

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 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 Local Plan as a whole. However, there is a focus on the Parish of Denmead and the implications for the Site.

2. 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

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.

Denmead Housing Sources	No. of dwellings
Net Completions in or adjoining settlement (2020 – 2023)*	117
Outstanding permissions (at 2023) including Neighbourhood Plan allocation (DNP Policy 2i)	33
Remaining Neighbourhood Plan allocations (at 2023) (DNP Policies 2ii and 2iv)	28
Windfall allowance	50
New Sites to be allocated in DNP Review (Policy D1)	100
Total Provision 2020 – 2040	328

* The ‘net completions’ include 14 dwelling and 33 communal dwelling equivalent completions at Parklands Business Park. The ‘outstanding permissions’ include 26 dwellings at Parklands Business Park.

Denmead Housing Sources: Winchester District Local Plan 2020-2040

- 2.1 It is considered that the figure for the remaining Neighbourhood Plan allocations is overestimated. Policy 2ii) of the ‘made’ Denmead Neighbourhood Plan allocates land off Tanners Lane for about 20 no. dwellings. A planning application (reference 24/00337/FUL) was submitted for residential development (11 no. dwellings) on part of this allocation in February 2024. The Planning Statement confirms that the 0.64 hectare allocation site includes the residential property of ‘The Elms’ and its associated annexe called ‘Little Elms’ but goes on to state that the owners of the property and annexe wish to continue to live in the property and so the properties and a retained garden area to the rear have been excluded from the application site. The application site area was therefore reduced to 0.41 hectares.
- 2.2 Planning application 24/00337/FUL was refused on 12 December 2024. The reasons for refusal relate to the cramped layout, access and loss of tranquility. A copy of the layout can be found at **Appendix 1** of this Statement. As a proposal for 11no. dwellings was found to result in a cramped layout, any subsequent planning application seeking to address this reason for refusal will need

to include a material reduction in the number of proposed dwellings, meaning that the allocated site will deliver significantly less than the 20no. dwellings stated in the policy. Should a revised proposal fall below 10no. dwellings, which is likely, then this would constitute minor development on a site area of less than 0.5 hectares and therefore the allocated site would not deliver any affordable housing when the allocation should have provided 8no. affordable dwellings.

- 2.3 Policy 2iv) of the 'made' Denmead Neighbourhood Plan allocates land off Anmore Road for about 10 no. dwellings. A planning application (reference 23/02922/FUL) was submitted in December 2023 for 8 no. dwellings on the eastern part (0.27 hectares) of the allocation. It was subsequently withdrawn. Planning permission (24/01697/FUL) was subsequently granted for 4 no. dwellings on the same application site, comprising the eastern part of the allocation. A copy of the layout can be found at **Appendix 2** of this Statement. As above, should a revised proposal fall below 10no. dwellings, which is likely, then this would constitute minor development on a site area of less than 0.5 hectares and therefore the allocated site would not deliver any affordable housing when the allocation should have provided 4no. affordable dwellings.
- 2.4 There is no planning history in relation to the western part of the allocation (adjacent/rear of 61 Anmore Road). The plot at 61 is smaller than that of 65, which means that assuming the same density, it is unlikely that more than 3 no. dwellings could be achieved. It is also difficult to see how access could be achieved, questioning deliverability. Therefore, proposals to date indicate a shortfall of between 3 – 6 no. dwellings for this allocation.
- 2.5 In total, only 4 no. dwellings have been permitted from the remaining 28 no. dwellings in Neighbourhood Plan allocations. From this evidence it appears very unlikely that 28 no. dwellings will be delivered on these allocations. With the above considerations in mind, we consider that this figure should be amended to around 16 no. dwellings.

Site	Made Denmead Neighbourhood Plan allocation	Winchester Local Plan 2020-2040 Denmead housing sources: remaining NP allocations	Predicted delivery from remaining Neighbourhood Plan allocations	Shortfall based on Winchester Local Plan 2020-2040
Tanners Lane	20	28	9 (estimate)	
Anmore Road (land associated with no.65)	10		4 (permitted)	
Anmore Road (land associated with no.61)			3 (estimate)	
Total	30	28	16	12

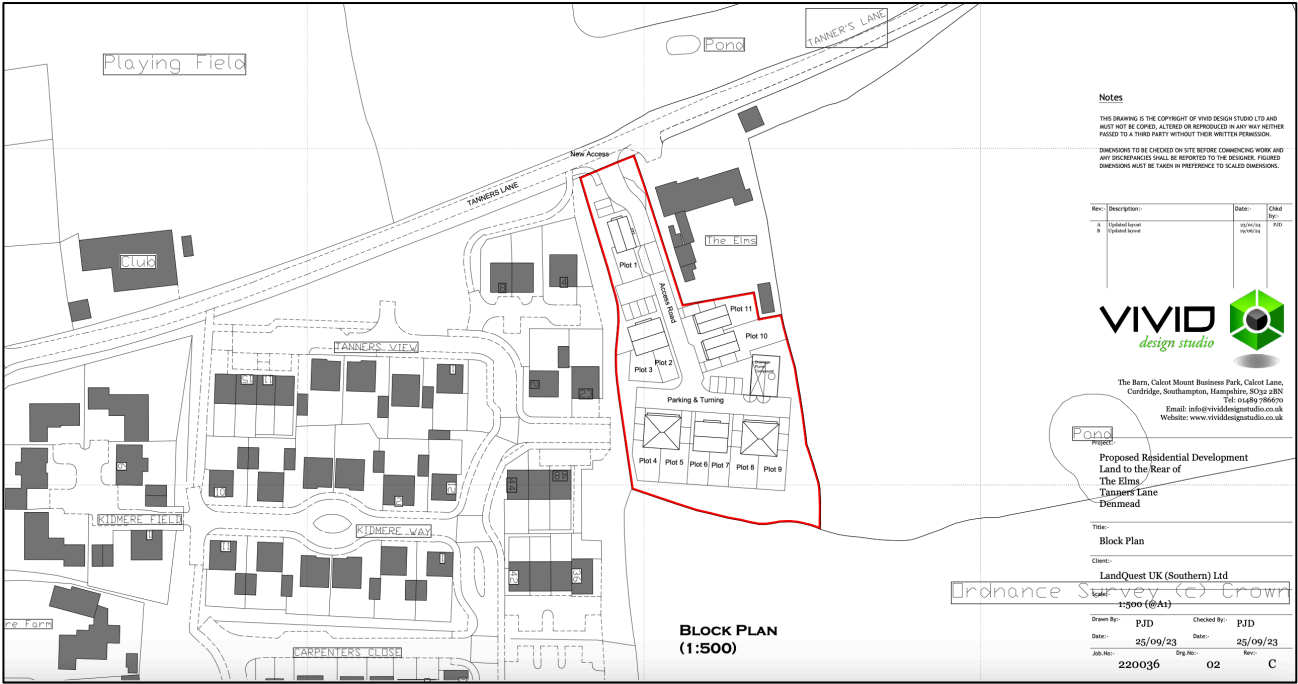
Table 1: Housing supply from remaining Denmead Neighbourhood Plan Allocations

- 2.6 The ‘Denmead Housing Sources’ table provides a windfall allowance of 50 no. dwellings for Denmead. This means that a third of all new homes (i.e. over and above existing commitments) is expected to be provided on windfall sites. For clarification, the 150 no. new homes comprise 50 from windfall and 100 from new allocations. As set out in our Regulation 18 and Regulation 19 representations (paragraphs 3.2 and 3.14 respectively), direct allocations provide the highest level of certainty in terms of delivery and in terms of directing development to the most sustainable locations. In addition, past trends do not provide certainty on future availability, particularly when past trends are based on opportunities that have arisen largely within settlement policy boundaries and there are no proposals to expand settlement policy boundaries through the emerging Local Plan. Even if windfall sites do come forward in the plan period, it will be on an ad-hoc basis undermining infrastructure delivery. For these reasons, it is considered that the overreliance on windfall allowance fails the tests of soundness set out in paragraph 35 of the NPPF. Furthermore, this approach is not plan-led and risks a failure to meet the minimum housing requirements if windfall sites do not come forward as expected. Denmead is a highly sustainable location (see Bargate’s Statement in relation to Matter 8). Housing provision in Denmead should be plan-led to ensure certainty in terms of delivery and supporting infrastructure. A strategy which relies on windfall sites to make up a third of future commitments is not considered to be positively prepared, justified or effective.
- 2.7 In summary, the housing delivery assumptions for Denmead underpinning the emerging Local Plan are flawed. There is clear evidence of under delivery from Neighbourhood Plan allocations and an overreliance on windfall development. These issues raise genuine concerns over assumed delivery (including the assumption that the residual 12 no. dwellings from the existing Neighbourhood Plan will come forward).
- 2.8 There is no basis to rely on delivery of the residual 12 no. dwellings from the made Neighbourhood Plan for the reasons cited above. This shortfall should be accounted for in the housing requirement for the emerging Local Plan. Furthermore, to recover the loss of affordable housing provision in the current Neighbourhood Plan, i.e. a shortfall of 12 no. affordable dwellings, an additional 30 no. dwellings should be allocated on the basis of the 40% affordable housing requirement in the emerging Local Plan. This is critical to address significant affordability issues in Winchester (see Bargate’s Statement in relation to Matter 8).
- 2.9 Similarly, there is significant risk associated with a strategy that is so heavily reliant on windfall development and assumptions about delivery from unplanned development over the plan period. The strategy should be revised to remove this risk and housing should be secured through direct allocations in the Local Plan. This would provide a more certain and “plan-led” approach to housing delivery, aligning with the Government’s intention to further boost housing delivery. The delivery issues experienced through the current Neighbourhood Plan endorse this view.

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 Matter 5 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 emerging Local Plan. 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 emerging Local Plan.
- 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.

Appendix 1: Site Layout – Tanners Lane



Refused planning application 24/00337/FUL

Appendix 2: Site Layout – Anmore Lane



Permitted planning application 24/00337/FUL