

WINCHESTER LOCAL PLAN EXAMINATION HEARING STATEMENT MATTER 5

Prepared by Pro Vision on behalf of VIVID Homes

April 2025

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PROJECT NO. 51739

PREPARED BY:



DIRECTOR

CHECKED BY:

DATE:

APRIL 2025

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1.0 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?

6. 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.

- 1.1 We agree that the evidence base is lacking analysis of the housing supply at the spatial area level. ED02 provides an update to the Housing Topic Paper (SD10g) but provides only a district level analysis. A spatial area analysis is needed to test the soundness of the supply assumptions for each area.
- 1.2 The evidence base shows that supply is being constrained; there is significantly more land available than is being allocated.
- 1.3 For example, for the Larger Rural Settlements (Wickham, Denmead, Colden Common, Swanmore and Kings Worthy) the Council has searched for an arbitrary “90 to 100 homes” on new sites, rather than looking at the capacity of suitable and available land and identifying opportunities to accommodate and provide supporting infrastructure. The starting point is one of constraining supply.
- 1.4 This applies to windfalls allowances as well. The arbitrary figures used for the Market Towns (90 dwellings), Larger Rural Settlements (50 dwellings) and Intermediate Rural Settlements (20 dwellings) are only loosely justified by evidence; it is based on averages across the settlements. A more robust assessment would be to consider trends and potential in specific settlements. The Council report that it has undertaken a “detailed analysis” of windfall development, so this information is likely to be available¹.

¹ Assessment of windfall trends and potential, Winchester City Council, 2021 (HA07).

- 1.5 The scale of the windfall allowances for each area is equivalent to another one or more site allocations (major sites), and recognising that there are more available sites in each area (evidenced by the SHELAA), a positive planning approach² would be to increase the number of plan-led sites and use the windfall as a buffer and to boost supply above and beyond the planned sites.
- 1.6 This approach would also help to boost the delivery of affordable homes and developer contributions to community infrastructure. 12% of Local Plan supply is currently windfall development, which represents a significant reliance on unplanned, small schemes, often below affordable housing thresholds, which is unjustified in a local context of the delivery of affordable homes being “a major issue” and “critical priority”³.
- 1.7 Focusing on Denmead⁴, this has an available estimated capacity assessed at 1,703 homes.
- 1.8 Even accepting the principle that sustainability assessment of available sites reduces this capacity, the drop from over 1,700 to an allocation of 100 homes on new sites is huge (i.e. bringing forward little more than 5% of the potential capacity available to meet needs).
- 1.9 By capping the requirement for the Neighbourhood Plan of 100 homes, there is little or no incentive for that plan to go beyond and “significantly boost” supply. That is evident in practice by the options for the Neighbourhood Plan that have been consulted on in recent months⁵, none of which go above the 100 homes.
- 1.10 The result is it is the Local Plan (not the Neighbourhood Plan) restraining growth potential to meet wider district needs at this sustainable location, and this is in the context of the Government’s objective to deliver 1.5 million homes over the current parliament, or 372,000 homes annually across the country requiring a significant uplift in house building. And it is also in the local context of an affordability ratio in Winchester at 12.1, significantly higher than the national average of 7.7⁶.
- 1.11 The Local Plan can do much more in terms of its objective to deliver homes for all and reduce the affordability gap, including at Denmead, one of the district’s more sustainable settlements.

² NPPF 2024 as amended (para 36)

³ Local Plan paragraph 9.36 (SD01).

⁴ VIVID is promoter of SHELAA Site DE22 Land South of Forest Road.

⁵ ‘Options 24 consultation’

⁶ 24 March 2025 (Housing Affordability in England and Wales 2024, Office for National Statistics).

1.12 Please also refer to our statement in response to Matter 8 (and the Questions on Denmead).