# Winchester District Local Plan (2020-2040)

Hearing Statement Relating to Matter 5
On Behalf of Bellway Strategic Land

**April 2025** 







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# **Author**

Senior Director

Gillings Planning Ltd 2 Wessex Business Park Colden Common Winchester Hampshire SO21 1WP

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 lan 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, S032 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 - 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?

# Methodology and Application

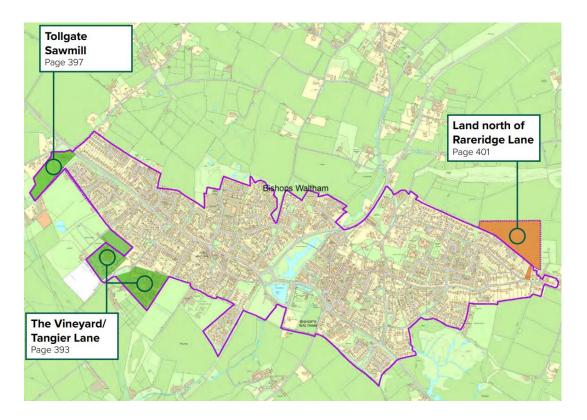
- Q1. How have the proposed allocations been identified?
- 2.1 In our view, the Council's strategy is based on the 'spreading' of development around the Plan area, and this appears to have been a broadly political decision to cause the least amount of objections from the electorate as possible. The strategy has effectively asked each Parish to 'do its bit' and accommodate some housing growth. There is a noticeable disconnect between the spreading of development around the Plan area and the relative sustainability of each of the locations.
- 2.2 Furthermore, this approach fails to recognise that the most sustainable locations, such as Bishop's Waltham can accommodate more housing and employment growth and higher rates of growth may also help bolster the overall sustainability of the place even further. For example, major housing growth in Bishop's Waltham might result in the town being large enough to have its own secondary school; which would massively improve the sustainability of the town.
  - **Q2.** 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?
- 2.3 As set out in Chapter 4 of our Regulation 19 representations, we support the concept of 20-minute neighbourhoods, but we remain concerned that this strategy has not been used fully to support the allocation of sites for development. If it had, then Bellway's site would have been allocated over many other sites that are not so well located.
  - **Q3.** 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?

- As stated from paragraph 5.49 onwards in our Regulation 19 representations, we have many concerns with the capacity assigned to Site Allocation BW4 'Rareridge Lane'. The fact that there is no master plan for the site in the public domain suggests that it has either not been prepared, or it shows something that the Council does not wish to be seen. Both scenarios demonstrate that there is no robust evidence that the site can deliver the Council's expectations.
  - Q6. 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.
- 2.5 First, we note it is not so much a question, as more of a statement of the inadequacies of the evidence prepared by the Council. It is therefore useful to review the table for Bishop's Waltham, shared below.

Bishop's Waltham Housing Sources	No. of dwellings
Net Completions in or adjoining settlement (2020-2023)	340
Outstanding permissions (at 2023) including Local Plan allocations carried forward (Policy BW1)	225
Remaining Local Plan allocations (at 2023) carried forward (Policy BW3)	10
Windfall allowance	90
New Site allocated in this Plan (Policy BW4)	100
Total Provision 2020 – 2040	765

- 2.6 As stated in our Regulation 19 stage 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.
- 2.7 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.

2.8 Even just a quick glance at the tightly drawn settlement boundary for Bishop's Waltham shows that the urban grain is tight, and the built form is predominantly residential and so we cannot easily identify any brownfield opportunities that might deliver windfall opportunities. See below.



- 2.9 As such, Policy SP3, which restricts housing development to site allocations or affordable housing exception sites will throttle growth and result in no windfalls being delivered in Bishop's Waltham. The 100 dwelling windfall allowance is not robust.
- 2.10 We remain concerned with the Plan's reliance on just one new allocation for Bishop's Waltham in the Plan and so the Council's evidence on the expected delivery of this single site is going to be key to understanding if the Plan will be effective. We have already stated in our Regulation 19 representations that the anticipated number of dwellings on the site is questionable due to the site's constraints, including BNG.
- 2.11 As set out in our Regulation 19 representations, and not repeated here, we have expressed concerns that there were many reasonable alternatives available to the Council to consider, including the allocation of omission sites such as Bellway Homes' site which is located in a more sustainable location for new homes, and has fewer constraints.