



Da Vinci House
44 Saffron Hill
London EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

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 5 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 5 and we can confirm that we wish to participate in the oral examination sessions relating to this matter.

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?

Methodology and Application

Q4. How would the proposed allocations provide flexibility in the event that some sites do not come forward?

1. As set out within our Regulation 19 representations, there are questions as to whether the proposed site allocations which are likely to deliver in the timescales or numbers envisaged in the Local Plan.
2. Around half of the total supply of homes is to be delivered through just four allocations of 750 dwellings or more. It is generally understood that larger sites take longer to deliver than small and medium sites due to the length of time required to prepare and submit a planning application, the time needed to determine these applications, and the amount of infrastructure required before dwellings can be constructed. Whilst North Whiteley, Land at Barton Farm and West of Waterlooville are currently under construction, Sir John Moore Barracks, which is proposed to deliver c. 900 dwellings has yet to be formally closed by the MoD.
3. The Vision Document submitted to the EiP (Document Ref. ED12), shows that the proposed timeline assumes delivery from 2027 onwards. This is considered to be highly unrealistic given no firm date has been given for when the barracks will close in 2026, having previously

been delayed. Further, commencement on site in Winter 2026/27 following the assumption of an approved outline assumed planning application by the end of 2026 is also considered to be unrealistic as it does not allow for the preparation, submission and determination of reserved matters applications, nor the discharge of conditions.

4. The Housing Topic Paper (Document Ref. ED02) suggests delivery from 2028/29. Whilst this is considered to be more realistic than the timetable put forward by the Vision Document, as with all large-scale applications, significant amounts of infrastructure will be required before homes can be delivered, and any delay in the closure of the barracks means that the delivery of homes within four monitoring years could be challenging and creates a residual risk to housing supply.
5. The most recent Authority Monitoring Report (2023/24) shows a significant uplift in the projected delivery rates for North Whitely. The AMR shows that delivery between 2024/25 to 2028/29 is proposed to increase from 1,420 dwellings to 1,550 dwellings, with a substantial improvement in the number of dwellings “unlikely” to be delivered by 2031 down from 333 to 126. Greater clarity is required to justify this uplift in delivery given the significant contribution which this site is making to the annual housing supply.
6. Conversely, the number of dwellings unlikely to be delivered by 2031 has increased at West of Waterlooville from 246 dwellings to 309 and for Land at Barton Farm, from 621 to 643. Further information should be provided to account for the slowdown in delivery and the implications on housing supply.
7. Concerns also exist regarding the feasibility of delivering the Winchester City Regeneration Scheme (W7) and Station Approach (W8), both of which are expected to provide housing within the first five years of the Plan. These are complex urban sites that were allocated in the previous Local Plan but have yet to progress. Given this delay, it is reasonable to question whether they will come forward as anticipated without additional evidence to provide reassurance and clarity.
8. Any decrease in homes delivered will have a negative impact on the Council's ability to meet its housing target. This is particularly pertinent given the level of unmet need across neighbouring authorities.
9. As set out within our Matter 1 Hearing Statements, there is a residual unmet need of 5,986 dwellings across a 20-year plan period for Havant and Portsmouth, based on the previous standard method calculation for local housing need.
10. When looking forward to the revised calculation for Local Housing Need using the most up to date affordability ratios, it is clear that housing delivery in Winchester, its immediate neighbouring authorities, as well as the wider Partnership of South Hampshire area, is seeing a big increase in housing need and the numbers proposed in the Winchester District Local Plan are already well below the new LHN figure. Therefore, any reduction in delivery against the previous target will mean a greater deficiency against the revised LHN.

Table 1: Local Housing Need calculations

LPA	LHN (pre-SM change)	LHN (March 2025)	% change
Eastleigh	645	911	41%
East Hampshire	575	1,119	95%
Fareham	498	797	60%
Gosport	339	433	28%

Havant	508	881	73%
Portsmouth	897	1,016	13%
Southampton	1,473	1,205	-18%
Test Valley	524	928	77%
Winchester	676	1,128	67%
Total	6,135	8,418	37%

11. Therefore, to provide greater flexibility and to protect against delays to the delivery of housing through allocations and to enable the Plan to be effective, further small and medium sites should be allocated for development.

Summary

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