to Policy H2. This approach is not positively prepared with no clarification on what is meant by *"needed to overcome"* and *"priority need"*. A site alone may not in itself *"overcome"* any shortfall, however it most likely to contribute cumulatively.

2. Policy CC2 ii requires a site plan. What is meant by this and would it be effective in controlling any impacts on the listed buildings and ensuring suitable access by motorised and active forms of travel?

13. The phasing restrictions in CC2(i) do not reflect the wording of H2, which allows for permissions on sites where “...they are needed to overcome a district level housing land supply shortfall or would deliver housing which is demonstrated to be in priority need in the locality at the time”. Nonetheless, the inclusion of this exception in H2 is insufficient to overcome our client’s objections to Policy H2. This approach is not positively prepared with no clarification on what is meant by “needed to overcome” and “priority need”. A site alone may not in itself “overcome” any shortfall, however it most likely to contribute cumulatively.
14. FHL would expect to provide a site plan / masterplan at planning application stage. This will be informed by the necessary assessment of constraints and opportunities, with the analysis of the site context in accordance with the National Design Guide.

3. Would the proposed development have an acceptable relationship with the SDNP and would policy requirements ensure that its landscape and scenic beauty would be conserved and enhanced? Given site constraints, including the listed buildings and SDNP, would the indicative site capacity be justified by the evidence?

SDNP

15. The SDNPA do not object to the allocation of CC2. The site does not abut the SDNP, which is to the east of Sandyfields Lane estate. Inclusion of the SDNP designation on the proposals map would be helpful.
16. In terms of CC2(viii), the assessment of the visual affects on the SDNP can be addressed by FHL through proportionate landscape evidence prepared to support their emerging proposals and evidenced at the time of the planning application.

Listed Buildings

17. PM120 proposes to amend Policy CC2 in response to Historic England representations:

Land at Colden Common Farm, as shown on the Policies Map, is allocated for up to ~~about~~ 45 dwellings. Planning permission will be granted provided that details accord with the Development Plan and meet the following specific requirements:

18. There has been no prior consultation on this modification and FHL object to this change.
19. While it is noted that the modification is in response to the quantum being consistent with paragraph 4.9 of the Heritage Topic Paper (SD10f), that

document is not supported by any site plan or detailed scheme to inform a maximum being defined. The emerging Local Plan must be positively prepared and the reference to 'about' or 'approximately' would be appropriate having regard to the heritage evidence underpinning the plan. This evidence defines the appropriate yield for each site for policy-making purposes, which should not exceed 45 dwellings. The outcome at the development management stage is ultimately reserved following due consideration of all relevant evidence, of which the setting of the listed building is one (but very important 'great weight') consideration.