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Ms R Barrett
C/O Jill Taylor, Programme Officer
Winchester City Council Offices,
Colebrook Street,
Winchester,
Hampshire,
SO23 9L

04 April 2025

BY EMAIL

Dear Ms R Barrett,

MATTER 2 HEARING STATEMENT – WINCHESTER DISTRICT LOCAL PLAN EXAMINATION IN PUBLIC

We write to you on behalf of our client, Bewley Homes, in respect of the Matters, Issues and Questions (Document ref. ED13) published as part of the Examination in Public ("EiP") into the emerging Winchester District Local Plan (2020-2040), prepared by Winchester District ("the Council").

Bewley Homes has interests in Land at Forest Road and Furzeley Road, Denmead and has submitted representations to both the Regulation 18 and Regulation 19 consultations.

This letter responds to Matter 2 and we can confirm that we wish to participate in the oral examination sessions relating to this matter.

Matter 2: Spatial strategy and distribution of development Policies SP1, SP2, SP3, H1, H2, H3, and E1 and E2

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

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?

1. It is not considered that the proposed distribution of housing is supported by the evidence base, nor will it lead to an appropriate pattern of housing or economic growth.
2. The Settlement Hierarchy (August 2024) identifies Denmead as a "larger rural settlement", the third most sustainable level. The NPPF 2023 sets out that purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 83 highlights the importance of promoting sustainable development in rural areas so as to enhance and maintain the vitality of rural communities.
3. As such, it is important to ensure that spatial strategies do not disproportionately direct development to the largest settlements, neglecting comparatively more rural communities and instead allow for a spread across the hierarchy and individual settlements so as to promote sustainable development and protect against the decline of rural communities. It is also important to note that a "rural" settlement may indeed be highly sustainable and able to provide for many day-to-day needs, with larger neighbouring settlements providing a greater range of

services. In addition, the provision of housing for a wide range of needs within “rural” areas helps sustain local amenities and facilities which face challenges due to a disproportionately high percentage of older persons¹.

4. As set out within our Regulation 19 representations, the identification for the delivery of 328 dwellings (100 of which are to be identified within the Neighbourhood Plan Review) amounts to only 2.2% of the 15,115 homes which make up the Local Plan Housing Requirement for Winchester.
5. It is considered that Denmead has the ability to accommodate a much higher level of growth than currently set out within Policy H3, and one which will help preserve and enhance its vitality in line with the NPPF.
6. The Winchester District Strategic Housing Market Assessment (“SHMA”) (2020) suggests an increase of 980 dwellings to align with the expected population growth between 2016 and 2036. However, as identified above, Denham is only seeking to deliver a third of this figure. Therefore, it is not considered that the distribution of development adequately reflects the settlement hierarchy or the evidence base.
7. The IIA notes at paragraph 4.188 that development in Bishop’s Waltham, New Alresford, Kings Worthy, Denmead and Colden Common all have the potential to impact upon the setting of the National Park. Whilst this may be true of certain sites, it is not considered that a blanket approach of reducing housing delivery in these locations should be applied to all settlements. For example, development on the southern edge of Denmead may have a very minimal impact on the setting of the National Park but would help ensure the sustained growth of Denmead and its on-going vitality.
8. The summary of Denmead’s performance against the IIA objectives at Table 5.67 shows a potential significant negative impact on biodiversity and geodiversity, and water resources, and a negative impact on natural resources (due to the Mineral Safeguarding Area and the requirement for greenfield development). However, it is not considered that these issues amount to a sufficient reason to significantly reduce the number of dwellings which can be allocated at the settlement.
9. Further, there are sites identified within the SHELAA as being suitable for development within Denmead, however, these have not been allocated for new homes. This demonstrates the capacity for Denmead to accommodate a greater level of growth which is more aligned with the figures set out in the SHMA.
10. This is even more pertinent given the increase in the Local Housing Need through the revised standard method. Whilst the Plan is being examined under the previous version of the Framework and the corresponding Local Housing Need, it is important to contextualise the small number of homes being proposed to be delivered in Denham via Policy H3 against the 67% increase in the LHN through the revised standard method.
11. Therefore, in order for the Plan to be considered to be effective, positively prepared and evidenced, a greater number of dwellings should be allocated at Denham within Policy H1 and H3.

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

12. For the reasons set out above, Bewley Homes is of the view that the Council has not fully explored all realistic options for the distribution of development within the district. With the findings of the SHMA and in the light of the Council being aware in advance of the submission of the Local Plan to the Secretary of State, that the LHN figure would jump considerably, more

¹ Statistical Digest of Rural England: DEFRA March 2025 chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://assets.publishing.service.gov.uk/media/67d875029dc953ac3bfe937b/1_Population_18_03_2025.pdf

sites should have been allocated across the entirety of the district and more should have been directed towards the larger rural settlements, including Denmead.

Summary

We look forward to receiving confirmation of this letter's receipt and to attending the hearing in due course.