To: Winchester City Council

 Hursley Parish Councillors

 Chairs of Neighbouring Parish Councils

 Hursley Parishioners

From: Hursley Parish Council

Response from Hursley Parish to Winchester City Council (WCC) in relation to the recently issued SHELAA and the Proposed Royaldown Development

Hursley Parish wishes to put on record that we have fundamental and significant objections to any such scale of development in Hursley Parish, both implied in SHELAA and in the Royaldown document, an appraisal of which is attached.

We as a parish recently completed our Parish Plan and WCC have been sent a copy of this.

Following on from this, the parish had already commissioned the development of our Neighbourhood Plan and this is currently undergoing registration with WCC (note that this document does not form part of the Neighbourhood Plan process).

We have since been made aware of the Royaldown proposal and consequently our feedback to WCC contains both comments regarding the SHELAA report and the Royaldown proposal.

There are many difficulties which would pertain to any development on this scale.

Just an example of some of our concerns include;

* We cannot see a need for this scale of development and would not want to see this reflected in the Winchester Local Plan
* The SHELAA site is very close to an ancient monument
* Concerns about the historic conservation area of Hursley
* Traffic would be a serious problem and has not been fully considered
* Water and sewage drainage are major concerns given the already difficult situation as demonstrated by the recent use of the sewage system to relieve groundwater flooding. Given the topology of the area any major development will exacerbate this and would require major new drainage work.
* Destruction of rural views and landscape which will completely change the rural character of Hursley Parish
* Hursley would become an urban extension of Winchester

There may be additional issues we would wish to raise in connection with the SHELAA and in relation to other areas of Hursley Parish, and we reserve to right to respond at a later date in connection with these.

David Killeen – Chair of Hursley Parish Council

Planning Appraisal of Proposed Royaldown Development in Hursley, Hampshire.

Steve Lees MRTPI - November 2020

**Summary**

The proposed ‘Royaldown’ between Winchester and Hursley is promoted as a holistically planned development based on 21st century garden city principles. This appraisal based on the material published in November sets out the key elements of the scheme raises a number of questions regarding the development’s credentials as a garden village. The key conclusions are:

1. the need for a development of anything like this scale has yet to established
2. there is considerable uncertainty that the scheme would make a significant contribution in the next 10 years to the development needs of Winchester District
3. the proposals in their current form are unlikely to deliver a sustainable form of development consistent with all of the garden city principles
4. the development would have a significant impact on the landscape character of the area and the setting of Hursley village resulting in its coalescence with Oliver’s Battery.

**1. Introduction**

1.1. The purpose of this paper is to provide commentary on the main planning issues arising from the proposal on land north east of Hursley for 5,000 dwellings to Hursley Parish Council (HPC).

1.2. The proposal includes the land within the Winchester City Council (WCC) SHELAA site HU02 published in 2020 and the comments in this paper are relevant to the consideration of that site by the City Council for potential development.

**2. Planning Issues and New Communities**

2.1. The proposal comprises: 5,000 homes in two phases of 2,000 and 3,000 respectively, a major area of employment, a park and ride facility and a range of facilities and infrastructure to serve the development, including a number of solar farms. It covers the area proposed for development included in the WCC SHELAA site HO02 and additional land in adjacent parishes.

**3. The Case for New Development Allocations in the Emerging Local Plan**

***need for the development.***

3.1. The proposal is predicated on the assumption that more development will be required to be provided for in the new Winchester Local Plan. WCC has yet to identify the scale of development it will need to deliver. That figure will be established through the Government’s standard methodology, which is currently being reviewed, and local circumstances in terms of planning constraints.

3.2. The Government current advice in the NPPF (2019) position is that local planning authorities should base their planning decisions on the 2014 ONS projections and should not delay reviewing their existing plans as result of the recent White Paper Planning for the Future or the potential changes to the standard methodology for estimating housing need. The 2014 figure for WCC was 692 dwellings per annum (dpa). The current adopted local plan sets out a figure of 625 dpa. In January 2020, the Council published a report ‘Future Local Housing Needs and Population Profile Assessment’, by consultants Iceni, to provide a realistic assessment of the District’s future housing needs based on the Government’s standard methodology current at the time. The report recommended a figure of 664 dpa.

3.3. The Government published, for consultation, in the summer of 2020 a new methodology which gives rise to a much higher figure for WCC of 1025 dpa. It has yet to announce its response to the comments received but it would appear in the light of opposition from its own MPs and others that a revised methodology which results in a lower figure would be the most likely outcome.

3.4. The housing figure which the new local plan for Winchester will need to meet will be central to the consideration of how many homes will be required and the most sustainable locations for them and the most appropriate strategy. A key consideration will be the capacity of any site to support the delivery of the new local plan’s housing requirement.

3.5. Once an annual figure has been confirmed via the Government’s standard methodology to arrive at the figure for any new allocations WCC would: take into account completions since 2018 (the current start date for the new local plan), existing commitments such as sites with permission under construction, sites with permission not yet started and an allowance for windfalls (sites which come forward on an ad hoc basis). The most up to date position on housing land supply is set out in WCC’s Authorities Monitoring Report (AMR) 2018-2019 for April 2019. The 2019/20 AMR should be published by the end of the year. For the plan period 2018-2038 WCC has identified a supply of 11,151 dwellings; on the basis of the Government’s current advice the annual requirement would be approximately 700 dpa, resulting in a requirement for 14,000 homes, a net addition of approximately 3,000 homes.

3.6. The next step would be to consider what the reasonable options were for allocating land to meet the balance and to test the merits of those options via the Sustainability Appraisal (SA) process. eg a single big site somewhere in the district, a number of large sites or a combination of sites large and small. One would expect WCC to use the Issues and Options stage of the plan process to set out the range of options for the public to comment on before deciding upon a preferred approach.

***Delivery of allocations***

3.7. Local Planning Authority’s (LPAs) at present are required to ensure that they have a five-year supply of housing land (5x the annual housing figure). In circumstances where they cannot demonstrate such a supply, they will be under pressure to grant planning permission on sites they would otherwise want to resist or potentially lose planning appeals. This means that the delivery of sites allocated in local plans becomes an important consideration and WCC would want to be as certain as it can be that any allocations it proposed would come forward within the plan period and deliver the number of completions assumed.

3.8. In preparing its new local plan WCC will need to be mindful of the emerging housing land supply position and look to a housing strategy which had a positive impact on future completion rates. WCC currently has in excess of a five-year supply of land which means that it is in a relatively strong position to resist applications on sites it does not favour. With regard to the merits of allocating a site of the size proposed at Hursley it is worth noting that the supply of homes for the period 2019/20-30/31 is 10341 of which 58% is located on three large sites (west of Waterlooville, North Whitely and Kings Barton). In addition, the annual rate of completions for the whole District starts to decline from 2024/25 falling below 700 dpa in 2028/29. Any slippage on the three strategic sites could mean that WCC could be in significant land supply difficulties in the later years of the 2020s assuming an annual requirement of approximately 700 dpa (see para 3.2 above).

3.9. Allocating a large site of 5,000, such as the one at Hursley, is unlikely to be one which would improve its position in the medium term and would potentially expose the District as a whole to planning by appeal.

3.10. Large sites across Hampshire and indeed the rest of England invariably take much longer to deliver than the initial estimates used to inform the decision-making process. A report ‘Start to Finish’ by the consultants Lichfields (February 2020) highlighted the issue of delivery in respect of large sites. Their research showed that for large sites i.e. more than 2000 dwellings it took between 5-8.4 years to deliver completions after the submission of an outline planning application.

3.11. The rate at which new homes are delivered was examined by the report. It looked at the rate of completions achieved on large sites of over 2000 homes and concluded the average annual rate was 165 dpa.

3.12. The issue of the rate of completions was considered in detail at the examination of the North Essex Shared Strategic Plan. The inspector in his letter to the three authorities of May 2020 took account of the detailed evidence presented including the Lichfields report and report by the Homes and Communities Agency and concluded that at best 250 dpa could be achieved in respect of the three new settlements being proposed.

3.13. Local experience provides further evidence of the record of large sites delivering lower annual completions than originally projected. West of Waterlooville (1679 dwellings) is expected to deliver approx. 200 dpa, North Whiteley (3,500 homes) is expected to achieve 300 dpa but only in year six and Kings Barton (1823 homes) is expected to achieve 115 dpa. Ref WCC AMR 2018-2019.

3.14. In comparing the findings of the Lichfields research and local experience the proposed rate of delivery set out in the WCC SHELAA site HU02 (which is within the Royaldown site) looks optimistic in the extreme i.e. 2500 homes in years 0-5 and 2734 in years 6-10. Large sites have a long lead in time and even when construction starts, subject to the number of individual house builders involved, there is usually a small number of completions in the first year or so building up to a steady annual rate which is maintained, subject to market conditions, and then tailing off. The Lichfields report concluded that it took around five years after the development started before completions began to ramp up.

3.15. How many completions could be achieved by the proposed scheme within the plan period to 2038 will be a key consideration for WCC. Assuming the new local plan was adopted in 2023/24, subject to level of detail in the local plan ie a separate site development plan document might follow and that the site was allocated it would be reasonable to assume it would take until 2030 to have the necessary consents to be in a position to start on-site. The provision of infrastructure for such a large site will also have a long lead-in time which in combination with the planning process would suggest that the number of completions achieved by the end of the plan period of 2038 would be relatively small compared with the assumptions made in the SHELAA. In this scenario, the Council, if it was relying on this site to deliver a significant number of completions would have a significant delivery issue during period 2018-38 exposing it to the risk of planning appeals on other sites across the District.

3.16. The reforms published in the White Paper and the consultation paper Changes to the Current Planning System propose to remove the requirement for a five-year supply of land. However, it is proposed to retain the Housing Delivery Test which would maintain pressure on local planning authorities to deliver new homes. given the Government’s continued pressure on them to meet its overall housing target of 300,000 dpa.

**4. Merits of new communities/new neighbourhoods/garden villages*.***

4.1. The National Planning Policy Framework (NPPF) 2019 advises that the supply of large numbers of new homes can often be best achieved by planning for larger scale development such as new settlements , provided that they are well located and supported by the necessary infrastructure. The NPPF sets out five criteria (ref para 72) when considering the merits of new settlements: opportunities presented by existing or planned infrastructure; of a scale to support a sustainable community with access to services and employment within it or on larger towns where there is good access; high quality development; a realistic assessment of likely rates of delivery and consider if appropriate to establish a Green Belt around new developments of significant size.

4.2. In 2018 the Government published its Garden Communities Prospectus. The document advised that such communities should be holistically planned and of a scale to be largely self-sustaining with the necessary infrastructure for it to function self-sufficiently on a day to day basis.

4.3. The purpose of planning is to achieve sustainable development. The Government, in the recent White Paper, has re-affirmed its commitment to delivering sustainable development by proposing a statutory sustainable development test for local plans. in passing the new test it will be reasonable to assume that any development proposed within the local plan would need to demonstrate that it was sustainable.

4.4. New settlements are seen by their promoters as an opportunity to develop sustainable communities however a recent report, Garden Villages and Garden Towns, Visions and Reality by Transport for New Homes (2020) suggests that delivering self-supporting communities is proving to be quite a challenge. The report concluded that the current garden community schemes reviewed remained car dependent, that they were unlikely to be self-sustaining and that securing funding and delivering the public transport infrastructure and services which were central to the garden village /community approach was proving extremely difficult.

4.5. The following paragraphs review the merits of Royaldown against the criteria set out in the NPPF

***opportunities presented by existing or planned infrastructure;***

4.6 .The brochure does not refer to any existing of planned infrastructure which the proposed development would take advantage of and it is therefore to be assumed that the scheme will fund the infrastructure necessary to deliver the new community.

4.7. The proposed development will require a significant investment in infrastructure and it would appear to be the intention that it will fund what is required including: two primary schools and a secondary school, two local centres, a GP facility, Green Infrastructure including a country park and extensive woodland and planting. The development would be served by a new west-east road from a new roundabout at the junction of the A3090/Poles Lane to a new junction with Badger Farm Road. There is no reference to water supply and wastewater but a development if the scale proposed is likely to require significant investment in the existing infrastructure.

4.8. No details of the phasing of provision is provided. However, on page 4 the brochure states that the major infrastructure necessary to support a new community will be delivered at the start of the process, including the facilitation of the proposed link road. This could have a significant impact on the rate of delivery of any new homes.

***of a scale to support a sustainable community with access to services and employment within it or on larger towns where there is good access;***

4.9. NPPF, para 72b advises that that, in establishing new settlements, one should not expect an un-realistic level of self-containment. However, the 2018 Prospectus is quite clear in that they should be largely self-sustaining with the necessary infrastructure for it to function self-sufficiently on a day to day basis.

4.10. The proposals include an employment area of 13ha located some distance to the east of the proposed housing areas at Compton Down adjoining Badger Farm Road alongside the proposed park and ride, commercial hub and solar farm. As presented the employment proposals are distinctly separate from the proposed garden village linked only by the proposed new road approximately 2km from the centre of the housing development.

4.11. To be considered a sustainable community it would be reasonable to expect a significant number of jobs to be located within the garden village. For example, 5,000 jobs would be needed to be provided to enable at least one person from each household to live and work locally. The number of jobs which would be created is not clear, of those that were, most would be located outside the garden village development itself.

4.12. The development is proposed to be served by a range of services and facilities including education, health and community facilities, cultural, sport and recreation facilities. The Transport for New Homes research suggests that delivering the facilities envisaged at the outset of proposals for new settlements is a major issue and it is by no means certain that those proposed would be delivered. See paras below

4.13. The centre of the scheme is located 5 Km south west of the centre of Winchester, via the existing road network and it is reasonable to assume that residents of the proposed development would look to the City for most of its needs such as health care, further education, retail and leisure. To be consistent with the principles of garden communities a significant proportion of those journeys to those destinations should be by modes other than by car. However, the potential for such journeys is considered limited.

4.14. The proposed access arrangements centre on a new route into the City via Badger Farm Road either via the A3090 Romsey Road or St Cross Road. Both roads are well-used particularly at peak times and do not provide a particularly attractive route for cyclists, given the road conditions, and there is little scope for improvements. The proposal to designate Port Lane as a cycle route whilst providing a traffic-free route to the edge of the City does not address the issue of the quality of the journey into the City or key destinations such as the rail station. The rail station at Shawford is cited as providing the potential for none-car trips. ref page 28. The Station is approximately 6km away and access to it via cycle or public transport would be via the proposed new road and either Poles Lane or Badger Farm Road which are not considered to be particularly attractive to commuters.

4.15. The proposed access arrangements would mean buses exiting the site onto Badger Farm Road and then into the City via the A3090/Romsey Road or St Cross Road which are the main routes from the site into Winchester currently experiences significant congestion at peak times. The scope for any significant improvements for buses to make them an attractive alternative to the car appears to be very limited.

4.16. The location of the site close to the junction of M3/A3090 will be a concern to Highways England in respect of the impact on the strategic road network. The proximity of the motorway is likely to encourage longer-distance out commuting which would run counter to the aims of promoting sustainable development. The brochure highlights the relative proximity of the motorway on a number of occasions which appears to be a recognition that residents will commute to other destinations by car.

4.17. In respect of internal movements garden communities should be designed as walkable neighbourhoods and to promote non-car trips within it. However, the 2 schools and the main local centre are located at the north eastern boundary of the site, such that many residents in Oliver’s Battery would be closer to them than a significant number of those living within the new development. To encourage no-car movements within the development one would have expected the major facilities to be located more centrally within the site.

4.23. The garden city approach to accessibility is one of an integrated and accessible transport system for walking, cycling and public transport designed to be the most attractive forms of local transport. The proposed approach is very much based on the new road from Poles Lane to Badger Farm Road.

***high quality development;***

4.24. The intention of the promoters to develop a site of high quality is set out in the brochure eg page 14 and page 20 supported by a delivery model which seeks to control the form of development ref page 4. Such an approach if implemented does have the potential to provide control over the quality of development and is a model proposed elsewhere.

***a realistic assessment of likely rates of delivery***

4.25. The brochure does not set out in detail proposals for the phasing of the development other than to state that it would be in two phases of 3,000 homes and 2,000 homes respectively. It is not clear which phase the proposed employment land would be developed ref page 14. The promoters of the site are committed to delivering the major infrastructure necessary “at the start of the process” and this will include the “facilitation” of the new link road. The use of the term suggests that the promoter is at this stage not committing to building the road at the start of the development. No definition is provided for major infrastructure but in terms of delivering a sustainable community it would be reasonable to expect it to include the local centre, the primary schools, the community and leisure facilities and investment in the infrastructure to encourage non-car modes of transport.

4.26. In the context of the delivery rates achieved on large sites elsewhere in the District and the country, see paras 3.7 - 3.14 above, it is reasonable to assume that there would be a long lead-in time for the proposed development which would be a significant factor for WCC when considering the merits of the site for inclusion in its new local plan

4.27. Setting aside the impact of providing the major infrastructure at the start pf the process on the viability of the project the lead-in times for putting it in place will have a major impact on the timing of the first completions. In particular it would appear that the scheme is reliant on the link road being constructed to enable access to the site for construction purposes. However, the use of the terms ‘facilitation’ introduces uncertainty in respect of how and when the road would be delivered.

consider if appropriate to establish a Green Belt around new developments of significant size.

4.28. A green belt is not proposed as part of the development, such a designation would be a decision for WCC.

**5.Local Site Considerations**

5.1 This paper has focussed on the broad principles of delivering a garden community and the issues that arise in respect of the propose development. There is scope to undertake a more in-depth review of the details of the proposal. A number of initial concerns are raised below.

***Landscape impact***

5.2. The site is located with the downland south west of Winchester which forms an important element of the setting of the City. On the south-western boundary of the City development extends up the western side of the Itchen valley but does not spill over the ridge line with the exception of the Oliver’s Battery. The proposed development would extend approximately 2km south westwards along the dry valley floor and slopes to the village of Hursley. It is part of an extensive area of countryside separating Winchester from Hursley which is undisturbed by limited development comprising farm buildings, isolated dwellings. From the high ground on Millers Lane there are extensive views to the north east and south west.

5.3. The promoters of the site propose to locate all of the residential development and associated facilities within the dry valley leading to Hursley from Oliver’s Battery which would appear to be in recognition of the adverse impact on the landscape that development would have.

5.4. The proposed solar farms are located outside of the valley between Hursley and Oliver’s Battery. The largest on the rising land north of the A3090 would have a significant impact on the landscape and the setting of Farley Mount.

5.5. Extensive areas of new woodland are proposed which would have a significant impact on the character of the area which is one of rolling downland with numerous small areas of ancient woodland, plantation woodland and tree belts ref WCC Landscape Character Assessment 2004. The proposed planting along the eastern boundary of the A3090 north of Hursley stretches for approximately 2.5Km to Millers Lane and along the Lane to the new road at Yew Hill.

***setting of Hursley village***

5.6. The extent of the proposed development would effectively extend the City boundary south west to include Hursley. It would have a significant impact on its setting. It has been designated as a conservation area and includes a number of listed buildings. The area is not designating as one where coalescence is an issue but clearly this would be the case if the proposal came forward.

5.7. The scale and form of the development is not sympathetic to the existing settlement pattern of the area which is one of small rural settlements located in a linear form along highways.

5.8. The proposed commercial hub, park and ride and employment area are located within the designated settlement gap between Winchester and Compton ref Policy CP18 of the Winchester Local Plan.

***ground conditions***

5.9. The area around Horsley has a history of flooding from ground water with a number of examples in the 2000s. The proposed development is located above the village and the land drains to west through it. The water courses south of the village drain into the Monks Brook which flows through Chandlers Ford and is prone to flooding.

**6. Conclusion**

6.1 The proposals for the development are predicated on there being a need for a significant number of new homes to be provided by WCC in its next local plan. The promoter considers that the land at Hursley represents the best location to meet the future housing need at Winchester.

6.2 In the absence of the strategic housing need of the District being established and a detailed appraisal of the potential options to meet that need it is premature to conclude that the current proposal in planning terms represents the best option.

6.3 The case for the site to deliver a scheme which can be considered to be sustainable and to be considered as a “garden village” in the terms expressed by the NPPF has not been made for the reasons set out in this paper.

19.11.20