

Winchester City Council Local Plan Examination Hearing Statement Matter 5: Site allocation methodology

April 2025





Matter 5 Site allocation methodology

Issue: Whether the site allocation methodology for proposed housing, mixed use and non-residential site allocations is justified, effective and consistent with national policy?

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Methodology and application

1. How have the proposed allocations been identified?

WCC response:

- 1.1 The Development Strategy and Site Selection Topic Paper (July 2024) (SD10b) sets out how the proposed allocations were identified. Section 2 of that paper sets out how the spatial strategy in the adopted plan evolved through the Strategic Issues and Priorities consultation, and the Regulation 18 draft Local Plan. Section 3 of the Topic Paper sets out how the final quantum of development was determined, and section 4 sets out how the distribution of development was considered through options and refined as the Plan progressed to the Proposed Submission stage.
- 1.2 The process for considering specific allocations is described in section 5 and 6 of the Topic Paper.
- 1.3 First, consideration was given to those allocations in the adopted Local Plan which had not been completed to assess if there was still an intention to develop the sites and that they could be considered developable and be carried forward as allocations into the new Local Plan. These sites had already been found to be suitable and deliverable through the existing local plan process and the presumption was that they should be carried forward unless new issues had arisen that clearly demonstrated that the sites are not deliverable and the site should not be rolled forward into the new Plan. These sites were reappraised in the Integrated Impact Assessment to consider how they scored against a revised Sustainability Appraisal framework and evolving habitats regulations context.
- 1.4 When considering new allocations, the starting point concerning the availability of suitable sites was the 2021 Strategic Housing and Employment Land Availability Assessment (SHELAA). The SHELAA undertook an initial assessment of the suitability, availability and achievability of sites promoted for development in the Plan area. All of the SHELAA sites were assessed through the Sustainability Appraisal as part of the Integrated Impact Assessment. The full scoring of sites is set out in Appendix F of the Integrated Impact Assessment and this helped to inform the shortlisting of sites for inclusion in the draft Regulation 18 Local Plan. An updated SHELAA was subsequently published in 2023.
- 1.5 Prior to the development strategy being agreed, Officers from the city council undertook site visits in order to establish if there were a range of reasonable alternatives. Discussions were also held with Town and Parish Councils regarding the emerging development strategy and potential SHELAA sites to meet the level of development identified. In Winchester, discussions were held with the Winchester Town Forum and neighbouring Parish Councils. The discussions varied in scope and nature, but generally covered the emerging

development strategy, issues relating to planning and development in each parish / settlement, existing development allocations and recent completions, windfall allowances, the availability of sites in settlements identified for potential further development, and any work undertaken to date by the parish council in considering potential development sites and the engagement that the parish council has undertaken with their communities. The Development Strategy and Site Selection Topic Paper (July 2024) sets out detail on the process undertaken by parish councils in responding to the emerging strategy (para. 5.6) and their detailed responses are set out in Appendix 2 to that document.

- 1.6 Responses from Parish Councils were varied. Many of the Parish Councils arranged their own public consultation and as result of this, they were able to nominate one or more sites to meet the level of development identified in the emerging development strategy. Others provided a shortlist of sites or were unable to identify options. While some needed to undertake further community engagement, others were able to provide a view to the council on the basis of previous consideration of the sites. If a Parish Council was unable to nominate a site(s) for consideration, then officers considered the options as set out in the SHELAA and assessed sites for potential allocation.
- 1.7 There was then a period of further assessing the responses and feedback that had been received from the parish and town councils. Sites were considered against a standardised set of considerations. In the first instance, in order to ensure that a site was within easy walking distance to existing services and facilities, potential sites were expected to be adjacent to the existing built form of the identified settlement i.e. not isolated parcels of land. This then led to an initial shortlisting of sites and initial assessments were undertaken of the impacts that developing these sites could have upon the historic environment, transport (highways) and landscape. The outcomes of the Sustainability Appraisal for each site (which included matters such as the proximity of the site to services and facilities) were considered alongside these outputs and any other relevant factors to ensure the most suitable site(s) in each settlement were selected to meet the identified level of development.
- 1.8 An assessment was undertaken to consider if any constraints needed to be addressed in any allocation policy, along with an initial consideration of infrastructure requirements. In some cases, this "bottom up" approach identified issues which led to a refinement of the overall development strategy. In particular, this has led in some instances to no allocation being included in the Proposed Submission Local Plan (Regulation 19) even if the parish council considered some SHELAA sites might be potentially suitable for development.
- 1.9 Following the consultation on the regulation 18 draft Local Plan, there was a period of further work to consider the allocations. This included
 - Consideration of the issues raised in the responses to the Regulation 18 draft Local Plan consultation;
 - Preparation of further evidence on infrastructure capacity and requirements, including transport;

- Updating to take into account any further information received on site delivery and suitability; and
- Liaison with neighbouring planning authorities as appropriate.
- 1.10 Section 6 of the Topic Paper sets out the outcomes of that process in each of the settlements in the Plan area. The Topic Paper explains why new allocations were not identified for the settlements of Sutton Scotney (para. 6.47) and Wickham (para. 6.29) in the Regulation 18 draft Local Plan in 2022, but were included in the Proposed Submission Local Plan (Regulation 19). In those cases, further documents have been prepared setting out further detail on how the proposed allocations for Sutton Scotney (DS02) and Wickham (SD10i) were selected.
- 2. Do they accord with the Plan's spatial strategy as set out in strategic policies SP1, SP2, SP3 and H1, H2, H3 and E1-E3, in terms of the overall provision throughout the District?

WCC response:

- 1.11 Yes. The allocations are in accordance with the Plans spatial strategy. They support the Vision for each sub area set out in policy SP1 and set out how the proposed quantum of development in each of the Plan sub areas in policy SP2, H1, H3 and E2 will be delivered.
- 3. How were the site boundaries, areas and dwelling/other capacities determined? Are the assumptions justified and based on robust evidence? In particular, are the indicative residential capacities, set out in the Plan's site allocations justified by the evidence and consistent with NPPF paragraphs 123 to 126?

WCC response:

- 1.12 The boundaries, areas and capacities of sites allocated for development has been determined through a multistage process.
- 1.13 In the first instance, sites were identified through the SHELAA process. Site boundaries were sought from site promoters to provide clarity as to the extent of available land. An initial assessment of capacity of each site was undertaken, following the approach set out in paragraphs 5.2 to 5.6 of the SHELAA Report.
- 1.14 This includes assumptions on density based on the settlement hierarchy, which in effect resulted in higher densities being applied in Winchester, Whiteley, Bishops Waltham and New Alresford. The outcomes were refined further using a density multiplier, to take account of the range of uses (open space etc) required on larger sites. Paragraph 5.6 outlines how this approach was the subject of a stakeholder consultation in 2018 to test the assumptions. Whilst

- there was some criticism, there were conflicting views on appropriate density levels, and so overall the process is considered to be a pragmatic starting point.
- 1.15 Following that, sites were subject to further consideration. The Development Strategy and Site Selection Topic Paper sets out how initial site assessments were prepared to assess landscape, heritage and transport matters included in Appendix 3 (SD10c). The outcomes of that process, specifically constraints and opportunities identified, informed the resulting allocations. For example, the resulting allocation of land north of Rareridge Lane (BW4) is lower than the initial capacity identified in the SHELAA, in recognition of the adjacent South Downs National Park.
- 1.16 Following that process, the proposed allocation have been tested through the regulation 18 draft local plan consultation, and where necessary the identified capacity has been refined, for example at Land at Courtney Road (W4) and Whiteley Green (SH3).
- 1.17 The Council has been in discussion with the promoters of sites allocated in the Plan and information received on site delivery and capacity is set out in appendix 1 and 2 of this document.
- 1.18 Many of the allocations brought forward from the adopted local plan have outline or full planning consent. In addition, the Council has approved Concept Masterplans for the sites at Bushfield Camp and Sir John Moore Barracks.
- 1.19 In summary, it is considered that this approach has justified the evidence. In accordance with NPPF para. 123, brownfield land has been prioritised though the identification of SHELAA sites subsequent site selection, such as at Bushfield Camp (W5) and Sir John Moore Barracks (W2). In accordance with NPPF para. 124a, the plan has identified mixed use schemes such as at Central Winchester Regeneration (W7) and Newlands (West of Waterlooville) (SH1), and in accordance with NPPF para. 125, the Council has taken the lead in identifying and helping to bring forward land at key regeneration sites such as Central Winchester Regeneration (W7) and Station Approach (W8). Finally, in accordance with NPPF para. 126, the Council has considered whether there was a reasonable prospect of an application coming forward on sites and where necessary has amended the range of uses to encourage that site to come forward, such as in the case of Tollgate House (BW3).

4. How would the proposed allocations provide flexibility in the event that some sites do not come forward?

WCC response:

1.20 The Plan seeks to provide a sufficient balance between allowing for flexibility in the event that some sites do not come forward and providing sufficient certainty for all parties.

- 1.21 For housing, Policy H2 (Housing Phasing and Supply) provides clear criteria for phasing of new greenfield allocations. In the event that there is a district level housing supply shortfall caused by sites not coming forward or delivering housing at a slower rate than anticipated, the policy allows for those sites phased for delivery after 2030 to be brought forward and delivered earlier. These sites are distributed in Winchester Town and eight other settlements in both the north and south of the Market Towns and Rural Area. Therefore if they need to come forward earlier in the plan period they are well located to provide an uplift across the Plan area. Further flexibility is provided by policy H7 on rural affordable housing, which can provide additional housing (though not specifically in response to others coming forward).
- 1.22 For employment, Policy E9 on economic development in the rural area provides for additional sites outside the settlement boundaries to come forward in response to demonstrated local need. Again, while this is not dependent upon allocated sites not coming forward, it does provide some flexibility in that event.

The Council is requested to address the above questions 1-4 in general terms in relation to the proposed allocations.

1. In addition, for each site allocation the Council should provide evidence to justify their delivery within the Plan period.

WCC response:

- 1.23 Evidence to justify the delivery of sites within the plan period is set out in two appendices to this document.
- 1.24 The evidence to justify the delivery of housing allocations and mixed-use allocations including housing is set out in Appendix 1 of this document. For the avoidance of doubt, this information on delivery was included in the updated housing trajectory spreadsheet which forms Appendix 1 of the Council's response to Matter 4.
- 1.25 The evidence to justify the delivery of other allocations is set out in Appendix 2 to this document.
- 2. The Council has set out tables relating to housing supply in each of the settlements within the spatial areas in the 'Development Allocations' section of the Plan. In relation to each spatial area, the Council should provide robust evidence to justify the number of dwellings anticipated to be delivered in the Plan period, including net completions, outstanding permissions, windfall allowance, and development equivalents, Neighbourhood Plan allocations, extant Plan existing commitments, and new site allocations.

WCC response:

1.26 With reference to each of the spatial areas of the Plan, the evidence to justify the number of dwellings anticipated to be delivered in the Plan period is as follows. This relates to the figures in the Proposed Submission Local Plan (Regulation 19), which has a base date of April 2023. Evidence on housing needs and supply has now been updated and is contained in the Council's response to Matter 4, particularly the housing trajectory at Appendix 1 of that response.

Winchester Town

- 1.27 Page 307 of the Proposed Submission Local Plan (Regulation 19) includes a table which sets out the expected supply of dwellings for Winchester Town over the plan period. The evidence for each of the elements in this table is set out below.
- 1.28 The net completions during the period 2020 to 2023 in or adjoining Winchester Town is 879 dwellings. A detailed breakdown of those completions is set out in Appendix 3 of this document.
- 1.29 The outstanding permissions for Winchester Town as of 1 April 2023 is 1,869 dwellings (including Barton Farm and other consents). A detailed breakdown of those outstanding permissions is set out in Appendix 4 of this document.
- 1.30 The windfall allowance for Winchester Town is 1,035 dwellings, equating to 69 dwellings per annum over 15 years. The evidence for this is set out in paragraphs 3.10 to 3.18 of the Windfall Assessment Report (HA07). The Report concluded that this contribution was considered realistic in terms of recent trends (88 dwellings per annum) and generally consistent with previous estimates (65 dwellings per annum).
- 1.31 Student housing is expected to be delivered, with the equivalent of 200 dwellings. The evidence for this is set out in paragraph 7.2 to 7.4 of the Student Accommodation Topic Paper (July 2024) (SD10i), including the receipt of a planning application for 525 bedspaces at Bushfield Camp.
- 1.32 The extant Local Plan allocation at Barton Farm Policy W1 is carried forward. Evidence of the delivery of the remainder of this site is set out in the responses to Matters 4 and 6.
- 1.33 New and updated site allocations are proposed at Sir John Moore Barracks (Policy W2), St Peter's Car Park (Policy W3), Courtenay Road (Policy W4), Central Winchester Regeneration (Policy W7), Station Approach (Policy W8), and Bar End Depot (Policy W9). Evidence for the number of dwellings anticipated to be delivered is set out in the responses to Matters 4 and 6.

South Hampshire Urban Areas

- 1.34 Page 367 of the Proposed Submission Local Plan (Regulation 19) includes a table which sets out the expected supply of dwellings for the South Hampshire Urban Areas over the plan period. The evidence for each of the elements in this table is set out below.
- 1.35 The net completions during the period 2020 to 2023 in Newlands (West of Waterlooville) and Whiteley is 293 and 973 dwellings respectively. A detailed breakdown of those completions is set out in Appendix 3 to this document.
- 1.36 The outstanding number of dwellings under existing permissions at Newlands (West of Waterlooville), Whiteley and Botley as at 1 April 2023 is 1,206 dwellings, 2,560 dwellings and 115 dwellings respectively. A detailed breakdown of those outstanding permissions is set out in Appendix 4 of this document.
- 1.37 There is no windfall allowance for the South Hampshire Urban Areas. Given the nature of the development at Whiteley and Newlands (West of Waterlooville) there is expected to be very little scope for windfall development of any significance. The evidence for this is summarised in paragraph 4.8 of the Windfall Assessment Report (HA07).
- 1.38 Additional capacity for 300 dwellings has been identified at Newlands (West of Waterlooville) under Policy SH1. New sites and additional capacity are proposed to be allocated at Whiteley under Policy SH2 to deliver a further 200 homes. Evidence for the number of dwellings anticipated to be delivered is set out in the responses to Matters 4 and 7.

Market Towns Rural Areas

- 1.39 Pages 389 and 390 of the Proposed Submission Local Plan (Regulation 19) include a table which sets out the expected supply of dwellings for the Market Towns and Rural Area over the plan period. Detailed tables for the settlements of Bishop's Waltham (page 391), Colden Common (page 405), Denmead (page 435), Kings Worthy (page 439), Swanmore (page 447), Wickham and Knowle (page 453), Hursley (page 473), Otterbourne (page 477), South Wonston (page 483), Sutton Scotney (page 491), and Waltham Chase (page 497) are also provided.
- 1.40 The evidence for each of the elements in these tables is set out below.
- 1.41 The net completions during the period 2020 to 2023 in the settlements identified in the Market Towns and Rural Area is 832 dwellings. Details are set out in the table below. A detailed breakdown of these completions is set out in Appendix 3 to this document.

Settlement	Completions 2020-2023 - Dwellings / Dwelling Equivalents	
Bishop's Waltham		340
New Alresford		78
Colden Common		116
Denmead		117
Kings Worthy		36
Swanmore		13
Wickham		118
Hursley		0
Otterbourne		02
South Wonston		24
Sutton Scotney		0
Waltham Chase		8
TOTAL		832

- 1.42 As a point of detail, it is worth noting that there are also a small number of completions outside of these settlements in smaller settlements and countryside in the rest of the and Market Towns and Rural Areas.
- 1.43 The outstanding number of dwellings under the existing allocations and permissions at each settlement is set out in the table below. In addition, outstanding Neighbourhood Plan allocations in Denmead totalling 28 dwellings are also brought forward. A detailed breakdown of these figures is set out in Appendix 4 of this document.

Settlement	Outstanding permissions as at 1 April 2023 - Dwellings / Dwelling equivalents
Bishop's Waltham	225
New Alresford	330
Colden Common	0
Denmead	33
Kings Worthy	11
Swanmore	65
Wickham	88
Hursley	0
Otterbourne	0
South Wonston	2
Sutton Scotney	0
Waltham Chase	9
TOTAL	763

1.44 The windfall allowance for named settlements within the Market Towns and Rural Areas is illustrated in the table below and totals 530 dwellings. This takes account of evidence in the Windfall Assessment Report (<u>HA07</u>) which considered how many dwellings are likely to come forward in various groups of

settlements in the Market Towns and Rural Area. These groupings were based on the adopted Local Plan and do not correspond precisely to the settlement categories in the Proposed Submission Local Plan (Regulation 19), which have themselves evolved as the Plan has been developed. The Windfall Assessment (HA07) also did not attempt to allocate windfall figures to individual settlements, so the windfall figures in the tables for each settlement in the Proposed Submission Local Plan (Regulation 19), should be viewed very much as indicative estimates aimed primarily at showing consistency between settlements at the same level in the hierarchy

1.45 In broad terms, the 12 MTRA settlements in the table below and named in the Proposed Submission Local Plan (Regulation 19), equate to the Larger Villages category in the Windfall Assessment (480 dwellings – para. 5.22) and the MTRA3a Other Named Settlements in the Market Towns and Rural Areas (45 dwellings – para. 5.41). These categories total 525 dwellings and the tables for each settlement on pages 391 to 497 of the Proposed Submission Local Plan (Regulation 19), include an apportioned element of this estimated windfall.

Settlement	Windfall in Settlement Table	
Bishop's Waltham		90
New Alresford		90
Colden Common		50
Denmead		50
Kings Worthy		50
Swanmore		50
Wickham		50
Hursley		20
Otterbourne		20
South Wonston		20
Sutton Scotney		20
Waltham Chase		20
TOTAL		530

- 1.46 New and updated site allocations are proposed in the settlements of Bishop's Waltham (BW1, BW3 and BW4), New Alresford (NA1 and NA2), Colden Common (CC1-CC4), Kings Worthy (KW1-KW2), Swanmore (SW1), Wickham (WK1, WK5 and WK6), Knowle (KN1), Otterbourne (OT01), South Wonston (SWO1), Sutton Scotney (SU01), and Waltham Chase (WC1). Evidence for the number of dwellings anticipated to be delivered is set out in the responses to Matters 4 and 8.
- 1.47 Policies DEN1, NA3 and HU1 set out the proposals for neighbourhood plans in Denmead, New Alresford and Hursley respectively, The evidence to justify this is set out in Matters 4, 8 and also (with regards to the availability of suitable land) the Development Strategy and Site Selection Topic Paper (SD10b).

Appendix 1 – Delivery Evidence for housing and mixed use allocations

See separate document.

Appendix 2 – Delivery Evidence for other allocations

See separate document.

Appendix 3 – Completions 2020-2023

See separate document.

Appendix 4 – Outstanding Permissions as at 1 April 2023

See separate document.