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Dear Sir,

Response of CPRE Hampshire to the Your Plan Your Place (YPYP) Consultation on preparation of a Winchester District Local Plan 2018-38 (excluding the South Downs National Park (SDNP))

We welcome the opportunity to contribute to this consultation. This is the letter referred to in the online survey response submitted on behalf of CPRE Hampshire.

Vision

The consultation asks whether the Vision as set out in the 2013 Joint Core Strategy is still relevant. CPRE Hampshire's (CPREH) response is **No** for the reasons set out below.

The vision was drafted some years ago. It had as its focus housing, tourism and employment. 'live, visit, work and do business'. The document states that "the key change and challenge for the new Local Plan is that it needs to be prepared through the climate change lens and reflect the need to zero carbon sustainable development going forward." CPREH applauds WCC's aspiration to prepare the plan through the "lens" of climate change, and shares this aspiration, but this will necessitate changes in the existing vision, and substantial changes to the historical spatial pattern of development, particularly if the ambitious target of carbon neutrality by 2030 is to be met.

The challenges facing the District are significantly different today. Winchester City Centre is experiencing major changes to retail shopping patterns which will be exacerbated by the impact of Covid. It will also be affected by increased permitted development rights and WCC's commitment to climate change. The current vision does not mention that Winchester is the most sustainable location in the district. Since the impact of Class E (Commercial) to Class C3 (Residential) changes has not yet been evaluated, nor has the move towards different shopping habits, these changes would need to be accommodated in a new vision.

In addition, the previous vision's second point refers to "creating extended communities in South Hampshire", an objective which must now be revisited as these are car-dependant locations and would surely not meet the "lens" test.



The vision will need to articulate how any growth in the market towns must look at options for mixing work and living in order to minimise additional car journeys to the major centres such as Winchester.

CPREH considers that a fresh vision is needed to guide the new local plan and reflecting the new challenges which the Council faces as the local planning authority. The purpose of the planning system is to deliver sustainable development and land use planning which embraces environmental, social and economic issues, as set out in the NPPF. In that context the vision should have as its starting point the delivery of sustainable development which would be consistent with the NPPF.

The delivery of sustainable development should apply across the whole of the District and in that context there is probably no need to identify 3 specific geographic areas as the current vision does.

Sustainable Development

The YPYP consultation document asks if one agrees with the sustainable development objectives set out in the table on page 12 along with three subsidiary questions for each. CPREH notes that the relationship between the 22 objectives presented and those (14 in total) included within the Local Plan Integrated Impact Assessment Scoping Report (July 2020) is not explained, which presents a confusing picture. The 22 objectives have 3 alternative responses, “Agree”, “Agree that the objective reflects the key issues that are facing the district” and “Agree that the objective supports the fundamental aim of the Local Plan to achieve carbon neutrality”, which CPREH suggests is rather leading and limiting. One may not agree with those three options, but would wish to comment, or suggest other objectives that may have been missed. It would certainly be easier if the objectives were numbered or labelled. It is not clear if they are of equal importance or are ranked in any manner. So, rather than respond to the specific questions asked, CPREH would make the following observations.

The objectives should be drafted such that they provide a robust framework for assessing the local plan and the detailed policies and proposals. In particular they should enable the Council to undertake its assessment of how the local plan will deliver the overarching objective ie: carbon neutrality as currently set out or delivering sustainable development.

CPREH considers that the over-arching objective for the local plan should be the delivery of sustainable development which could encompass the reduction in carbon emissions, but also the other key components of sustainable development and land-use planning i.e.; strong and competitive economy, meeting housing needs, supporting the community’s health, social and cultural well-being, protecting and enhancing the natural environment.



At present the options provided later in the consultation in Issue 4 *Homes for All* do not appear to have been judged against either these 22 objectives or those set out in the Integrated Impact Assessment Scoping Report.

Notwithstanding our comments above, we feel it important to point out some issues on the objectives as follows.

- Critically there is no objective which requires making more effective use of land, specifically brownfield land as set out in the NPPF 2019 Chapter 11
- There is no objective which mentions landscape, or ecosystem services that are provided by the countryside.
- Habitat connectivity has been omitted from the point on biodiversity.
- Settlement gaps should be protected, and coalescence prevented
- Living over the shop and the new role of the high street should be incorporated into the objective on high streets.
- There is no mention of affordable housing, or social housing.
- The transport objective fails to highlight the importance of mass public transit hubs, particularly the rail network, as being a significant way of minimising car travel.
- An objective on reducing the embodied carbon costs of new buildings and roads could usefully be incorporated.

CPREH is campaigning for a South Hampshire Green Belt. PFSH has supported the principle of a Green Belt and the case for such a designation is included within its work stream on its Joint Strategy. The protection of the integrity of the settlement pattern in South Hampshire, including that part within Winchester District should be a key objective. The new local plan should include policies which retain the character and setting of the towns and villages in the District and to designate a Green Belt. CPREH believes this should be incorporated either in the Vision or the Objectives.

These matters are discussed further below

Carbon Neutrality

CPREH congratulates WCC on the ambitious target to become carbon neutral by 2030. We are aware that Client Earth have written to the council to remind them of the legal obligations to address climate change and this objective clearly is in line with that requirement. We look forward to seeing the details of how the council will address climate change in the plan. In particular we would like to see clarity on detailed objectives and recognition of the need to measure progress against the objectives. Hampshire County Council have set out a very detailed plan with objectives on climate change and this may help WCC when they are drawing up their own detailed plans.

Ensuring new development is sustainable in terms of location and design will be central to achieving carbon neutrality. This is addressed above and below.

All policies, plans and decisions need to be measured against the objectives of the Climate Change Act 2008. The RTPI have studied this in their January 2021 report *'NET ZERO TRANSPORT - The role of spatial planning and place-based solutions'*. They say: "The planning system should also prioritise urban renewal that enables growth while achieving a substantial reduction in travel demand".

It might also help to see the outcome of a study carried out by Cool Climate at the University of Berkeley to demonstrate the most substantive action local authorities can take to minimise greenhouse gases. Although it used US cities for the study, the principles would apply just as much to Winchester, and showed the single most effective measure is to increase urban infill in preference to car-based development.

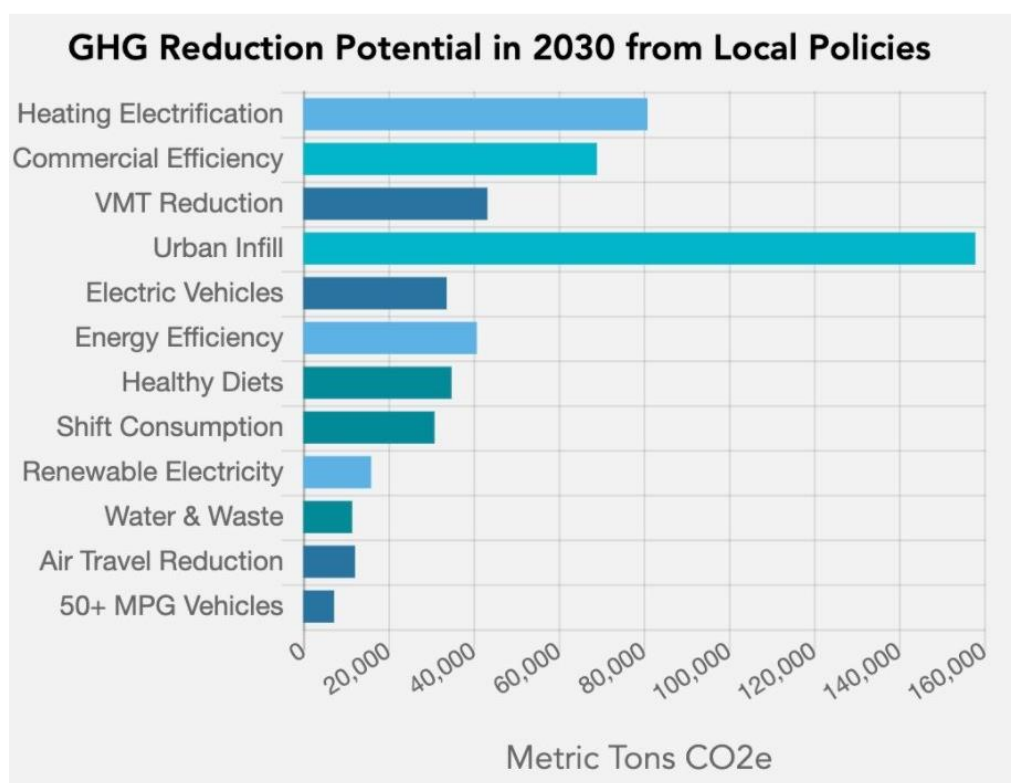


Figure 10: Cool Climate Network, 2018

Demanding standards will be needed for all development, new and retrofitting, in terms of energy efficiency, low carbon technologies, sustainable design and construction, and low carbon materials. Proposals for major development will need to include a formal assessment to demonstrate how these standards will be met and carbon dioxide emissions will be minimised.

Natural Environment

A New Green Belt

South Hampshire has experienced massive development over the last 60 years and has become an ever-expanding urban area. This ever-expanding growth was managed by the local planning authorities under the umbrella of structure plans prepared by Hampshire County Council and for a short period the South East Regional Plan. However, since 2011 there has been no formal strategic framework to guide decisions on where development should and should not take place, apart from non-statutory and non-examined position statements from PUSH Partnership for Urban South Hampshire (now PfSH).

The absence of such a framework, tested against sustainability objectives through a public examination, together with the pressure for more development means that the countryside of South Hampshire, which is one of its greatest assets and which helps define the identity of the towns and villages within it, is at risk from unplanned and un-coordinated development. CPRE argues that a new Green Belt, meeting the five purposes as set out by the NPPF, should be introduced within the local authority boundaries of Winchester, Test Valley, Eastleigh, and Fareham to contribute to more sustainable and controlled development of the area. A more detailed argument is set out in the attached '*Case for a South Hampshire Green Belt*' which shows our 'area of search' (below) reaching into the southern parishes of Winchester District.





CPRE Hampshire's view, having considered the requirements set out in the NPPF and its subsequent updates is that there is a strong justification for the designation of a new Green Belt in Winchester District, as part of the PUSH Strategy for Green Infrastructure.

PfSH Position

CPRE Hampshire presented proposals for a South Hampshire Green Belt to PUSH (now PfSH) Joint Committee on 5th June 2018. They were discussed in depth with many Members speaking in favour and highlighting the significant risks of not introducing a Green Belt.

It was resolved that the Joint Committee unanimously agreed that 'the PUSH Planning Officers Group should bring a full report back to the Joint Committee, in light of the presentation by CPRE, to advise whether there is any justification for considering a Green Belt across the PUSH area.'

Many of the PUSH Joint Committee Members spoke of the responsibility put on them by their public to explore our proposals for a new Green Belt. Green Belt is largely popular policy, demonstrated by our petition that has over 15,300 signatures, hundreds of which are from Winchester residents, and an increase of 500 in just the last month in response to the YPYP consultation.

Our attached '*Planning for a South Hampshire Green Belt*' document seeks to inform discussion on the merits of establishing a Green Belt in South Hampshire and answers some of the issues raised during the PUSH Joint Committee's deliberations.

Also attached is a report commissioned by CPREH and presented to PUSH, by West Waddy Planning Consultants '*An Assessment of the Effectiveness of Settlement Gap Policies in South Hampshire in preventing Urban Sprawl & the Coalescence of Settlements*' which demonstrates the failure of the gaps policies across several local authorities in South Hampshire. The consultants reviewed the implementation of the current local plan policies which seek to protect the settlement character and to avoid the coalescence of settlements through the use of designations, primarily local gaps. This included appeal decisions and decisions of the local planning authorities. The study concluded that the current policies which seek to protect the gaps between settlements are failing in their objective to prevent coalescence and sprawl. CPREH believes that the only policy mechanism which has sufficient strength and longevity to prevent coalescence is a Green Belt.



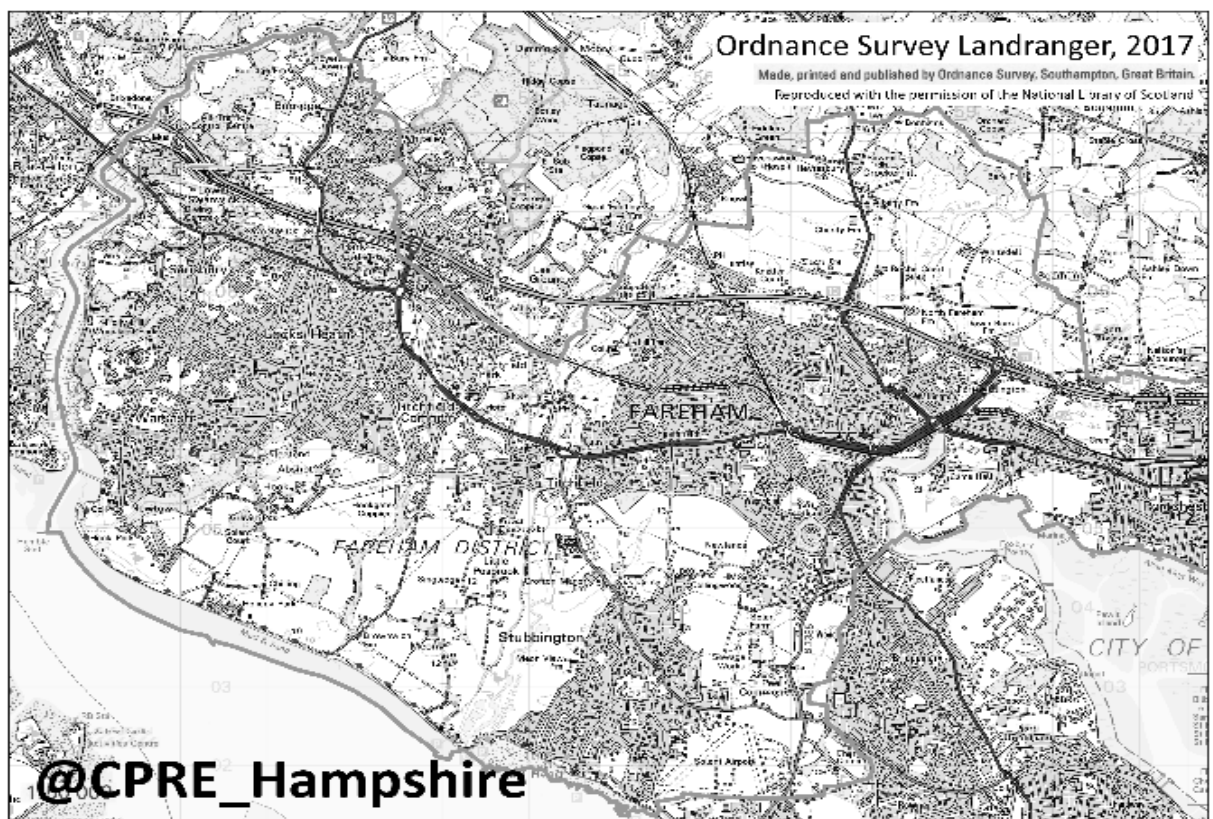
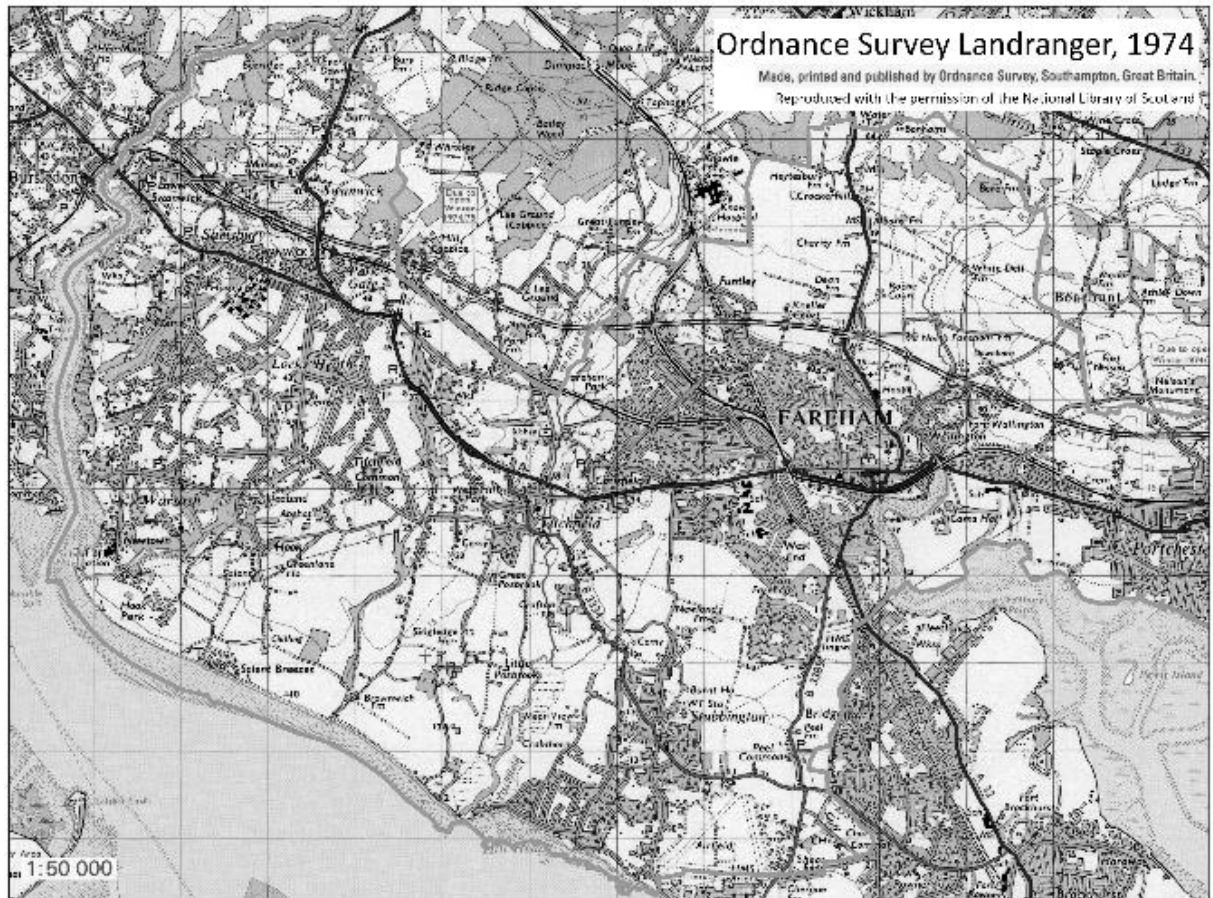
Why in Winchester District?

In summary, the NPPF 2019 states the purposes for having a Green Belt in Paragraph 134 and we believe the southern parishes of Winchester District are applicable and would clearly benefit in the following ways:

- a) to check the unrestricted sprawl of urban areas Havant, Portsmouth, Fareham and Eastleigh along Winchester District's southern boundary;
- b) to prevent neighbouring towns merging into one another, such as Denmead and Waterlooville, Bishops Waltham, Waltham Chase, Shedfield, Wickham and Welborne, Curdridge, Durley and Botley/Boorley Green, Upham and Fair Oak, Colden Common and Bishopstoke, Otterbourne and Chandlers Ford, and Compton, Shawford, Hursley all merging with SW Winchester and Olivers Battery.
- c) to assist in safeguarding the countryside from encroachment, including NPPF Valued Landscapes
- d) to preserve the setting and special character of historic towns, such as Winchester Town
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land, which is what the Government says it wants to achieve, rather than the older urban South Hampshire authorities ducking their obligations and looking to the greenfields of the southern parishes of Winchester.

A new Green Belt would also prevent intense development along the border of the South Downs National Park, creating a buffer and protecting the land between the M27 and the National Park. It would prevent the urban areas south and west of Winchester Town from coalescing and ultimately connecting Eastleigh with Winchester.

If the countryside areas adjacent to the border with Fareham and Eastleigh are to remain intact, Green Belt is essential to stem the rapid development of Fareham and Eastleigh as their urban areas continue to sprawl northwards, as they have since 1974. It would also ensure much more focus is given to regeneration of the existing urban areas in place of the search for greenfield sites yet more distant from the urban centres, reliant on the car and leading to an ever-higher carbon burden on individuals and on Winchester as an authority.





A new Green Belt would drive development onto brownfield and previously developed land within the district, including Winchester centre and, alongside limited in-keeping development of existing settlements, it would make maximum use of existing infrastructure. It would also “force” the older urban South Hampshire authorities to start a more ambitious programme of regeneration than they have historically.

A Green Belt would emphasise the importance of the green and historic landscapes around the historic city of Winchester. It would provide vital access to the countryside for people living in the larger towns and cities of Winchester as well as Eastleigh, Fareham, Portsmouth, Romsey, Southampton.

It would also stop urban sprawl and merging of settlements. Large speculative car based green field developments would not be permitted, as they do not contribute to sustainable development.

NEF Report - Economic Value of a Green Belt

During the coronavirus lockdowns, there has been a surge of appreciation for the countryside and an awareness of the role that green spaces and nature play in our wellbeing. The value of the countryside nearest to our homes can be expressed in different ways. In 2019, we commissioned independent research to explore the social, economic and environmental value of the countryside in South Hampshire. The attached report ‘*Introducing a South Hampshire Green Belt Study – June 2020*’ by NEF Consulting, part of UK think tank the New Economics Foundation, focuses on the potential benefits to our health and wellbeing, the economy, and the value of nature and ecosystems.

The findings of this major piece of research were published in June 2020. The analysis is based on the large body of evidence from UK and international research studies on the environmental and economic benefits and physical and mental health benefits of green and open spaces – benefits that are being highlighted even more to all of us during the coronavirus pandemic. The report was presented to the PfSH authorities, with members again expressing their support for evaluating a new Green belt in the next round of spatial planning.

Key findings

- The research finds that the countryside north of the urban centres of South Hampshire could generate almost £26 million a year in terms of health, wellbeing, economic and ecosystem benefits if protected by a Green Belt.
- The health and wellbeing benefit for people living in and around this area of countryside could amount to up to £17 million a year. This value relates to the potential loss of wellbeing if the proposed Green Belt area was built on.



- The potential impact of building across the proposed Green Belt area may cost the NHS up to £690,000 in increased GP visits a year.
- The value of ecosystem services provided by the proposed Green Belt area for food, removal of air and carbon pollution, flood protection and biodiversity are estimated at £7.6 million a year. These are important aspects in tackling the climate emergency.
- The potential economic benefit from tourism and recreation in the proposed Green Belt area is estimated as much as £1.3 million a year.

Looking ahead over two generations, if Net Present Value (NPV) is applied to the annual figures, the estimated NPV over the next 60 years is:

- The combined NPV over two generations could produce well in excess of half a billion pounds in health, wellbeing, economic and ecosystem benefits.
- Up to £452 million in health and wellbeing benefits for people living in and around the proposed Green Belt.
- £192 million from ecosystem services provided by the proposed Green Belt area.
- £35 million in economic benefits from tourism and recreation activity in the proposed Green Belt area.

Much of this value would accrue to Winchester district as the authority with the largest area extent within the proposed area of search used for the study. Accordingly, CPREH considers that the introduction of a Green Belt in the southern part of the District should be an essential strategic element of the forthcoming Local Plan.

Landscape Policies

As an overall statement, CPRE strongly supports a forward-looking strategic plan that provides (subject to the overall requirement for sustainability) for a landscape-led approach to the siting and design of development, high quality design to maintain local distinctiveness and create high quality new landscapes and townscapes, the sustaining and enhancing of the heritage, scenic and amenity value of Winchester District and including ensuring the preservation of tranquillity, and intrinsic dark landscape.

In contrast we have always considered the current strategic policy CP20 of the Joint Core Strategy to be rather weak in terms of landscape protection, and indeed said so at the Examination. For a District with fine landscapes outside the SDNP, and which are acknowledged to be a fundamental to its special qualities, it is surprising that the policy on landscape is the last core policy in the current Plan, and combined with the historic environment. The revised NPPF has separate sections on the natural and historic environment, and we consider the new Local Plan should do likewise, in common with most other Districts.



NPPF 2019 paragraph 170 provides that planning policies should contribute to and enhance the natural environment by protecting and enhancing valued landscapes and recognise the intrinsic character and beauty of the countryside. CP20 makes no mention of identifying and protecting NPPF Valued Landscapes as required by NPPF 2019 paragraph 170(a).

This needs to be clearly stated in a strategic landscape policy, which in detail needs to emphasise conservation and enhancement of:

- Valued Landscapes
- Rural character
- a Green Infrastructure framework
- the landscape setting of settlements and transition between settlement fringe and open countryside
- the setting of the City of Winchester
- locally distinctive views, topographical features and skylines
- natural features such as trees, hedgerows, woodlands, meadows, field boundaries, coastal margins, water courses and water bodies;
- local distinctiveness and sense of place

A landscape-led approach to the Plan will help to ensure these policy aims are achieved and, when combined with high quality design, ensure that development is well integrated into the landscape. We note that, the emerging New Forest District Local Plan is stated to be landscape-led.

Tranquillity is covered in Policy DM22, but this does not comply with NPPF paragraph 180 which requires LPAs to "*identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason*". Areas of relative tranquillity need to be identified and mapped as part of the Evidence Base, and given a specific policy for protection from development.

LPAs should also "*limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation*". NPPD does not require identification of intrinsically dark landscapes, but to do so as part of the Evidence Base would assist their protection. Very often areas of high relative tranquillity and intrinsically dark landscape will be found together.

Equestrian and leisure development does have adverse impacts on landscape, through individual sites and cumulatively. Policies DM 11 and DM 12 need to be carried forward to ensure such development is of a scale, intensity, location and design which is compatible with the landscape character and special qualities of the area, re-using existing buildings wherever possible.



The SDNP, which occupies a significant part of the total Winchester District (albeit has its own planning responsibility) contains a number of highly relevant policies, as would be expected in a national park but they are equally relevant to landscapes outside the SDNP, and may provide helpful guidance. Strategic Policies SD4, SD5, SD6, SD7 & SD8 cover Landscape Character, Design, Safeguarding Views, Relative Tranquillity and Dark Night Skies.

South Down National Park (SDNP) and its setting

As the SDNP will be outside the area covered by the new Local Plan, CP19 will no longer apply directly, but the new Plan will need to have a policy which confirms the legal obligation on NFDC to have regard to national park purposes, as set out in para 9.51 of the Joint Core Strategy. This needs to state that development will not have an adverse impact on the special qualities of the SDNP, or its setting, and that very significant weight will be given to ensuring that its character, quality and scenic beauty and scenic beauty is protected and enhanced (viz. the recently adopted New forest District Local Plan)

Notably in relation to the setting of the SDNP, paragraph 175 of the January 2021 draft amendment to the NPPF provides that development within the setting of national parks should be sensitively located and designed so as to avoid adverse impacts on designated landscapes.

Identification of Valued Landscapes

Following the revision of the NPPF in 2018, para 170 (a) now provides

170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes.....(in a manner commensurate with theiridentified quality in the development plan);

This wording does indicate that all NPPF Valued Landscapes need to be identified in new Local Plans if they are to gain the protection afforded by para 170, and this view has been supported by an Inspector on appeal. So, we urge WCC to identify all the NPPF Valued Landscapes within the District (outside the SDNP) for inclusion in the emerging Local Plan, which may otherwise be found not to be Sound at Examination.

It is established in Court cases and appeals that NPPF Valued Landscape is countryside "*which demonstrates attributes beyond the ordinary*". Assessing landscape as to whether it is NPPF Valued involves a qualitative judgment which is absent from the separate process of Landscape Character Assessment.

The fact that considerable areas of the District outside the urban areas is likely to be NPPF Valued Landscape is demonstrated by the attached CPRE Hampshire assessment of a "*Tract of Land to the West, South and South East of Olivers Battery, Winchester. NPPF Valued Landscape*". CPRE Hampshire has done such assessments across the county and the results have been confirmed in those cases where the Local Planning Authority have instructed landscape consultants to assess the quality of the landscape.

Ecosystem services and natural capital

CPRE Hampshire encourages a focus on an ecosystem driven policy designed to maintain natural capital and value the environment, turning it into an asset. The role of ecosystem services in providing important societal and environmental benefits (long advocated by CPRE) has been recognised by SDNP and included as an integral element in their new Local Plan. This requires development to have an overall positive impact on the ability of the natural environment to contribute to goods and services (Core Policy SD2 - Ecosystem Services). With a significant part of WCC District falling under SDNP authority, WCC has the opportunity to align its 2038 Plan with SDNP environmental planning policies and transitioned across SDNP/WCC District boundaries in keeping with NPPF guidelines.

The benefits to be had from the natural world (ecosystems) include products such as water – a major issue over the next 25 years - food, raw materials (timber etc), functions such as soil formation/erosion, services such as water purification, air quality, health and wellbeing and the cultural benefits of access to the outdoors, as demonstrated in the NEF Report attached and already referred to in relation to the Green Belt issue

In January 2017, CPRE Hampshire responded to the proposed WCC Strategy 2017-2020 and broadly welcomed the proposals on Environment. Your commitment to protect and enhance the natural environment was reassuring as was your methodology and commitment to recognise and prioritise the importance of ecosystem services and natural capital.

In the context of a WCC Plan to 2038, short term protection of these assets is not optional, neither are planning exceptions, to accommodate predicted growth. These assets are finite and non-renewable. The Plan should clearly state how the Authority will assess and weigh natural capital consistently against increasing population pressures.

CPRE considers that the new Local Plan should include policies to protect the ecosystem services and natural capital provided by agriculture and other rural undeveloped land. Where significant development of such land is unavoidable, local planning authorities should seek to use areas of lower natural capital. Great weight should be given to the natural capital value of soil quality.

It is crucial to embed the importance of “ecosystems services” into planning. This would accord with revised NPPF paragraph 170 (b) which requires planning policies and decisions recognise the benefits from natural capital and ecosystem services.

Homes for All

The consultation document sets out 4 Options for accommodating development in the District and asks for these to be ranked in order of preference, but we feel there are flaws in each of the options as discussed below. Furthermore, CPREH has been unable to see that there has been an obvious objective process which resulted in the Options, and it is hard to see how they have been evaluated with respect to the overarching aim of carbon neutrality, or against that of sustainable development. That said, we understand why WCC have put forward 4 choices as a guide to help lead the public through the process, but since we have not felt any are suitable or appropriate, we have not ranked them. WCC have asked for a missing approach, and to that end we propose a hybrid version (an Option 5, see below) based on sustainable development principles and which minimises adverse impact on the climate.

Firstly, of critical significance to this consultation is the housing number calculation used in the Local Plan. CPREH notes that the latest ONS affordability ratios (released March 2021) used with the current standard methodology gives Winchester a reduced annual target of 665 dwellings per annum (dpa).

However, this consultation has been based upon earlier calculations of 692dpa, rounded up to 14,000 over the plan period, so that is the basis of our discussion. With 11,308 in the pipeline, WCC's remaining need of around 2,692 should be possible to meet over the plan period without recourse to large green field development. Taken that the housing shortfall during the plan period is by some margin less than 3,000 dwellings, WCC should not even contemplate a major strategic development which would need to deliver 5,000 + dwellings in order to be able to support the very extensive infrastructure associated with greenfield, new settlement schemes. Apart from the many arguments outlined below against this approach to housing delivery, not least its unsustainability, there is an inbuilt assumption that the full scheme will be delivered over more than one plan period and might very well take 25-30 years to reach completion. This however assumes that there will be inevitable demand for ever more housing stretching into the future, an assumption which is deeply flawed. And if a strategic scale development never reaches its full scale, the required infrastructure will inevitably not be fully delivered unless public funding steps in to subsidise its completion. (See Welborne in neighbouring Fareham as an example)

CPREH supports the detailed report that WCC have prepared on the historical contribution of windfalls to Winchester district's housing supply. This analysis proves that windfalls continue to make a significant input, and demonstrably this has remained stable over a period of years. The estimates set out for the period 2023/24 to 2037/38 show that 1,725 windfalls can be expected for the whole district, and that the figure does not include any supply from SHELAA sites. If that is the case, then the outstanding balance of 2,692 (assuming 14,000 @700dpa) could be reduced by 1,725 dwellings leaving only 967 to find. The requirement shrinks even more if you use the more recent standard methodology figure of 665dpa to an overall target of only 267.



CPREH have been told that WCC will not need to take any further housing over and above the 692 dpa (or the more up-to date 665dpa) from the other PfSH authorities and will not need to cover any failure to meet requirements on their part. Winchester has historically taken significantly more housing than its proportion of the population within the PfSH area should suggest, but we believe this has no justification now, if it ever did. There is no public scrutiny of decisions between PfSH members to 'trade' housing delivery numbers which in the west of the Partnership area has regularly been related to a stated difficulty on the part of the City of Southampton to meet its housing targets. Taken the Government has deliberately and justifiably decided that England's major cities should deliver 35% more housing than laid down in earlier targets, it would be perverse if Winchester were required to accept a higher target to 'assist' Southampton.

In the PUSH Spatial Position Statement of June 2016, Winchester was allocated 9,110 dwellings (5,370 in the west and 3,740 in the east). This was more than 5,700 dwellings over and above its own objectively assessed needs which were assessed as 3,375 (1,875 in the west and 1,500 in the east). The urban authorities must do a far better job of regeneration within their own boundaries as this is the only realistic path to a carbon neutral future.

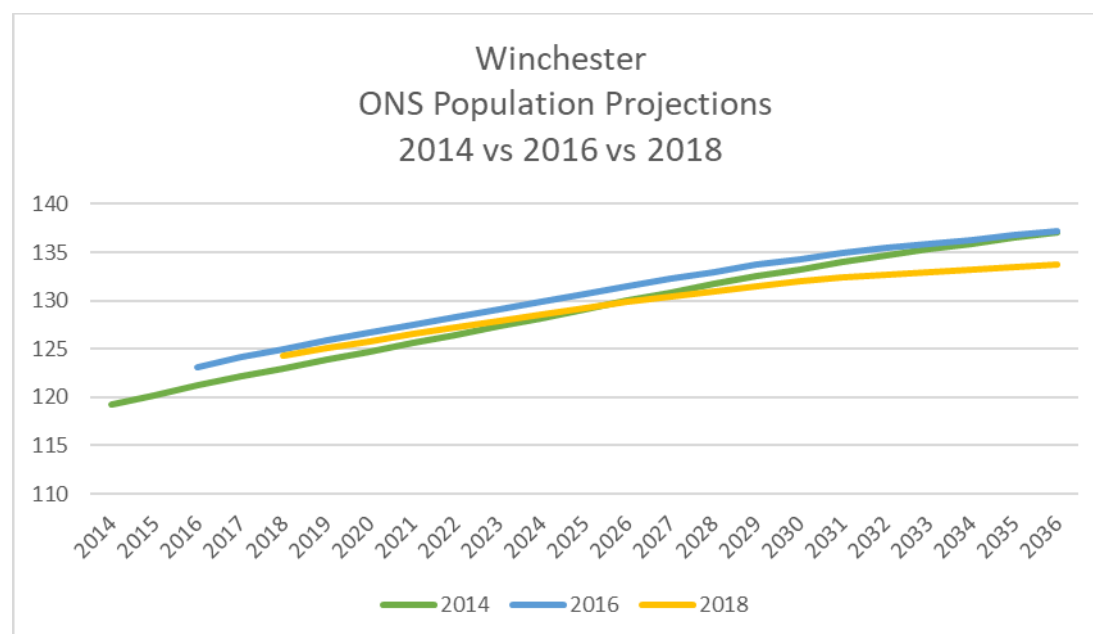
It remains important that the proportion of the district within the South Downs National Park (SDNP) is taken into account in calculating housing need, and this is as true using the current standard methodology as it would have been with the new methodology proposed by MHCLG but now withdrawn. In both methods part of the equation is based on housing affordability and this will be unduly biased by the presence of high house prices and constrained delivery for the approximately 10% of dwellings lying within the SDNP. CPREH have been making this case for some years, and WCC themselves made this point in response to the MHCLG consultation of August 2020. Planning Policy Guidance allows for an alternative approach in the case of national parks.

The issue is that National Parks are relieved of their duty to provide all objectively assessed housing need (OAN), and only need provide for local needs, which CPREH would argue should be based on local surveys. Paragraph 11b of the current NPPF on plan-making states that LPAs should seek to meet their objectively assessed housing needs – amongst other uses – unless protected areas or assets of importance, defined in Footnote 6 of the NPPF, indicate this is not possible. National Parks and AONBs are listed in Footnote 6. The 2010 Circular on National Parks, paragraph 78, reiterates this: 'The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment... etc.'

It would be unfair for the rest of the district (outwith the SDNP) to take artificially inflated housing numbers based on a biased price differential from the portion of the district that lies within the SDNP. This is particularly important if National Parks are relieved of their obligation to take their own OAN, and whilst we would argue that it should not then fall on the neighbouring authority to take this need anyway, if they ARE required to take up any demographic slack, then it must NOT be inflated by excessive pricing based upon an exaggeratedly constrained supply.

An article by Nationwide (August 2019) made a comparison with identical properties outside the park boundary. It showed that the SDNP commands a premium of £66k over a similar property. They also found there was a lower, but measurable difference just outside the boundary of a park, within 5km. Another article by Knight Frank (July 2019) compared prices within the park against those within 5km of the boundary. So this might be impacted by the buffer effect that was seen by Nationwide. They again found that the SDNP was the 2nd most expensive National Park. The average price within the SDNP was £691k compared to £492 outside the park (a £199k premium). There is most definitely a need for either Winchester CC or MHCLG to have data which can illustrate the differential and its impact on the standard methodology outcomes. This pricing differential needs to be disaggregated from the calculation of the uplift imposed on the remainder of the district.

With regard to demography, it is important to note that the latest available household projections for Winchester, 2018-based, show a considerable slowing in the rate of population growth as opposed to the 2014-based ones. For example, by 2038 the more-up-date projections indicate a reduction of over 4,000 in population and 1,500 fewer households fewer than with the projection used for the current standard methodology. As this will be ground-truthed during the 2021 census, it will be interesting to see the true position of Winchester district. Notably there are current legal challenges to the ONS assessment of population statistics in University towns (eg Coventry), and the implication is not clear for Winchester Town. This relates to the number of students who may not remain in a city after graduation but might be counted as having done so and therefore appear to have been double counted.





Without more data on the demography and geographic distribution of the population of the district, some of the options put forward are difficult to evaluate. An older document from PFSH suggested that 31% of the population of WCC may lie within the southern parishes (including Waterloooville and Whiteley), but we do not know if this still correct. CPREH has been told that the WCC Local Plan Part 1 shows the following current rough spatial split of population and allocated housing:

Winchester Town - 32% of 2011 population / 32% of the housing target

Market Towns & Rural Area - 65% of 2011 population / 20% of the housing target

South Hants Urban Areas - 3% of 2011 population (just Whiteley and Waterloooville) / 48% of housing target

There is some confusion and conflation in the document between the southern parishes (those currently within the Market Towns and Rural Areas (MTRA)) and the South Hampshire Urban Areas. It would be better if the South Hampshire Urban Areas could be better defined in the YPYP consultation document as being just Waterloooville and Whiteley. The report produced for WCC by Icenii in January 2020 on '*Future Local Housing Need and Population Profile Assessment*' indicated a decline in the population within Winchester's part of the SDNP, yet an increase in households, so this statistical anomaly needs further investigation.

CPREH own rough calculations of population based on parish profiles from Hampshire County Council show approximately 9% of the district's population live within the SDNP area. The same rough calculation puts 33% of the population into Winchester Town but this has probably grown, or will grow, as Barton Farm continues to develop.

CPREH recommends that more up-to-date parish or settlement demographic analysis is undertaken on behalf of WCC by the relevant department at Hampshire County Council.

Option 1 – The current Local Plan strategy previously allocated a disproportionate amount to the southern parishes of the district. Of the 12,500 homes, 6,000 (48%) were allocated to Waterloooville and Whiteley, but in addition a significant part of the MTRA's 2,500 dwellings also fell within the same geographic area (such as Denmead, Wickham, Bishops Waltham, Waltham Chase, Swanmore, Colden Common etc). As these settlements are completely car dependent we cannot condone continuing with this spatial approach, which would exacerbate adverse impact upon the climate. There is a line in the YPYP description under South Hampshire Urban Areas which states "*the current evidence suggests that the South Hampshire spatial area should be more widely drawn so there may be possibilities within the wider southern part of the district for the necessary development*". CPREH has not seen this evidence, so is unable to support this suggestion. It is important to be more specific about discriminating between Waterloooville and Whiteley and the southern part of the district as a whole. If this imbalance were to be rectified, then CPREH might find this approach more palatable.



Option 2 – This option at first glance appears to be the most sustainable, apart from one part sentence which might mean the inclusion of the so-called Royaldown proposal could fall within "Winchester Town". The words *"and to the south-west of the town"*, make it impossible for CPREH to support this option as we believe Royaldown, like all other large car-dependant greenfield proposals, are the least sustainable. Further, the countryside surrounding the south west of Winchester is NPPF Valued Landscape which needs to be protected from large scale development, see *"Tract of Land to the West, South and South East of Olivers Battery, Winchester. NPPF Valued Landscape"* attached

Option 3 – This is by far and away the most unsustainable, carbon intensive, profligate option suggested in the YPYP consultation. A large-scale greenfield option should be resisted at all costs, anywhere in the district, be it Micheldever, Royaldown or somewhere as yet unnamed in the southern parishes. The commentary starts with introducing the prospect of 'Strategic Development Opportunity Areas' being assessed by PfSH, and it is suggested that this would meet the needs of the wider area. CPREH would oppose this possibility strongly. Waterlooville and Whiteley have yet to be properly absorbed into the wider community, they are both intensely car dependent with congestion and air pollution being the result. Winchester's southern part has already contributed to the wider needs of the area by providing considerably more than its own needs would have required. (see comments on the PUSH Spatial Position Statement 2016 above). To allow more of this to continue would undermine any attempt to substantially improve urban regeneration in the urban areas to the south. To add further to this adverse situation would be a seriously retrograde step. Looking at several thousand homes into the next plan period is highly likely to be an unnecessary step as population growth is slowing, (as per 2018 projections), and Covid and the growth of the internet may change our living and shopping habits forever. Yet a minimum of 5,000 new homes is necessary for any attempt at an integrated and self-contained development.

It is not made clear from the YPYP consultation that the 1,700 (5,000) houses would actually fall into what is now classed as MTRA, and CPREH suggests this is likely to be misleading and confusing for members of the public who are not used to responding to local plan consultations.

If such an option is even to be contemplated, and we hope it is not, there is nothing in the commentary about public transport. Self-containment is almost never realised, as is evidenced by Waterlooville and Whiteley, and this option would just encourage more car journeys from home to work/recreation. It also risks reducing the sustainability of Winchester Town.

Option 4 – It is hard to evaluate this option without having the data on the demography and population of the component parts of the district, but at first glance it seems to allocate less to Winchester Town than we would expect, which would be more in the region of 5,000 dwellings.

New Option 5 - CPREH believes there is an alternative approach, which starts with Brownfield first and then moves on using a sequential approach designed to meet the requirement of around 2,692 homes. We have termed this Option 5.



Firstly, build out existing permissions. (already accounted for by WCC – 11,308). In general, CPREH would wholly support WCC using its own target of 1,000 council homes as the first priority in any of the categories below, and this gives the Council much more control over spatial distribution, carbon footprint, design and density, let alone type and tenure.

Then in sequence:

- Increased densities in existing allocations, maybe 11,308 can be improved upon
- Windfall allowance, small & large sites (1,725 based on historical statistics). Note these two categories alone then only leaves a requirement of some 967 using 700dpa, or only 267 using the more up-to-date annual target of 665dpa
- Brownfield sites in SHELAA. The SHELAA attributes a potential of 869 dwellings to brownfield sites. CPREH accepts that possibly not all will be appropriate, but nonetheless this is the obvious place to start to look for suitable sites, and is considerably more than the number carried in the Brownfield Register. The sites included in the register are constrained by the requirements set out in the legislation. CPREH supports WCC in its renewed call for additional Brownfield sites.
- Specific Brownfield sites - Sir John Moore Barracks. The SHELAA suggests 600 in 1st 5 years, then an additional 664 thereafter, so approximately 1,264 could be considered a maximum. CPREH understands that the figure is likely to be lower in order to keep areas of high nature value.
- Under-utilised land and buildings, eg Class E permitted development right and changing role of High Streets, but we not believe that a quantitative analysis of this opportunity has yet taken place
- Urban regeneration - eg Central Winchester, is there an opportunity to revisit the balance of retail and housing in the plans?
- Car parks - build over to leave car park as undercroft
- Re-allocation of land from other use to housing, eg Bushfield Camp, say 20 hectares (out of a total for the site of 43h) at 30dph, so up to 600 dwellings possible
- Suburban densification, see attached Policy Exchange paper for ideas.
- If there is still a requirement for allocations, then Urban sites, small.
- Rural sites, small, to meet local need and avoiding both NPPF valued landscapes and the potential for gap erosion and settlement coalescence.

CPREH believes that this sequential, hierarchical process will lead to the most sustainable pattern of development, and that the spatial and geographic analysis will then naturally follow. It is clear that WCC share many of these aspirations to use land most effectively, but the Options proposed did not make it sufficiently clear that this was an underlying thread.

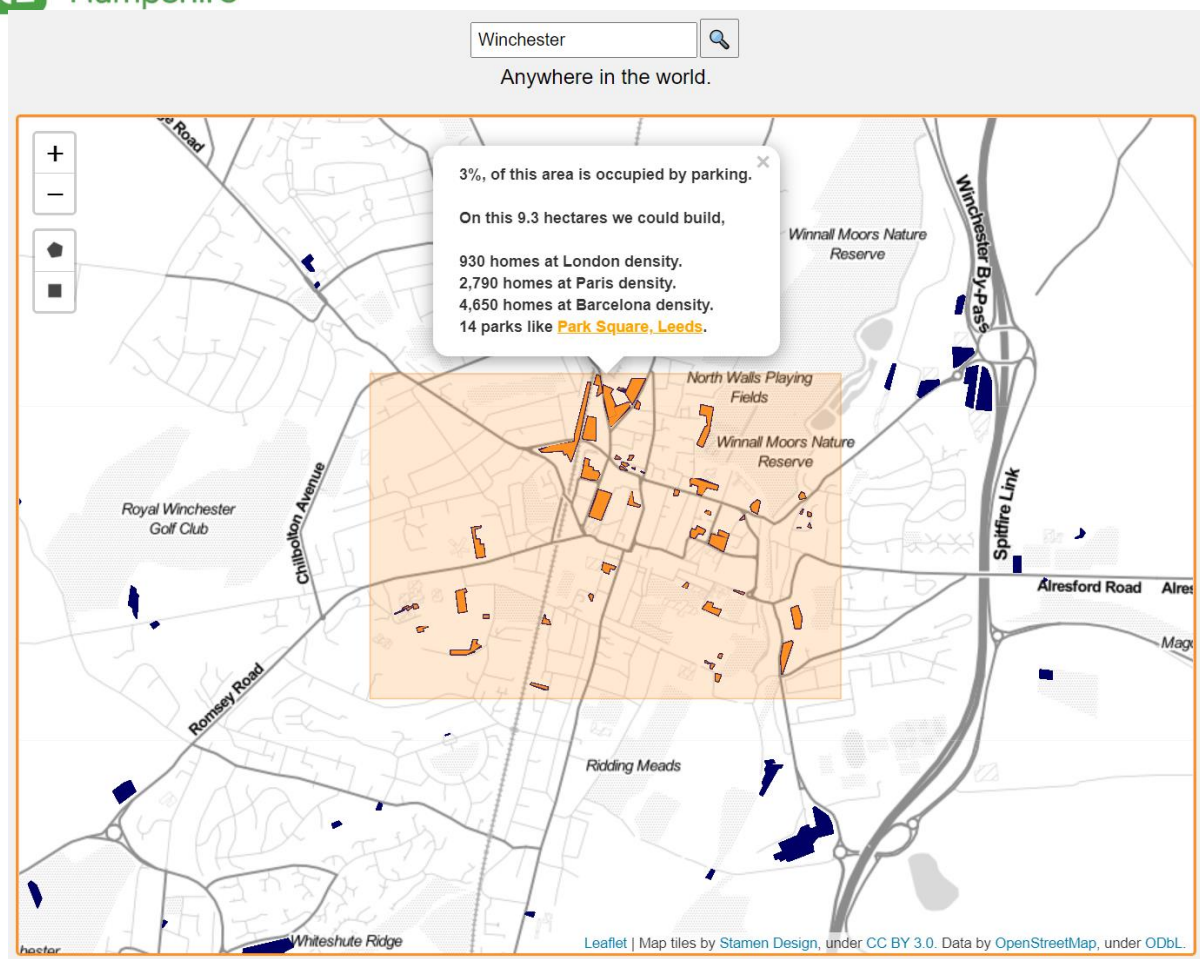


We note that the Iceni '*Strategic Housing Market Assessment*' of February 2020 indicated a higher need for affordable housing in the Winchester Town area, followed by the north, then the south. This would support concentrating additional development within the Town, which is the most sustainable settlement in any case.

In order to identify sites in many of these categories it is not sufficient to rely on sites put forward by developers through the SHELAA process. A proactive process is needed, similar in objective to urban capacity studies of the 1990s but a simpler, more broad-brush approach designed purely to identify opportunities in the above categories for further investigation. We have called this an Urban Opportunities Study. The public could be involved in coming forward with suggestions.

The above sequence of development is strongly supported by the quite extensive guidance in NPPF Chapter 11 on making effective use of land, in the context of sustainable development and minimising the use of greenfield sites. It says that strategic policies should set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed or "brownfield" land. Specific routes to that aim which planning policies should pursue are set out. Planning policies should also pursue efficient use of land and optimising use of land by through higher densities, where appropriate.

An Urban Opportunities Study will assist in complying with these requirements. Just as an example as to how car parks could be developed, we have used a website called Parkulator (<http://imactivate.com/parkulator/>) which attributes certain densities to surface car parks and analyses how many dwellings could replace them. Whilst CPREH is by no means advocating wholesale loss of every car park in Winchester Town, it just gives an indication of the art of the possible. And in any event, ground level parking can be maintained as an undercroft.



As regards the final set of questions these are quite detailed technical issues which just do not lend themselves to simplistic yes/no or ranking answers as part of a public consultation. The consultation assumes the public have a detailed understanding of the range of housing needs of the District. Rather than attempt to answer the questions one option could be to defer any views pending an up-to-date assessment of housing need. Some of this information is available in the Iceni 'Strategic Housing Market Assessment' of February 2020, but we suspect that not many of the public will have engaged with this evidence base, and it may need some post-Covid re-analysis. In terms of seeking to develop communities then WCC should then use this information to inform decisions on the mix of housing eg to have specialist housing as part of any large new sites. The balance of need may be different in the various locations across the district. CPREH wholly supports WCC's proposal to build 1,000 council homes in the plan period.

In any event, CPREH believes that in the Question 2 list social housing should be included under housing needs.



Vibrant Economy

The Local Plan should encourage sustainable development - a strong and competitive economy, meet housing needs, support physical and mental health, social and cultural well-being, and protect the character, historical significance and heritage of the District and strenuously protect the natural environment. Some of these issues will be in conflict, and setting criteria for measurement and appraisal of outcomes difficult, but there are opportunities to reduce carbon emissions significantly throughout by making careful choices. Growing a Vibrant Economy for Winchester District will involve developing more wealth-earning businesses in the vital knowledge economy, digital and creative industries, already successful here. They often have a relatively light 'carbon footprint' and can operate from small premises, from home or in small incubation hubs, especially important because knowledge and skills can be shared.

There are also growing opportunities in the 'green economy' for businesses that produce goods and services that benefit the environment or conserve natural resources. Energy efficient technologies in the construction industry can help off-set the carbon load that house-building, infrastructure and related development causes.

Many of the roles above involve young people (another strategic aim for WCC) but must go hand in hand with provision of more, small-scale affordable housing (including work space where appropriate), active steps to build skills for enterprise and much improved carbon fibre broadband and mobile connectivity, still very patchy in many parts of the District. As around 60% of the District's residents live in rural areas and small market towns, this is vital and can significantly reduce the need to travel.

Tourism, retail and hospitality, of course, need re-development following the pandemic. The countryside is a magnet for visitors, who also support heritage assets, specialist destination shops and hostels to be found in market towns and villages, which are also important community centres. The countryside is also closely linked to physical and mental health benefits. It is recognised, though, that tourism, especially large-scale events, can be problematic as well as economically beneficial. Improving public transport and encouraging 'active travel' can partially off-set car use but is impractical for many purposes.

The countryside is also the home of many land-based activities: agriculture, forestry, fishing, local food production, wardens and rangers. They provide relatively fewer jobs but play vital roles in shaping and maintaining the countryside that supports biodiversity and attracts visitors. Farm/forestry diversification can make use of existing buildings where possible. Always using previously developed buildings and land wherever possible and using it efficiently is an effective strategy that protects green field sites and the tranquillity they offer for mental health and well-being.



Whilst the countryside contributes a great deal to a 'vibrant economy' in Winchester district, it needs to be much better understood, recognised and supported in future strategic thinking. A Rural Economic Strategy may be needed to encourage opportunities without damaging the countryside and the benefits it provides.

Winchester cannot afford to lose countryside-earned income; Winchester cannot afford to lose or degrade countryside.

Living Well

Open and tranquil green spaces within and on the edge of urban areas are crucial for the health, recreation and well-being of residents. The Local Plan process needs proactively to identify such spaces across the District to designate as NPPF Local Green Space. Local parish councils can be canvassed for potential sites, and encouraged to put them forward to update the Evidence Base. Any such sites already designated will need to be expressly carried forward into the new Local Plan.

In new large developments, provision for informal open spaces, sports, community facilities, allotments, friendship benches and spaces etc., need to be planned alongside different types of housing. Density of housing could be increased as a means of finding space for "living well" facilities. Apartments need balconies to connect with the outside world, and for apartments designed for the elderly there need to be lifts. Allotments off site should be provided where private garden spaces are limited. Dwellings need to be of sufficient size to accommodate working from home.

In planning for an ageing population, mixed developments are not always the answer. Elderly people may need more single use developments offering quiet and calm, and perceived as "safe". Within these, however, communal spaces and community facilities are still needed.

Urban regeneration schemes can offer exciting opportunities for establishing strong mixed-use communities, for young people starting out, for older people downsizing, all making use of existing facilities and services. Imaginatively re-peopling central Winchester Town, for example, could provide sustainable alternatives to using tracts of high-quality countryside.



Transport

All new development must plan around integrated residential, leisure, employment and retail areas, thus reducing need to travel.

Adequate public transport is required to meet growth and ensure that an attractive service is on offer. This is especially important if those living in rural areas are to be tempted out of their cars. Criteria must include quality of vehicle, information, frequency, timetabling, driver's attitude and cost to passenger. Modal interchange must be minimised, but, where unavoidable, should be as painless as possible. Getting these right will induce modal shift.

To encourage modal shift, it is not only necessary to provide an attractive alternative, but also to make the status quo less attractive. For example, Pelican crossings can be adjusted so that a pedestrian call can be answered more quickly, and green time can be longer. Zebra crossings could be more prevalent than now.

Walking has to become regarded as the option of choice. To achieve this, it has to be safe and hassle-free. Vital for this are the points of contact with other modes. If pedestrians are at risk at road crossing points, or are inconvenienced by using them, it will deter walking. Prioritisation of modes is important. If, for example, use of shared space is perceived as being too favourable towards cyclists to the extent that walkers feel vulnerable, the concept of that space will have failed.

Reduction of emissions will not happen overnight, and will rely on careful design by Councils. There are ways of influencing this. For example, the reservation of the most convenient parking for electric vehicles, with adequacy of charging, would be steps in the right direction. Further down the line, motor vehicles could be banned from the city altogether and drivers forced onto park & ride. The speed at which this transition could be achieved would need to reflect changing public attitudes.

Low Energy Infrastructure

CPREH supports the development renewable energy infrastructure but maintains that solar panels should be sited on buildings, especially in industrial areas, and on brownfield sites in clear preference to the countryside. Where countryside sites are proposed Local Plan policies need to ensure they will only be permitted where the landscape and visual amenity impact is minimised by screening and is then acceptable. The standard of acceptability will need to be higher where proposed in NPPF Valued Landscapes. Fencing and lighting should be kept to the absolute minimum.

Similar considerations apply to single small wind turbines of less than 100kw. They should be similar in scale to existing buildings and trees, set against a backdrop or suitably screened, in an appropriate colour, and be assimilated into the landscape.



CPREH is opposed to large wind turbines within Hampshire, and much of the County does not have sufficient average annual wind speed for commercial scale wind generation. Local Plan policies should discourage such applications, which it is known from prior applications will generate much local and wider opposition. If ever approved, it should only be with the clear support of the local community.

CPRE Hampshire South Downs & Central Planning Group

Attachments

'Case for a South Hampshire Green Belt' - CPRE Hampshire

'Planning for a South Hampshire Green Belt' - CPRE Hampshire

'An Assessment of the Effectiveness of Settlement Gap Policies in South Hampshire in preventing Urban Sprawl & the Coalescence of Settlements' - West Waddy Planning Consultants

'Introducing a South Hampshire Green Belt Study – June 2020', NEF Consulting

'Tract of Land to the West, South and South East of Olivers Battery, Winchester. NPPF Valued Landscape' - CPRE Hampshire

'Strong Suburbs, enabling streets to control their own development' - Policy Exchange