

Winchester District Local Plan (2020-2040)

Hearing Statement Relating to Matter 4 On Behalf of Bellway Strategic Land

April 2025

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Client

Bellway Strategic Land

Date of Issue

4th April 2025

1.0 Introduction

1.1 This Hearing Statement has been prepared on behalf of our client Bellway Strategic Land ('Bellway') and the landowners' agent Ian Judd and Partners in response to the publication of the Winchester District Local Plan 2020-2040 (the 'Plan').

1.2 Representations have previously been submitted to the Council's Regulation 18 and Regulation 19 consultation stages of the Winchester District Local Plan on behalf of Bellway and the landowners' agent; this included documentation which set out the significant planning benefits of the site, which adjoins the settlement boundary of Bishop's Waltham.

Bellway Homes' Interest

1.3 Bellway Homes have a specific interest in land within the Plan area adjacent to Crown Hill House, to the east of Botley Road, Bishop's Waltham, Winchester, SO32 1DQ. Botley Road, the B3035, is a main road into Bishop's Waltham from Botley to the south. The site comprises a single field paddock that is framed by a mature hedgerow interspersed with trees on its northern, eastern and southern boundaries and a modest hedgerow on its western boundary.

1.4 The site measures approximately 2.62 hectares and is currently an undeveloped parcel of land that adjoins the settlement boundary of Bishop's Waltham to the south-east. The site is situated between existing dwellings and the character of the site is influenced by the presence of these dwellings and the urban edge of the settlement to the north.

1.5 The site is sustainably located within walking distance of the town centre and is connected by pavements. The measured walking distance between the centre of the site and the clock tower in the centre of St George's Square is just 395 metres, this being a comfortable, convenient and very sustainable five-minute walk.

1.6 There are bus stops located at St George's Square within 400m of the site providing good connections to Winchester, Fareham and Portsmouth and numerous small settlements between, including Wickham and Swanmore. The site is a sustainable location for development in our view and this site represents a valuable opportunity for a development which would relate very well to the existing settlement.

1.7 The site is shown outlined in red on the aerial photograph below and full details of our vision for the site are contained within the 'Botley Road, Bishop's Waltham Vision Document' that was submitted alongside Regulation 19 stage representations.

- 1.8 The site has not been allocated for development; it is therefore an 'omission site' and we continue to promote it for development because of our concerns that the Plan will not deliver enough homes that the evidence confirms are required.
- 1.9 The site is shown edged in red below, and this helps to show the site's relationship with the town, the high street, the town square and local schools. The aerial photograph shows the recent developments to the north-west of the site that were considered to be developments in sustainable locations despite their location further away from the town centre.



Aerial Photograph Showing the Site Outlined in Red, by Courtesy of Google Maps © All Rights Reserved

This Statement

- 1.10 This brief Hearing Statement has been prepared in accordance with the prevailing planning policy and guidance, in particular the National Planning Policy Framework (NPPF), September 2023 and the Planning Practice Guidance (PPG).
- 1.11 We do not seek to unnecessarily repeat points raised in the representations submitted by Bellway, but we have answered the questions posed by the Planning Inspector in the Matters, Issues and Questions (ED13) where we feel it would be helpful to do so.
- 1.12 Gillings Planning, on behalf of Bellway and the landowners' agent wish to take a full and active part in the relevant Hearing sessions relating to their interests in the site.

2.0 Our Responses to the Matters, Issues and Questions

Matter 4 – Meeting Housing Need

Issue: 1 – Would the overall strategy and provision for housing development be justified, effective and consistent with national policy?

Calculation of Local Housing Need (LHN)

Q1. The Council has calculated LHN using the Government’s standard methodology. That gives a figure of 13,565 dwellings over the Plan period 2020-2040. That figure includes an affordability adjustment to take account of past under delivery. In this regard does the Plan accord with NPPF paragraph 61, which indicates that strategic policies should be informed by a local housing needs assessment conducted using the standard method in national planning guidance (PPG)?

2.1 This is a very challenging point and we expect the EiP will focus on this point. It may be useful to learn from other Local Plan Examinations such as Bournemouth, Christchurch and Poole Council (BCP) and Horsham District Council (HDC) how the Inspector interpreted the wording of Paragraph 61 of the NPPF (December 2023) and whether the inference that strategic policies should be informed by a local housing needs assessment conducted using the standard method in national planning guidance (PPG) – and whether this means the previous standard method or the new standard method that was published on 12th December 2024.

Q2. Is there substantive evidence to demonstrate that it would be appropriate to plan for a higher housing need figure than the standard method indicates in this case as per advice set out in the PPG (Paragraph: 010 Reference ID: 2a-01020201216)?

2.2 It was known, and indeed acknowledged by the Council that a higher level of housing need existed before the Plan was submitted for examination. The Council chose not to respond to the need in a positive manner in our opinion.

2.3 Regardless, given that Paragraph 61 of the December 2023 NPPF states that “the outcome of the standard method is an *“advisory starting-point for establishing a housing requirement for the area”* the Council always had the ability to allow the Plan to do more, and to promote higher levels of growth.

Q3. Are there other relevant factors to be taken into account in calculating the LHN?

2.4 We are in the midst of a housing crisis, with housing affordability in the Plan area at record unaffordable levels, with a staggering 14 times a person's earnings in the Winchester area which is spilling out into the hinterlands, and anywhere between 10 and 14 times a person's earnings required to own a home in the Plan area.

2.5 The Plan must and should do more to bolster the supply of new homes in line with the NPPF.

The Housing Requirement

Q3. In addition, it includes an allowance of 1,900 dwellings to take account of any needs that cannot be met within neighbouring authorities. Given constraints in the District, including within the SDNP, is this figure, which exceeds LHN justified by the evidence?

2.6 As we have stated in our Regulation 19 representations, so not repeated here, we consider that this allowance is still too low; and we remain of the opinion that a higher figure is required and fully justified given the housing evidence.

Q5. In stating an unmet need allowance as opposed to a figure intended to meet the need in each authority, would the Plan be effective? Would it accord with NPPF paragraph 61? If an intended figure were included in the Plan, how should that be expressed (as a percentage or specific numbers)?

2.7 We remain of the view that specific allocations should be assigned to meet the needs of neighbouring LPAs and this way, it can be measured if that unmet need has been resolved (or not) depending if that site comes forward.

Q6. Is there any substantive evidence to demonstrate that there should be an adjustment to the minimum housing requirement to help deliver affordable housing with regard to the PPG (Paragraph: 024 Reference ID: 2a-02420190220), and if so, would that be effective?

2.8 The housing evidence points to a growing housing affordability issue in the Winchester and wider Plan area. The Housing Topic Paper Update (January 2025) is worryingly silent on the issue of affordability. Paragraph 3.17 seems to imply that the Plan doesn't need to allocate more land for more homes because "in Winchester, there is little indication yet that house prices are beginning to fall, however, the rate at which they had historically

been increasing has slowed...” and continues “It is clear that high levels of dwelling completions do not directly influence the affordability ratio, as suggested by some respondents, at least in the short term. At most, these may help slow increases in house prices and might ease affordability in the longer term”.

2.9 We find this statement by the Council quite remarkable, it almost implies that the Council should not bother to plan for housing growth because it might not make a huge difference.

2.10 The Council’s statement shows a total lack of understanding of supply and demand economics, and misses the point that it is years, if not decades of poor delivery of new homes through deliberate throttling of growth which has led to such a pent up demand in the Plan area that yes, it may take a little longer to achieve better housing affordability, but it demonstrates that the Council must do more, and it must do so at pace.

Q8. Taking account of completions since the start of the Plan period, extant planning permissions and other commitments, less than 25% would be delivered by new site allocations. In this regard, would the Plan be positively prepared? Would it be effective, justified and consistent with national policy which aims to significantly boost the supply of homes (NPPF paragraph 60)?

2.11 We remain of the view, as set out at in our Regulation 19 representations, so not repeated here, that such an approach is not effective and fails the tests of the NPPF.

Q9. Would the Plan period accord with NPPF paragraph 22, which requires strategic policies should look ahead over a minimum 15 year period from adoption?

2.12 It is a very tight timeline, and there is a real prospect that the scale of modifications that we consider are required in order to make the plan sound will lead to a delay in adoption and lead to the 15-year time horizon being missed.

The Overall Supply of Housing

Q2. Is the housing trajectory realistic and deliverable? Are there any threats to delivery?

2.13 Yes, significant matters such as nutrient neutrality, wastewater treatment capacity, potable water availability, electricity supply issues, biodiversity net gain, interest rates, the availability of building materials, the availability of a workforce for the construction industry, changes to Building Control regulations and the Building Safety Levy will impact

delivery on some sites. A Plan led system should therefore allocate more sites to allow for these constraints.

Q3. Is the contribution towards housing supply from windfall justified? Is there compelling evidence that they provide a reliable source of supply in accordance with NPPF paragraph 72?

- 2.14 As stated in our Regulation 19 representations, and not repeated here; we have expressed major concerns regarding the windfall allowance. We note the Council's continued reliance on the 2021 Windfall Assessment Report and we expect that the EiP will focus on the recent trends in windfall allowances that have occurred since nutrient neutrality and BNG have become considerable constraints to the delivery of development.
- 2.15 A more positive and plan led approach to providing Bishop's Waltham with the homes that it needs would be to allocate additional sites to provide a buffer, and more certainty, as opposed to relying on windfalls that are constrained by Policy SP3.
- 2.16 We discuss this point further in our Matter 5 Hearing Statement.

Q4. In broad terms, is the housing development proposed in the Plan and set out in the trajectory based on a sound understanding and robust evidence?

- 2.17 We note that Question 6 on Page 9 of the Matters, Issues and Questions states:
- 2.18 *"...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."* Underlining is our emphasis.
- 2.19 This is, in our opinion, proof that further work should have been prepared before the Plan was submitted for examination, and proof that the Plan was rushed through and not based on a sound understanding and robust evidence.

Q5. Policy H2 holds back permissions for new greenfield site allocations until 2030 to prioritise previously developed land, achieve a more even housing trajectory and level of development over the Plan period. What would be the expected impacts on housing land supply, 5 year housing land supply, delivery of a variety of sites and matters such as

nutrient mitigation and thereby nutrient neutrality requirements and electricity grid capacity?

- 2.20 As we have set out above in response to Q2, there are many barriers to development on both greenfield and brownfield land that often take time to overcome, and so we remain very concerned that the phasing of greenfield developments to the back end of the Plan period would result in suppressed housing delivery on all land because we anticipate brownfield sites will stall, and even greenfield sites may not deliver in time.

Five Year Housing Land Supply

Inspector's Comment. In the Council's Housing Topic Paper Update (ED02) it states that the Plan is able to demonstrate a five year housing land supply on adoption of 6.7 years against an annual requirement of 679 dwellings home per annum (2025-2031).

Q1. Will the Plan provide for a five year supply of specific deliverable housing sites on adoption with specific regard to the definition of deliverable in NPPF annex 2?

- 2.21 A recent appeal decision suggests that this matter is not so clear cut and perhaps suggests that the Council's understanding of housing land supply is flawed; and perhaps the Council's failure to fully understand the housing position in the Plan area is why the Council lost the appeal.

- 2.22 Appeal Decision reference APP/L1765/W/24/3350662 dated 31st March 2025 relating to Land south of School Lane, Denmead contains an up to date picture of the housing crisis in Winchester and confirms that the Council does not have a five-year supply of land for new homes. Under a sub-heading entitled "The Framework – Housing Land Supply" paragraphs 32 to 35 state:

32. The Framework, published in December 2024, sets out that its new five year supply provisions should take immediate effect and include a revised standard methodology for calculating housing needs, along with the need for an appropriate buffer. As set out in Appendix 3 of the Addendum Statement of Common Ground, the Council acknowledge that the annual requirement under the Framework is for 1,157 dwellings per annum. As an illustration of the vast difference, the housing figure under the current development plan, which is over five years old, is for 676 dwellings per annum. The Council have also sought to justify a 5% rather than 20% buffer and I find no reason to disagree with this approach. Furthermore, the parties are in agreement on the 3,888 dwellings that make up the supply and thus, there was no need to look further into evidence on the individual sites, permissions and allocations.

33. The Council emphasise that the examination into the eLP is due to commence in April 2025 and will be seeking to establish a lower housing requirement than that required by the Framework under the transitional arrangements. The figure promoted in the eLP is 773 dwellings per annum. The Council's calculation of its five year supply for this appeal is therefore based on a combination of the Framework requirement for year one and the need for years 2 – 5 being set by the eLP, assuming its adoption in late 2025.

34. Whilst the Council suggests that it can demonstrate a 5.4 year supply of housing based on its hybrid approach to calculating need and making a healthy deduction based on past over supply, I am not content that the adoption of the eLP can be considered so certain or so imminent to accept this as a robust position. It is clear that the Council are progressing its eLP, but it was indicated at the hearing that it was only capable of attracting very limited weight. Therefore, whilst I do not seek to replicate the role of the examination, I am not persuaded by the evidence of the Council as part of this particular appeal that it can demonstrate a 5 year supply of housing land with appropriate 5% buffer.

35. Absent of any more robust evidence of the Council to the contrary as part of this appeal, I adopt the appellant's position which indicates that the presumption in favour of sustainable development set out in paragraph 11 d) of the Framework is engaged for decision making purposes.

Underlining is our emphasis.

Q3. What is the compelling evidence that windfalls will provide a reliable source of supply, in terms of the Strategic Housing Land Availability Assessment (SHLAA), historic windfall delivery rates, and expected future trends, as set out in NPPF paragraph 72?

2.23 Policy SP3 is written to restrict all housing in the Plan area to site allocations as set out at (i.) and 'exceptional' housing options such as affordable housing exception sites, agricultural dwellings and traveller accommodation at (vi.).

2.24 Given that the Plan is overly reliant on windfall allowances in our opinion, it is difficult to understand where they can be provided with Policy SP3 being so restrictive. The policy as drafted will be reliant therefore on brownfield sites and affordable housing exception sites to deliver the windfall allowance, and this is not credible and will not be effective.