

## Privacy and publication

We are unable to legally accept anonymous submissions to the consultation. You must therefore provide your consent below before you are able to submit your response.

### Privacy Notice

Any personal information that you supply to Winchester City Council will only be used for the purposes of the work required to prepare a Local Plan under the Planning Acts. We need to collect this information in order to maintain accurate records to ensure that you can be properly involved in the preparation of the Local Plan. This will include general updates on the progress on the Local Plan, sending updates/surveys/newsletters, inviting comments on the Local Plan as it moves through its statutory stages and being notified of the date of the Local Plan Examination and be invited by the Inspector to speak at the Local Plan Examination. Any comments that are received in connection with the Local Plan will be published but they will only display the person/organisation name and postcode beside them. Any information that is received, including contact details, will only be kept until the Local Plan is adopted.

As part of our statutory functions, we will share data with the Planning Inspectorate who will hold the Public Examination on behalf of the Ministry of Housing, Communities and Local Government. You have the right to see what information is held about you, to have inaccurate information corrected, to have information removed from our system unless we are required by law or a statutory purpose to keep it and the right to complain to our Data Protection Officer if you feel that your data has not been handled in accordance with the law.

Further information about how Winchester City Council uses personal information can be found on our website at [www.winchester.gov.uk/strategies-and-policies/privacy-policy](http://www.winchester.gov.uk/strategies-and-policies/privacy-policy).

#### 1. Please confirm that you have read and understood the above.

(Required)

## About you

Please add your personal details below. If you are acting as an agent, please also fill in your details where requested below.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publicly available, therefore we cannot accept anonymous representations. The Council will publish names and associated representations on its website but will not publish personal information such as telephone numbers, or email addresses.

You must fill in these details before you can submit the form.

### 2. What is your full name or client's name if acting as an agent?

Name of respondent (or client): (Required)

Wickham and Knowle Parish Council

### 3. If you are representing an organisation or acting as an agent, please provide the name below.

Organisation/Agent:

### 4. What is your address?

If you are responding on behalf of an organisation, please put the organisation's address below. If you are acting as an agent, please put the company address below.

House number/name: (Required)

Parish Council Office

Street address 1: (Required)

Knowle Village Hall

Street address 2:

Knowle Avenue

Town/area: (Required)

Knowle

Postcode: (Required)

PO17 5GR

**5. What is your email address?**

Email address:

clerk@wickhamparishcouncil.org

**6. What is your phone number?**

(Required)

Phone number:

01329 553254

**7. By submitting this form I acknowledge that;**

**a) my response, together with supporting information, which includes my name, address and contact details will be sent to the Local Plan Examination Programme Officer and the Planning Inspectorate; and**

**b) my name will be published, together with my response, in the Winchester City Council Local Plan Examination website.**

**8. Please select the box below if you would like to be kept up to date on the developments to the Local Plan via the email you have provided?**

Yes, I would like to be kept up to date with Local Plan developments

No

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

WK5 and WK6

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

1. Wickham and Knowle Parish Council does not agree that the Winchester City Council Regulation 19 Proposed Submission Local Plan ('the submission plan') meets the test of soundness as set out in the National Planning Policy Framework. As a result it does not satisfy the relevant requirements of the Planning and Compulsory Purchase Act 2004.
2. The plan is not sound because it has not been positively prepared and that policies WK5 and WK6 making site allocations in the parish of Wickham and Knowle, are not justified. The Parish Council does not consider that the submission plan provides a reasonable justification for any site allocations in Wickham over and above that made by policy KN1.
3. If, however, it is accepted that additional site allocations are required then those allocated by the plan at WI02 Mill Lane and WI03 Southwick Road/School Road (*References W102 etc relate to those given in the Strategic Housing and Employment Land Availability Assessment*) are not the best available sites for development in the parish. The Parish Council does not support these allocations.

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4. The specific defect identified in this representation can easily be remedied by a modification to the submission plan. Our first position is that policies WK5 and WK6 should not have been included from the submission plan. However, if that is not to be accepted, WK5 and WK6 should be replaced with a revised policy making the correct site allocation. The Parish Council asks the Inspector to require that one of these modifications is made. It is to be hoped that the City Council will make the necessary amendments but should in the unlikely event that the City Council refuses to do so, the plan should be found unsound.
  
5. If a development allocation is required for Wickham over and above the site at Ravenswood in Knowle Village then sites WI02 and WI03 should be replaced within the plan by the allocation of WI24 Mayles Lane. For reasons we will explain, WI24 is a preferable location and more deliverable site. The City Council's reasons for choosing WI02 and WI03 in preference to WI24 are unclear. They are not 'better' sites by any objective measure. WI24 would provide both housing and community benefit which accords with the purposes of the planning system. In selecting WI02 and WI03 in preference to WI24 the City Council has not been positive, open or transparent in site selection. This is not an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence.

#### **Background**

6. Wickham and Knowle Parish Council represents an area which includes two settlements. One is the ancient village of Wickham which has shops, pubs and community facilities which justify it being categorised as a 'larger rural settlement' in the submission plan. The other is Knowle which is a residential development created in the last twenty years on the site of a decommissioned Victorian hospital. It has no village centre of its own and residents are reliant on Wickham and larger settlements to the south for their services and activities. Although they each have their own sense of identity and distinct qualities, the parish council believes it unreasonable for Wickham and Knowle to be treated as separate settlements for planning policy purposes.
  
7. In the early stages of Regulation 18 consultation on the emerging local plan (*Development Strategy and Site Selection 2022*) the City Council considered that a sustainable increase in Wickham's housing numbers would be met in full by the allocation of site WI18 Ravenswood on the edge of Knowle (Policy KN1 in the submission plan) which already has consent for some of the proposed development. The Parish Council supported this as a sustainable level of development for the parish as a whole. At the time the City Council also accepted that 'Wickham' meant Wickham parish and wrote to the Parish Council to confirm this.

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8. During Regulation 18 consultation the City Council said:

*“Sites were considered in accordance with the methodology set out in section 5 of this document. There are currently a number of sites allocated in the adopted local plan being developed. There is an opportunity at Knowle to deliver 200 homes at the Ravenswood site with significant community gains. The Council considers that given the community discussions held at that time, **this is the best way to meet the identified level of development for Wickham in the emerging development strategy** (ibid).”*

(Our emphasis added and note that the City Council does not distinguish between Wickham and Knowle in this consultation – it rightly assumes that the two settlements represent one mutually interdependent place within the parish)

9. Later in the Regulation 18 consultation the City Council changed its stance, requiring Wickham to allocate a further 100 dwellings.
10. Paragraph 6.29 of the 2024 version of the Development Strategy and Site Selection document states:

*“The Regulation 18 draft Local Plan did not include a proposed allocation at Wickham due to the availability of a site at the nearby settlement of Knowle, which was brought forward as an exception site and has since reached the point where permission can be issued once appropriate s106 agreement(s) are signed. Following consideration of the responses to the regulation 18 consultation, the Council has reconsidered and the Proposed Submission Plan contains sites adjacent to the settlement of Wickham to deliver about 100 dwellings in line with the settlement’s categorisation as a Larger Rural Settlement in the Settlement Hierarchy Background Paper.”*

11. The City Council has provided no explanation for this shift, other than to state that it was a reaction to Regulation 18 consultation response from a single unnamed source. For some reason the City Council has adopted a position inconsistent with its previous approach by drawing a distinction between Knowle and Wickham. The addition of 100 dwellings in Wickham is now justified by identifying Wickham as a Larger Rural Settlement separate from Knowle. However, were this to be correct, Knowle should be categorized as a Smaller Rural Settlements in the 2024 Settlement Hierarchy, and should not receive an allocation at all. The City Council’s position is illogical and lacks transparency.

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12. This lack of justification for the inclusion of policies WK5 and WK6 could be remedied by the removal of those policies.
13. However, if the City Council is to be permitted to adopt this approach then it must ensure that it allocates the correct site(s) for development in Wickham. In August 2022 the Parish Council submitted its assessment of the five SHELAA sites within the parish, without expressing a preference between them having been told that no allocation would need to be made. Following its change of position the City Council demanded via a letter dated 10<sup>th</sup> April 2022, that the parish council identify its preferred site for approximately 100 homes by 17<sup>th</sup> May 2024.
14. The Parish Council responded to this unreasonable requirement stating:

*“The Parish Council has been given inadequate time to consult with residents on the implications of this change in your policy position...Should the City Council disagree and proceed with evaluating sites for possible allocation, the Parish Council expects to be fully consulted as part of that process”.*
15. The Parish Council received no reply or further engagement from the City Council. The City Council selected the sites WI02 and WI03 without further consultation and the Parish Council were only made aware of this immediately prior to the publication of the submission plan. It made representations to the City Council’s Scrutiny Committee and Cabinet regarding the lack of consultation and inappropriate choice of sites, but these concerns were waived aside.
16. Paragraph 16 of the NPPF requires that ‘plans should be shaped by early proportionate and effective engagement’. The expectation should be that local communities should have the opportunity to actually shape the future of their local area. Wickham has been provided with inconsistent and incorrect information and has not enough time has been given for timely consultation with its residents. The sites selected by Winchester City Council do not reflect the views of the local community.

**The City Council’s chosen options – unjustified and possibly undeliverable**

17. Sites WI02 and WI03 have serious shortcomings and cannot be supported.

*Mill Lane WI02*
18. The plans submitted by Bloor Homes require vehicular access to the site from Mill Lane. There are no alternative access options. Mill Lane is a rural, narrow country lane and there can be no certainty that the road can be widened to allow two cars to pass, or pedestrians to move safely. This raises a serious question mark over its deliverability. Any reconfiguration of Mill Lane would be contrary to Policy NE14 - Rural Character. The same applies to the roads beyond Mill Lane that feed into it as they would also need modification.
19. The site has the potential to expand further and would have further dire consequences to the rural character of Mill Lane and its surround area.
20. The site is located within an SSSI Impact Risk Zone for residential planning applications, i.e. within 500m of a locally designated wildlife site or ancient woodland.

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21. It is very close to the boundary with the South Downs National Park and therefore may be subject to an objection at a later stage from the National Park Authority.

*Southwick Road/School Road (WI03)*

22. Residential development on WI03 would see Wickham sprawl eastwards; substantially beyond the existing boundary of the existing settlement.

23. The City Council describe this site as surrounded by residential land uses to the south, and agriculture to the north, east and west; however this is factually incorrect. There are agricultural uses to the north, south and east of the settlement.

24. Significant archaeological remains were discovered during the development of an adjoining site and this poses a significant risk to the deliverability of development on this site.

**The Parish Council's preferred allocation**

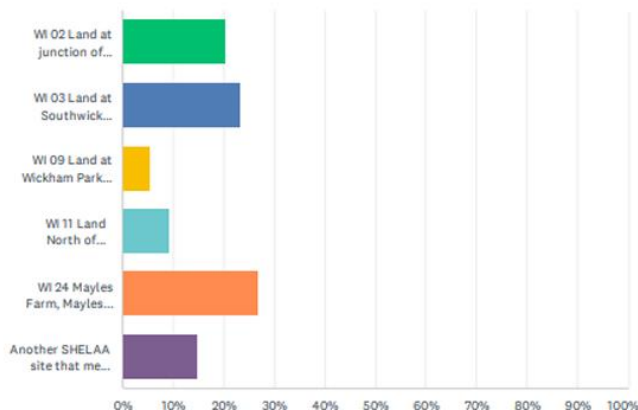
*Mayles Lane (WI24)*

25. The Parish Council's considers this site to be the best available alternative for the full allocation, because :

- it was supported by the greatest number of residents when the Parish Council sought public views before its response to the City Council in 2022

Q1 Please indicate your preferred site or sites for development of 90-100 houses in Wickham up to 2039 should it be required. Further information on this link <https://wickhamparishcouncil.org/housing-in-wickham-to-2039/> 26.5.22 statement below no longer applies: Note Winchester City Council has confirmed that the Ravenswood proposals - WI 18 - will not meet the settlement of Wickham's requirement to take 90-100 houses to 2039.

Answered: 142 Skipped: 9



Source: Wickham and Knowle Parish Council online survey

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- part of the site comprises previously developed land
- development of the site would maintain the compact form of the village and avoid an obvious extension of the settlement out into the countryside
- access to the site can and must be provided via Hoads Hill (not Mayles Lane). Hoads Hill is being improved as part of the nearby Welborne development, making the access suitable with less impact
- the site is within walking distance to the shops, facilities and services and unlike WI02 or WI03 is on a local bus route which further enhances its status as a more sustainable location for development
- it offers significant potential opportunities for public open space and a connected network of greenspaces which would sit alongside the Welborne development and provide the opportunity of delivering a continuous walking connection to Knowle to the south
- by agreement with the site promoter it will be possible to include additional football pitches adjacent to the existing recreation ground, representing a clear public benefit which mitigates the impact of the development. This site for sports has significant advantages over the Mill Lane designated Sports Pitches site
- the promoter has allowed a 20 meter open space buffer between the development area and neighbouring properties
- it would maintain the open gap between Wickham and the Welborne by formally designating the land as part of a network of green spaces, forming something close to a country park for the benefit of residents
- The Parish Council has reviewed all the information available before resolving to support site WI24. It is acknowledged that it is in Local Gap, but nevertheless the merits to the site are clear and therefore supported by policy NE7 of the submission plan.

### **Summary**

26. The last minute decision (and it was a last minute decision whatever they now say) of the City Council to require 100 homes to be provided in Wickham in addition to the 200 allocated at Ravenswood was indicative of poor community engagement and transparency in plan making. For the City Council to have changed its position because of one unnamed and unexplained representation is illogical and raises questions about the Regulation 18 consultation.
27. However, if the City Council is determined to make a further allocation it must do so in a way which represents justified and purposeful plan making. The decision to allocate WI02 and WI03 does not meet these tests. The inclusion of those sites render the submission plan unsound.
28. Modification of the submission plan by the substitution of WI24 would not only be preferable in accordance with guidance on sustainable development contained in the National Planning Policy Framework but would also ensure that the submission plan met with the wishes of the local community in this respect.

Please make sure that you put in all the evidence and information needed to support your representation.

**What modification(s) are necessary to make the policy legally compliant or sound?**

Replace polices WK5 and WK6 with a single policy which allocates the site WI24 for up to 100 dwellings in lieu.

**What is your suggested wording or text for the policy:**

An appropriate policy wording which allocates WI24 and requires the preparation of a masterplan with up to 100 residential dwellings on land immediately to the south west of Mayles Lane and the entirety of the remainder of the site given over to public recreational use with stewardship arrangements to be agreed. For information, the site promoter has prepared a concept masterplan which may be considered by the examination.

**The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination. If the Inspector invites you, do you consider it necessary to participate in the examination hearing sessions?**

(Required)

Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

No, I don't want to take part in a hearing session