

Examination of the Winchester District Local Plan 2020-2040 (the submitted Plan/the Plan)

Stage 1 hearings Matters, Issues and Questions

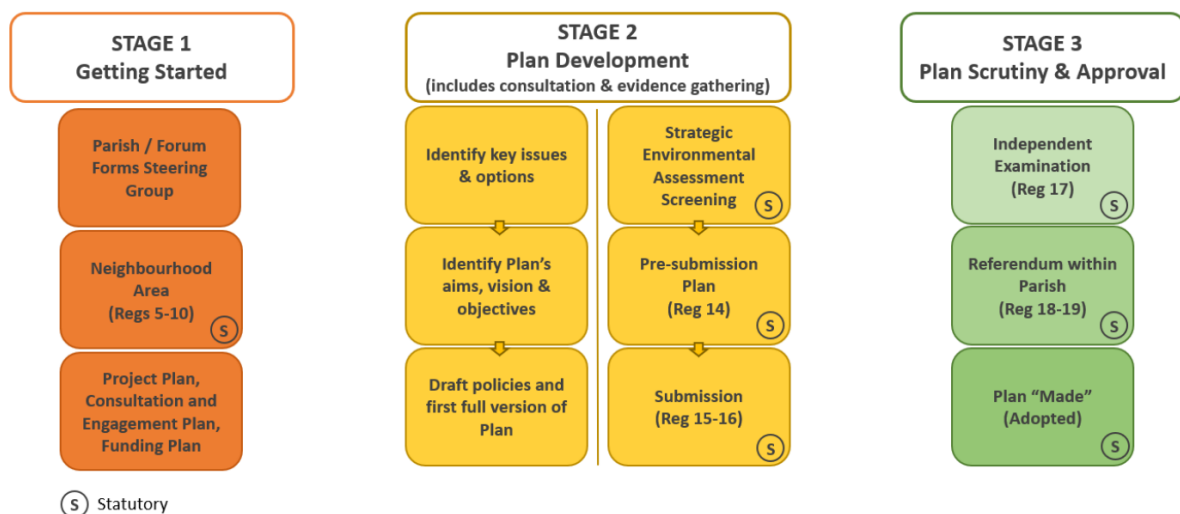
Matter 8 Development Allocations the Market Towns and Rural Areas (MTRAs)
Issue: Whether the proposed housing site allocations in MTRAs would be justified, effective and consistent with national policy?

Denmead **Policy DEN1 Denmead Neighbourhood Plan Designated Area**

1. Denmead Parish Council is updating its Neighbourhood Plan at present. When is the Neighbourhood Plan expected to be 'made'? What is the evidence that it will come forward in an appropriate and timely manner?

This is clearly a question best answered by the Council after they have consulted with the Steering Group, who are preparing the Neighbourhood Plan. However, there is concern that it will not come forward and ultimately be 'made' in a timely manner now the Council has published its Interim Local Development Scheme in February 2025 (ED16). This envisages the Council commencing work on a review of the next Local Plan during Q2 2025. A first publication on the review of the next Local Plan is scheduled for Q2 2026.

A Neighbourhood Plan Timeline image has been published on the Denmead Neighbourhood Plan website - <https://denmeadneighbourhoodplan.org.uk/wp-content/uploads/2024/11/Neighbourhood-Plan-Timeline.pdf>



The Neighbourhood Plan is currently at Stage 2 and there is no published date for the consultation on the Pre-submission Plan (Reg 14). The Examination of the Winchester District Local Plan 2020-2040 may have concluded before the Neighbourhood Plan Pre-submission Plan is even published for consultation. Whilst further away, there is also concern that the Neighbourhood Plan will not have been 'made' before the Council's first consultation on the review of its next Local Plan in Q2 2026.

2. What is the evidence to justify an approach to designate an additional site/sites in the Neighbourhood Plan? What is the evidence to justify the housing target of 100 additional dwellings and would this ensure that development is directed to the most sustainable settlements?

Housing Option 2 is one of three housing options currently favoured by the Steering Group following a public consultation exercise undertaken between 11 October and 6 December 2024. Housing Option 2 proposes 100 dwellings on one large site. Additional sites should be designated within the Neighbourhood Plan.

Bewley Homes Ltd is concerned there is no evidence to justify the low housing target of 100 additional dwellings within Denmead.

There is support for the distribution of development across different spatial areas and the settlement hierarchy which locates housing close to essential services, facilities and infrastructure, helping to achieve a sustainable pattern of development.

Denmead is one of five Larger Rural Settlements in the Regulation 19 Local Plan, but only four of them have new housing allocations. These include Denmead (100 dwellings), Kings Worthy (120 dwellings), Colden Common (90 dwellings) and Wickham and Knowle (300 dwellings). The rationale for the distribution of dwellings among these five settlements is not at all clear.

In the Settlement Hierarchy Report Update August 2024 (DS01), Denmead scores 25 against the list of daily facilities/services plus other facilities on page 20, compared to 23 for Colden Common and Kings Worthy and 26 for Wickham.

According to the Council's Open Space Assessment 2022 (Local Plan Library), Denmead also has a far higher population of 6967 (page 30), compared to 4716 for Kings Worthy (page 38), 4656 for Wickham (page 66) and 3987 for Colden Common (page 22).

The Council's Strategic Housing and Employment Land Availability Assessment (SHELAA) July 2023 (HA04) advises within Table 10 on pages 20-21 on the theoretical capacity of the number of dwellings that could be built in each of the listed settlements. Denmead could have 3984 dwellings built, compared to 3530 dwellings in Wickham, 992 dwellings in Colden Common and 676 dwellings in Kings Worthy.

The Development Strategy and Site Selection Report July 2024 (SD10b) focused on sites within or adjacent to settlements within the SHELAA 2023. Even allowing for this analysis, there were 15 sites within or adjacent to Denmead's settlement boundary which could contribute towards 1,703 dwellings (page 23). This compares favourably to Wickham, which only had 6 sites adjacent to the site boundary contributing towards 957 dwellings (page 25). Kings Worthy has also had 6 sites within or adjacent to the settlement boundary contributing towards 605 dwellings (page 24). Colden Common had 11 sites adjacent to the settlement boundary contributing towards 551 dwellings (page 27). It is evident, therefore, that Denmead has a greater number of sites which could be developed for housing and which lack the constraints associated with many other rural sites within the district.

It is understood that the existence of a delegated approval subject to a s.106 at Land at Ravenswood, Knowle for 200 dwellings (under reference 18/01612/OUT) forms part of Wickham Parish's housing allocation figure of 300 dwellings.

It is considered that Denmead's new housing allocation of 100 dwellings in the Winchester District Local Plan Proposed Submission Local Plan (Regulation 19) 2020-2040 is far too low relative to Wickham (100 dwellings compared to 300 dwellings in Wickham Parish). Denmead's score of 25 for facilities is comparable to Wickham's score of 26, but Denmead has a much higher population relative to Wickham (6967 compared to 4656) and a greater capacity of dwellings that could be built relative to Wickham (3984 compared to 3530) within the SHELAA 2023 (HA04).

Whilst the number of new dwellings required in the district is understood, and recognising the current planning application in Wickham Parish for Land at Ravenswood, Knowle, there is also the option to reduce the number of new dwelling allocation figures in Colden Common and Kings Worthy. This would enable Denmead's housing allocation to be increased to at least 200 dwellings. Neither of these settlements match Denmead when comparing their facilities scores, population or dwelling capacities. It is not clear why Kings Worthy should have a greater housing allocation than Denmead.

Denmead and Wickham were given the same housing requirement of about 250 dwellings in the adopted Winchester District Local Plan Part 2 (Local Plan Library), so the divergence in housing allocation requirements in the Proposed Submission Local Plan (Regulation 19) 2020-2040 is bemusing.

Bewley Homes Ltd is concerned with the lack of mechanisms in place to enable the new housing allocation figure for Denmead to be increased.

3. What is the evidence that there are suitable sites available for designation? Would this approach provide the necessary certainty for the development plan process? In taking this approach would the Plan accord with a Plan led approach?

There is evidently a number of promoted sites within the Council's SHELAA (HA04) (49 in total) so that Denmead could easily support a higher housing allocation.

The AECOM Site Options and Assessment Report was published in July 2024 to inform the preparation of the new Denmead Neighbourhood Plan - https://denmeadneighbourhoodplan.org.uk/wp-content/uploads/2024/08/Denmead-Site-Assessment-and-Options-Final-Report-July_20241.pdf

This Report advises within the Executive Summary (pages 7-8) that there were 19 sites (out of 49 in total) potentially suitable for development and therefore appropriate for allocation within the neighbourhood plan, subject to the mitigation of constraints. One of these sites is being promoted by Bewley Homes Ltd under SHELAA reference DE14 – Land at Forest Road & Furzeley Road, Denmead.

The current designation of only one site for 100 dwellings (housing option 2) is flawed and more sites should be allocated to support a higher housing figure for Denmead of at least 200 dwellings. All the four housing sites within the existing 'made' Neighbourhood Plan have come forward for development, with planning applications approved on three and one refused on the fourth, which will be subject to a future planning appeal.

There is little risk in allocating more than one housing site within Denmead, when several sites have been allocated before and each of them has come forward for development.

4. What is the justification to phase development delivery until after 2030 and would this be justified by the evidence?

There is no justification to phase development delivery until after 2030, just because the current 'made' Denmead Neighbourhood Plan covers the period 2011-2031. By 2030, the Council may have approved its next Local Plan which will need to address the additional housing requirement resulting from the publication of the standard methodology and updated National Planning Policy Framework in December 2024. The application of the final standard methodology requires the Council to provide 1157 dwellings per annum, or an increase of 71.2% on its previous requirement.

The next Local Plan will likely include further housing allocations within Denmead and so there would be an even greater lag of housing sites waiting to come forward and to be built out were delivery to be phased until after 2030.

The intention to phase delivery until after 2030 is at odds with the Government's plans to significantly increase housebuilding and meet its target of 1.5 million new homes by 2029.

5. If the Neighbourhood Plan was not made in a timely manner, how would the housing shortfall be made up? Extant Neighbourhood Plan allocations have yet to deliver what is the evidence that they will deliver in the Plan period (28 dwellings)?

If the Neighbourhood Plan was not made in a timely manner, there is a risk of speculative housing applications being submitted, especially if there is concern that the Council cannot demonstrate a 5-year housing land supply on an ongoing basis.

The table under paragraph 14.83 in the Regulation 19 Local Plan should include updated figures for 2024. It is not clear why the two remaining undeveloped housing allocations in the 'made' Denmead Neighbourhood Plan (Policy 2: Housing Site Allocations ii and iv) are given a figure of 28 dwellings in the same table. These two allocations propose about 20 dwellings and 10 dwellings respectively.

An application for 11 dwellings on Land at The Elms, Tanners Lane, Denmead (part of housing site allocation 2 ii within the 'made' Neighbourhood Plan) was refused

planning permission on 12 December 2024. The applicant (site promoter) will appeal the decision under reference 24/00337/FUL in due course.

As part of the Council's consideration of the application, a masterplan identifying 17 dwellings in total across the whole allocation was accepted, with a shortfall of 3 dwellings compared to the housing allocation of about 20 dwellings.

Another application for 4 dwellings at 65 Anmore Road, Denmead (part of housing site allocation 2 iv) was granted planning permission on 12 December 2024 under reference 24/01697/FUL. There would be a current shortfall of 6 dwellings compared to the housing allocation of about 10 dwellings.

As the Neighbourhood Plan period is supposed to cover the period 2011-2031, it is not inconceivable that the remaining extant housing allocations will deliver the about 30 dwellings by the end of the Neighbourhood Plan period. The emerging Local Plan is also due to run through to 2040 and so there is still plenty of time for the extant allocations to deliver the about 30 dwellings in full.

6. Should policy DEN1 address off site infrastructure needs? Would it be necessary for the purposes of soundness to address the requirement to liaise with water and waste water providers?

No comment.