

WINCHESTER LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Personal Reference Number: ANON-
AQTS-32G7-V

Representor: Bargate Homes

Matter: 2

Spatial Strategy and Distribution of
Development Policies (SP1, SP2, SP3,
H3, E2)

Date: April 2025

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1.0 Introduction

- 1.1 This examination Hearing Statement has been prepared by tor&co on behalf of Bargate Homes (Personal Reference Number: ANON-AQTS-32G7-V) in respect of **Matter 2 – Spatial strategy and distribution of development Policies SP1, SP2, SP3, H1, H2, H3, and E1 and E2** of the Winchester Local Plan examination in public.
- 1.2 The comments made within this Statement respond directly to the questions set out in the Planning Inspectors Stage 1 Matters, Issues and Questions (ID13), and are presented in the context of the ongoing promotion of Land to the west of Salters Lane (SHLAA ref. SP01), Land at Main Road, Colden Common (SHLAA ref. CC04), Land at Lower Moors Road, Colden Common (SHLAA ref. CC05), Land South of Forest Road, Denmead (SHLAA ref. DE05), Land at Forest Farm, Waltham Chase, Shedfield (SHLAA ref. SH09), Land at Lower Chase Road, Waltham Chase, Shedfield (SHLAA ref. SH11), and Mayles Farm, Mayles Lane, Wickham (SHLAA ref. W124).
- 1.3 This Statement should be read in conjunction with the Bargate Homes Regulation 19 representations.

2.0 Response to the Inspectors Questions

Issue: Whether the spatial strategy and distribution of development is positively prepared, justified, effective and consistent with national policy.

Q1. The Settlement Hierarchy Review (2024) scores settlements and groups them which provides the settlement hierarchy in the District. Is the methodology used robust and the outcomes accurate? Is the distribution of development between the tiers of settlements justified and how has it been established?

- 2.1 Bargate Homes note the conclusion of the Settlement Hierarchy Review (2024) that Winchester City represents by far the highest rated settlement in the district, with an overall score of 35. This is based on the large number of facilities and services, including ‘higher order’ facilities, and it is further highlighted that no other settlements in the district are comparable to Winchester in terms of the range of facilities and services they provide, and is the most sustainable development location in the district. Accordingly, Bargate Homes consider the Settlement Hierarchy Review (2024) to be robust and represent an accurate basis for plan making.

Q2. Is the spatial strategy and settlement hierarchy as set out in Strategic policy SP2 justified as an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence?

- 2.2 Whilst Bargate Homes agree with the principle of supporting the delivery of new housing and economic growth across the three spatial areas outlined in Policy SP2, the wording of Policy SP2 as currently drafted in the Regulation 19 plan is considered to be unsound and does not align with the evidence base.
- 2.3 Part i) specifies provision for 5,640 new homes in Winchester City, however this principally comprises existing allocations and commitments, and a disproportionate reliance on a select few large allocations and windfall sites.

Only 1,110 homes are to be provided through new allocations, representing just 20% of the proposed spatial allocation for Winchester City. This cannot be characterised as presenting a significant boost in the supply of land for housing.

- 2.4 An over-reliance on sites already contained within the old adopted plan does not represent an ambitious or positive approach for Winchester City and its role in providing for current and future development needs, particularly in light of its position at the top of the settlement hierarchy. It also leads to the unjustified approach of seeking to manipulate delivery such that the trajectory can be balanced out (as set out in the Housing Topic Paper in relation to phasing). The reality is that these previously planned developments were needed and should have been completed years ago, but they continue to deliver now due to the delays incurred. This approach is wholly inadequate in the face of the significant scale of unmet need arising from the Partnership for South Hampshire (PfSH) area and affordability challenge.
- 2.5 With respect to affordability, there is a chronic issue within the district, set out in the Strategic Housing Market Assessment (SHMA) (July 2024). Relying on existing allocations will not be sufficient, and will further compound the district's affordability pressures.
- 2.6 NPPF paragraph 82d) states that *'planning policies should (be)...flexible enough to accommodate the needs not anticipated in the plan.'* This is considered particularly relevant to the growth requirements and potential of Winchester City. The development strategy for the City needs to meet the needs of the whole community and equally ensure that the *'local economy builds on its existing and growing strengths in higher education, creative and media industries, and other knowledge-based activities.'* Ensuring that there is sufficient housing supply to support Winchester City's economic potential is therefore essential, and needs to be reflected in the draft local plan's spatial strategy. NPPF paragraph 11 states that *'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.'* This particularly applies to the proximity of Winchester City to the South Hampshire Urban Areas and the need to fulfil the PfSH strategy. Consequently, the plan should maximise opportunities to deliver housing across the district, especially around Winchester City which represents the district's most sustainable settlement.
- 2.7 Given the availability of sustainably located and suitable land within the district (as demonstrated by the SHLAA), WCC should consider allowing for additional development, beyond that set out in the emerging plan, during the plan period to meet the unmet needs of neighbouring authorities, to guard against and provide flexibility for any non-delivery on allocated sites, and to better address the acute affordability challenge.
- 2.8 In conclusion, the plan should set a much higher housing requirement, which reflects positive opportunities and available capacity. Bargate Homes do not consider the plan, as currently drafted, is based on sufficient evidence in relation to housing supply and delivery assumptions. Accordingly, it should allocate all deliverable sites in sustainable locations, in accordance with the settlement hierarchy and opportunities to access services, facilities and sustainable travel options.

- 2.9 In stipulating a target for new homes in each spatial location, any such target must not be considered as a maximum, but a minimum. The policy wording should be clear that these are minimum targets.

Q3. Is the proposed distribution of housing and other development supported by the evidence in the SHELAA, settlement hierarchy, and IIA, and will it lead to an appropriate pattern of housing and economic growth?

- 2.10 The proposed distribution of housing does not fully align with the evidence in the SHELAA, Settlement Hierarchy Review (August 2024), and the Integrated Impact Assessment (IIA) (July 2024).
- 2.11 The housing distribution for Winchester City, despite being recognised as the principal focus for growth in the district, is primarily comprised on existing sites, allocations, an overreliance on Windfall sites and the allocation at Barton Farm. Notwithstanding the significant growth potential in and around Winchester City identified in the SHELAA, this is not reflected in the proposed housing distribution. Noting the availability of sites across the district, as promoted and assessed through the July 2023 SHELAA, which identifies a capacity of 62,359 dwellings across the district, the evidence is that far more could and should be done in Winchester to meet the Duty to Cooperate and in order to find the plan sound. It is further highlighted that the 2023 SHELAA identified 34 sites within or adjacent to the boundary of Winchester City. Together, these sites have an estimated capacity of 5,589 homes.
- 2.12 This is further reflected in the Settlement Hierarchy Review (August 2024) which confirms Winchester City to be, by far, the highest rated settlement in the district, with an overall score of 35. In recognition of the role of Winchester City in the settlement hierarchy, the housing need and spatial housing distribution, full use of available opportunities for the allocation of new sustainable, edge of settlement, development opportunities should be taken forward. This includes the opportunity at Land at Salters Lane, which is favourably placed on the edge of Winchester City.

Integrated Impact Assessment (IIA)

- 2.13 With reference to the opportunity at Land at Salters Lane, Winchester, it is noted that there are several concerns raised regarding the IIA and how it has been applied. Critically, it is highlighted that the assessment remains the same as at Regulation 18 stage, notwithstanding the extensive supporting evidence provided through submitted representations to date. This is a clear indication that the IIA has not been updated, nor is it responsive to site specific evidence, and its conclusions therefore should not be relied upon to inform the spatial distribution of housing. Under the Natural resources category for example, the site is assessed as 'significant negative' notwithstanding the extensive landscape appraisal work undertaken. A zone of theoretical visibility (ZTV) has been undertaken which confirms that the ZTV of the proposals at Salters Lane would be very limited due to both topography and existing vegetation. It is further emphasised that the site has been directly informed by its setting and location, and there is no acknowledgement of the potential for landscape and biodiversity improvement and enhancement. This notably includes the addition of new native woodland planting and publicly accessible open space to the benefit of the wider community.

- 2.14 On the basis that there has been no change in the assessment between the Regulation 18 and 19 stages therefore, it is apparent that neither the landscape appraisal or ZTV have been given due consideration as part of this assessment, and cannot be relied upon to accurately inform the proposed spatial strategy. It is further noted that Land at Salters Lane has been given a comparable IIA rating to the allocated site, Sir John Moore Barracks, which has been similarly assessed as significant negative for 'Biodiversity and Geodiversity' and 'Natural resources' according to Appendix F, and is also located to the north west of Winchester Town. For details regarding Bargate's other land interests/promoted land in other settlements, namely Colden Common, Denmead, Waltham Chase and Wickham, please refer to the separate Statements prepared on Bargate's behalf. This indicates a clear inconsistency in how the IIA has informed the proposed distribution of housing in the Regulation 19 plan.

Q4. Have settlement boundaries been defined in accordance with a clear and easily understood methodology that is consistently applied?

- 2.15 Bargate Homes consider that settlement boundaries have not been defined in a consistent or clear manner, and the current approach does not give due regard to national policy priorities and policy expectations. The NPPG emphasises the need for plan makers to be proactive in identifying as wide a range of sites as possible, as well as broad locations for development. NPPF paragraph 20 requires Local Plans to identify an appropriate and sustainable strategy for the pattern and scale of development, including housing. Equally, national planning policy stipulates that new development should be distributed to reduce travel and encourage more sustainable modes of travel.
- 2.16 The current proposed approach under Policy SP3 of defining development in the countryside as simply land outside of settlement boundaries will restrict the ability for sustainable development opportunities adjacent to existing settlements to come forward. As outlined in the Development Strategy and Site Selection document (July 2024), *"Winchester is the highest rated settlement in the hierarchy review as it contains a large number of facilities and services, including 'higher order' facilities. No other settlements in the District approach Winchester in terms of the range of facilities and services they provide, so Winchester is at the top of the settlement hierarchy and is the most sustainable development location in the district."* In this context therefore, the wording of Policy SP3 as currently drafted does not acknowledge or reflect the growth potential of Winchester City specifically, nor its relative position within the settlement hierarchy. According to the overly restrictive stance contained in this policy, sustainable development opportunities adjacent to the settlement boundary of Winchester City are afforded the same policy status, as sites adjacent to small rural villages. This does not represent a sound basis upon which to take forward the local plan, and equally constrains the flexibility and responsiveness of the new local plan.
- 2.17 Particularly in the context of Winchester City therefore, in light of its dominant position within the settlement hierarchy, and the pressing housing need, there is a clear case for an up-to-date and consistently applied review of the settlement boundary to be undertaken. According to the 2023 SHELAA, there is a total capacity of 5,589 homes within or adjacent to the settlement boundary, emphasising the importance of an up-to-date and consistent approach to the settlement boundary of Winchester City, as well as within the district more broadly. Notwithstanding the clear evidence for a need to review the settlement boundary in contained, sustainable, edge of settlement locations, such as Land

at Salters Lane, or equally, the other sustainable settlements where Bargate's other land interests/promoted land adjoin, in Colden Common, Denmead, Waltham Chase and Wickham. This plan has been progressed without adopting an up-to-date and consistent approach to settlement boundaries.

Q5. Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?

- 2.18 No, the council has not fully considered all realistic options for the distribution of development within the District.
- 2.19 Land at Salters Lane is considered to be well situated to accommodate the growth requirements of Winchester City, as well as encouraging sustainable modes of travel. As set out in the vision document submitted as part of the Regulation 19 representation, the site at Salters Lane aligns with the development to the north and south that currently sits outside the settlement boundary. Consequently, the site's location is considered a natural area for development. Equally, as set out in the separate Statements prepared on Bargate's behalf, there are also many sustainable opportunities in other settlements within the District, including Bargate's other land interests/promoted land in Colden Common, Denmead, Waltham Chase and Wickham.

Q6. Would the Plan's spatial strategy strike the right balance between the need for development across brownfield and greenfield sites and any related impact on housing affordability?

- 2.20 No, the Plan's spatial strategy fails to achieve an appropriate balance between brownfield and greenfield development, particularly in addressing the district's affordability challenges. The plan as currently drafted is considered to be overly reliant on large brownfield sites. These sites have a longer lead-in time, and such sites are typically more complicated and therefore expensive to develop which consequently puts pressure on the levels of community benefit, including affordable homes, that can be sustained without rendering such schemes unviable.
- 2.21 The Strategic Housing Market Assessment (SHMA) (July 2024) provides clear evidence of the chronic affordability challenge within the district. However, the current strategy, which relies heavily on previous allocations with only 25% new allocations, will not be sufficient and will further compound the district's affordability pressures. Additional housing must be brought forward.
- 2.22 Under Policy H6, brownfield sites are required to deliver only 30% affordable housing subject to viability, compared to 40% on greenfield sites which is often challenging. This means that brownfield sites cannot contribute the same level of affordable housing, yet they remain a key focus of the spatial strategy.
- 2.23 Given the priority to deliver affordable housing, there is a disconnect between the reliance placed on brownfield sites, including those that have not delivered any housing to date, and greenfield sites that are more readily delivered and can provide higher levels of affordable housing.
- 2.24 Furthermore, it is noted that Figure 4.1 of the Annual Monitoring Report highlights the overall downward trend for net completions on previously developed land, from 61% in the year 2011/12, to 20% in the year 2022/3. This

clearly shows that further greenfield sites will be required to meet Winchester's needs going forward, given the reduced availability of previously developed sites, with variable capacity, and need for flexibility. This is particularly relevant in Winchester City where reliance on brownfield (i.e. Sir John Moore) is at the expense of suitable greenfield sites. Consequently, the draft strategy needs to be altered so that there is a better balance between greenfield and brownfield sites accordingly. Of the new local plan allocations proposed, only Policy W4 (Courtenay Road) is greenfield, with the remainder partly or fully brownfield (equating to just 9% of dwellings being delivered via new local plan allocations resulting from greenfield sites), clearly illustrating the significant imbalance.