

# **Winchester Local Plan Examination**

## **Matters, Issues and Questions**

**Statement on behalf of Bargate Homes Ltd**

**Bargate Homes Ltd**  
**April 2025**

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# 1. Introduction

- 1.1 This Statement has been prepared by Nova Planning Limited (Nova) on behalf of Bargate Homes Ltd (Bargate).
- 1.2 Bargate is promoting Land South of Forest Road for residential development (hereafter referred to as 'the Site'). The Site has been assessed through the Winchester City Council Strategic Housing and Employment Land Availability Assessment (2023) (SHELAA) and Denmead Neighbourhood Plan (DNP) site assessment process under reference DE05. A density of 30 dph was applied, generating a yield of 77 dwellings. The SHELAA assessed the Site as deliverable/developable within 0-5 years.
- 1.3 This Statement addresses the Inspector's questions in the context of the emerging Winchester Local Plan 2020-2040 (eLP) as a whole. However, there is a focus on the Parish of Denmead and the implications for the Site.

## 2. Matter 8: Development Allocations the Market Towns and Rural Areas (MTRAs)

**Issue: Whether the proposed housing site allocations in MTRAs would be justified, effective and consistent with national policy?**

- 2.1 Whilst we recognise that the emerging eLP will be examined against the December 2023 version of the framework, the changes made in December 2024 provide relevant and up-to-date context to our comments on housing delivery and affordability.
- 2.2 Paragraph 60 of the December 2023 framework makes clear that the planning system should be seeking to significantly boost housing delivery. Paragraph 61 of the December 2024 framework reflects this intention and the Government's objective to deliver 1.5 million new homes during the current parliament. This equates to a new target of 372,000 homes per year which represents a 21% increase on the previous target of 305,000 per year.
- 2.3 This objective recognises that home ownership is out of reach for the average worker, that housing costs consume more than a third of private renters' income and that the number of children in temporary accommodation now stands at a historic high of nearly 160,000. Figures published in March 2025 show that the affordability ratio in Winchester is 12.1, one of the highest in the south-east and significantly higher than the England average of 7.7.
- 2.4 Paragraph 11 of the NPPF makes clear that all plans should promote a sustainable pattern of development.
- 2.5 Paragraphs 15 and 16 of the NPPF support a plan-led system.
- 2.6 Paragraph 72 of the NPPF confirms that there should be compelling evidence that windfall will provide a reliable source of supply.
- 2.7 It is within the context of this national policy that Bargate consider that the proposed housing allocations for the MTRAs, in particular Denmead, will fail to deliver an appropriate level of housing in the most sustainable locations. While the new standard method housing need figures do not apply to Winchester under the current plan, the Council's Local Development Scheme (LDS) shows that they will apply from 2028. For the reasons set out below, it is considered that direct allocations through eLP and less reliance on windfall sites would provide a more justified and effective strategy consistent with national policy.

**1. Denmead Parish Council is updating its Neighbourhood Plan at present. When is the Neighbourhood Plan expected to be ‘made’? What is the evidence that it will come forward in an appropriate and timely manner?**

2.8 Notwithstanding the issues in relation to the timing of the DNP as set out below, Bargate do not believe the approach taken by the parish to date will result in a plan capable of meeting the basic conditions. This is because the proposals are not supported by the evidence commissioned by the parish themselves (Aecom Sustainability Appraisal Report).

2.9 In December 2024, Denmead Parish Council (DPC) published the results of a site selection public consultation, which took place from 11 October to 6 December 2024. Exhibitions took place and a Site Options booklet was distributed to local residents. The booklet explained that,

*“Winchester City Council have brought forward the delivery of the Local Plan..... and therefore, the Neighbourhood Plan also has had to be brought forward too”.*

2.10 The evidence to date demonstrates that the DNP has not progressed as expected. A Draft Project Plan was published in 2022 which programmed submission of the DNP in October 2023. This has not happened. Although DPC has recently consulted on site options, it has yet to consult on a Draft Plan. Assuming the timescales in the original project plan, it will take at least a further 18 months until the plan is submitted for examination. Allowing for the examination and referendum, it is unlikely to be ‘made’ until at least Spring 2027.

2.11 Notwithstanding this, Policy DEN1 of the eLP states that development in Denmead will be phased for the latter part of the Plan period and permission for housing will not be granted before 2030. Under paragraph 34 of the NPPF, Local Plan policies need updating within five years of adoption. Reviews should be completed no later than five years from the adoption date of the plan, which is currently scheduled for Autumn 2025. The WCC LDS shows that work will commence on the next Local Plan review in 2026, with adoption in Winter 2028. Due to the phasing restriction in Policy DEN1, development cannot be delivered until after the adoption of the subsequent Local Plan in 2028. This issue will significantly undermine the neighbourhood planning process, and it is difficult to see any incentive to commit significant time and resources to a neighbourhood plan-making process that will be overtaken by the subsequent Local Plan.

2.12 It is important to note in this context that the subsequent Local Plan will include a review of housing policies in accordance with the new Standard Method. For Winchester district, this will increase the Standard Method figure from 676 dwellings per annum in accordance with the eLP to 1,157 dwellings per annum. The subsequent Local Plan will inevitably require a significant increase in housing provision across the district. It is equally inevitable that Denmead will be

identified for a significantly higher housing allocation in the subsequent Local Plan. As Denmead is comparatively more sustainable than other MTRA settlements, it is reasonable to assume that Denmead will take a higher proportion of the increased growth than the eLP position. Based on the respective timelines for the emerging DNP and subsequent Local Plan, the Steering Group and local residents will be made aware of the increased housing requirement for Denmead on or before publication of the Regulation 14 Draft Neighbourhood Plan. It is difficult to see what incentive there would be to proceed on this basis, in the knowledge that the DNP will be effectively out of date at the point it is 'made'.

**2. What is the evidence to justify an approach to designate an additional site/sites in the Neighbourhood Plan? What is the evidence to justify the housing target of 100 additional dwellings and would this ensure that development is directed to the most sustainable settlements?**

- 2.13 Denmead is a sustainable location for development. There is a primary school, church, shops, public houses and restaurants, health centre, sports grounds and play facilities. It is also located approximately 3km from Waterlooville where there is a wider range of services including major retail outlets and employment opportunities. Bus services (D1 and D2) run every hour between Denmead and the large settlement of Waterlooville.
- 2.14 Winchester City Council published a SHELAA in 2023 (updated 2025). The theoretical residential capacity for Denmead rose to 3,984 dwellings, up from 3,669 in 2021. The WCC Development Strategy and Site Selection Topic Paper (DSSSTP) (2024) was subsequently published and identifies Denmead as a larger settlement with an estimated capacity of 1,703 dwellings. Despite this, the DNP is required to allocate only 100 dwellings. This is considered disproportionately low given the sustainability benefits and availability of sites in Denmead.
- 2.15 A direct allocation through the eLP would provide a more effective approach to housing delivery. It would provide more certainty in directing development to the most sustainable location. Whilst still subject to formal consultation and subsequent examination, the DNP site selection consultation (December 2024) has concluded that Option 2 (Land north of Anmore Road next to Carpenters Field) should go forward into the DNP. This site has been promoted for 238 dwellings so the plan will rely on only part of the site coming forward. This undermines the delivery of associated infrastructure and will result in piecemeal development, with the potential for the remaining part of the site to be delivered through a series of speculative applications. Given the timing disconnect, the site is very unlikely to come forward for even 100 dwellings as development cannot take place until 2030, by which time a new plan is expected to be in place.

**3. What is the evidence that there are suitable sites available for designation? Would this approach provide the necessary certainty for the development plan process? In taking this approach would the Plan accord with a Plan led approach?**

- 2.16 The SHELAA (2023/2025) shows that the theoretical residential capacity for Denmead rose to 3,984 dwellings, up from 3,669 in 2021. This includes all sites; the SHELAA confirms this will be adjusted to remove sites which are unsuitable for development. Paragraph 6.22 of the DSSSTP 2024 identifies 15 sites from the SHELAA with a capacity 1,703 dwellings.
- 2.17 In addition, DPC commissioned a Site Options and Assessment Report (July 2024) by Aecom. This confirms site availability in the parish and concludes that 23 sites with an indicative capacity of 1,158 dwellings are appropriate/potentially suitable for allocation in the Neighbourhood Plan. Although this differs from the Council's conclusions, it does confirm that there is significant unused capacity within Denmead.
- 2.18 In line with the Localism Act 2011, paragraph 2.10 of the eLP recognises the role of neighbourhood planning in allowing communities to shape their local area. Bargate do not dispute that Neighbourhood Plans can provide a valuable source of housing delivery. However, there are clear risks associated with a housing strategy that is so reliant on neighbourhood planning - the underdelivery issues outlined in Bargate's response to Matter 5 highlight these risks, and this is further exacerbated by the phasing restriction until 2030. In this case, the only other source of delivery is from windfall development, which adds further risk of underdelivery. These risks are unjustified and unnecessary, and they undermine the effectiveness of the eLP. Direct allocations through the eLP would be more effective.

#### **4. What is the justification to phase development delivery until after 2030 and would this be justified by the evidence?**

- 2.19 Paragraph 9.23 of the eLP provides the Council's rationale for a restriction on housing delivery until 2030. It notes that there is no scope to phase development where it will be delivered through existing permissions or windfall. Consequently, greenfield allocations will be phased towards the latter part of the plan period to prevent all housing being built out during the early years of the plan. This is an artificial and self-imposed restriction, not a reasoned justification. It is completely at odds with the Government's objectives to significantly boost housing delivery (NPPF 2023) and the more recent and stronger emphasis to address the housing crisis as set out at paragraphs 2.1 to 2.3 above. It acknowledges that there is no reason why this development could not come forward sooner in the plan period to tackle the significant affordability issues highlighted at paragraph 2.3. It also highlights that WCC could go much further in dealing with the wider housing need issues in more constrained areas adjoining the district, given the extent of available and developable land as highlighted at paragraph 2.16.
- 2.20 The assertion at paragraph 9.24 of the eLP that phasing will allow brownfield or previously developed land (PDL) sites to come forward early in the plan period is flawed. Delivering development on PDL is often complex and time consuming, due to issues such as site clearance, decontamination and relocation of existing uses. WCC claim that many PDL sites are being carried forward from previous Local Plan allocations. This trend in itself demonstrates that there are

delivery issues on PDL and it fundamentally undermines the Council's strategy. This is particularly concerning as WCC is relying on a significant proportion of housing delivery from PDL sites. In Winchester city, this includes new allocations and amended allocations carried forward from the previous Local Plan. As windfall development is largely limited to development within settlements, it is also reasonable to assume that a significant proportion of the plan-wide windfall allowance will rely on PDL sites.

- 2.21 The issues cited above that complicate housing delivery on PDL sites also create viability challenges. In many cases these challenges mean that affordable housing provision is reduced or omitted from PDL development. Any such reduction in affordable housing delivery will add further pressure on the affordability issues highlighted at paragraph 2.3.
- 2.22 The phasing restriction also has direct implications on the viability of those areas where the restrictions apply, including Denmead. The availability of sites to meet the planned allocations in these areas is evidenced in the SHELAA in accordance with Paragraph 72 of the NPPF.
- 2.23 The availability of sites is therefore based on viability assumptions (e.g. build and infrastructure costs) at that time. In many cases, these assumptions will be out of date by 2030, which is the earliest point of delivery according to the phasing restriction. The phasing requirement is therefore unjustified and inconsistent with national policy.
- 2.24 As evidenced by Bargate's previous submissions to Winchester District Council and the Council's own SHELAA, Land South of Forest Road is available, deliverable and developable now. The Site is in a sustainable location outside of the Denmead-Waterlooville Gap and is not constrained in terms of environmental or technical considerations. There is no justification to delay delivery of this Site when it can make a significant contribution to housing delivery, including affordable housing.
- 2.25 Overall, this approach directly conflicts with the objective of significantly boosting housing supply. It does not allow for a sufficient amount and variety of land to come forward, as required by paragraph 61 of the NPPF.

**5. If the Neighbourhood Plan was not made in a timely manner, how would the housing shortfall be made up? Extant Neighbourhood Plan allocations have yet to deliver what is the evidence that they will deliver in the Plan period (28 dwellings)?**

- 2.26 For the reasons set out at paragraph 2.10 above, there are clear reasons why the DNP will not be 'made' in a timely manner and potentially mothballed to align with the subsequent Local Plan. There is little incentive to commit time and resources to a Neighbourhood Plan which is undermined by the phasing policy at DEN1 and will prevent development from coming forward over the next 5 years i.e. the expected lifetime of the eLP.



2.27 If the DNP is not 'made' in a timely manner, then the Council risks being unable to maintain a housing land supply in accordance with paragraph 78 of the NPPF. This risk is increased by the Council's strategy to include an overreliance on windfall development as another major source of delivery. In that scenario, paragraph 11d of the NPPF would be engaged and the Council would not be in a position to control delivery. Strategic Policy H2 suggests that the phasing restriction could be relaxed in this scenario, but this would not disengage Paragraph 11d and development would inevitably come forward via speculative planning applications in an ad-hoc manner. Any strategy that carries this risk cannot be truly plan-led in accordance with paragraphs 15 and 16 of the framework. It undermines the delivery of sustainable development, including the coordinated provision of infrastructure to support growth.

2.28 As set out in Bargate's response to Matter 5, the 'made' Neighbourhood Plan is not expected to deliver at least 12 no. dwellings from the remaining allocations. To date, only four of the 28 no. dwellings have planning permission. Provision of development through the current DNP has been problematic and does not provide compelling evidence that the remaining dwellings will be delivered.

2.29 Without prejudice to our primary view that direct allocations through the eLP provide the most certainty, it is considered that a Local Plan policy similar to Policy SS5 of the adopted Basingstoke Local Plan, could be provided to address this scenario:

*..... if a neighbourhood plan/neighbourhood development order (Regulation 16) has not been submitted by XXXX, the council will consider the need to allocate additional sites.*

2.30 Development through the eLP is reliant on a significant number of sites coming forward through neighbourhood planning and windfall sites. A policy which allows the Council to directly allocate additional sites in the event that these mechanisms do not provide the expected level of growth, would provide an alternative mechanism in order to safeguard the spatial strategy.

**6. Should policy DEN1 address off site infrastructure needs? Would it be necessary for the purposes of soundness to address the requirement to liaise with water and waste water providers?**

2.31 There are existing mechanisms for identifying the infrastructure needs of an area. The Infrastructure Delivery Plan (IDP) forms part of the eLP evidence base to inform and support the level of growth which has been allocated in the Plan. The Community Infrastructure Levy (CIL) provides the funding mechanism for many infrastructure improvements and contributions/provision through Section 106 will address requirements in relation to a specific development.

2.32 Paragraphs 16 and 25 of the NPPF recognise the importance of engaging with infrastructure and service providers as an integral part of the plan making process.

2.33 The eLP does not contain a general infrastructure policy; instead site allocation policies in the plan refer to infrastructure requirements specific to each development. In the absence of an infrastructure policy and/or reference to the IDP, it would follow that Policy DEN1 should provide details of infrastructure requirements. However, as the location of development is not known, this may not be possible and again, points to direct allocations through the eLP as a more effective way to deliver housing and achieve sustainable development.

### 3. Conclusion

- 3.1 This Statement has been prepared by Nova Planning Ltd on behalf of Bargate Homes Ltd, to address specific Matters Issues and Questions in relation to Matters 8 of the Winchester Local Plan 2020-2040 Examination.
- 3.2 In summary, Bargate consider that there are considerable risks associated the Council's housing strategy, both in terms of 1) the reliance this strategy places on housing delivery from Neighbourhood Plans despite past underdelivery and a phasing restriction that in itself undermines the merits of neighbourhood planning; and 2) a significant overreliance on windfall development.
- 3.3 Whilst this is a wider strategic issue that undermine the soundness of the housing strategy and by association the Plan itself, it is also directly relevant to the Parish of Denmead. The proposed strategy will create uncertainty, undermine the delivery of new homes and associated infrastructure and mean that development is not directed to the most sustainable locations. In the context of Denmead, these issues can only be overcome by significantly reducing the reliance on windfall development and making direct allocations through the eLP. This should also account for past underdelivery of affordable housing from current Neighbourhood Plan allocations.
- 3.4 Bargate does not support the Council's constrained approach to housing generally, and there is clear evidence that WCC could be doing much more to ensure that housing provision is increased and delivered quickly to address the significant need in Winchester and adjoining areas. Doing so would also help with longstanding affordability issues.
- 3.5 With these considerations in mind, there should be an increased housing requirement for Denmead, and this should be planned for with direct allocations. This increase in provision would better reflect the sustainable location and characteristics of Denmead and help ensure it is maintained as a viable community. Denmead is a suitable and sustainable location (Larger Rural Settlement) to accommodate an increased housing requirement above that currently identified in the eLP.
- 3.6 As evidenced by Bargate's previous submissions to Winchester District Council and the Council's own SHELAA, Land South of Forest Road is available, deliverable and developable now. The site is in a sustainable location outside of the Denmead-Waterlooville Gap and is not constrained in terms of environmental or technical considerations. There is no justification to delay delivery of this Site when it can make a significant and positive contribution to housing delivery, including affordable housing.