

WINCHESTER LOCAL PLAN EXAMINATION HEARING STATEMENT MATTER 5

Prepared by Pro Vision on behalf of Bargate Homes

April 2025

WINCHESTER LOCAL PLAN EXAMINATION HEARING STATEMENT MATTER 5
PROJECT NO. 51740

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CONTENTS

1.0	Matter 5 Site Allocation Methodology	1
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1.0 Matter 5 Site Allocation Methodology

Q6. 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 infrastructure¹. Their starting point is one of constraint.
- 1.4 Focusing on Colden Common, this has an available estimated capacity of 551 homes².
- 1.5 Even accepting the principle that sustainability assessment of available sites reduces this capacity, the drop from over 550 to an allocation of just 90 homes on new sites is huge (i.e. bringing forward less than one fifth of the potential capacity identified in the evidence base as available to meet needs).
- 1.6 This strategy allocation is considered to be disproportionality low given the local housing need and sustainability of this Larger Rural Settlement, in close proximity to the principal settlement of Winchester.
- 1.7 In this context of available land, the reliance on windfall development is brought into sharp relief. The arbitrary figures used for the Market Towns (90 dwellings), Larger Rural Settlements

¹ Development Strategy and Site Selection 2024 Proposed Submission Plan July 2024 (SD10b). Paragraph 6.21).

² Ibid (paragraph 6.33)

(50 dwellings) and Intermediate Rural Settlements (20 dwellings) are only loosely justified by evidence; it is based on averages across the settlements.

- 1.8 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 available³.
- 1.9 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 approach⁴ would be to increase the number of plan-led sites and use the windfall as a buffer and a means to boost supply above and beyond the planned sites.
- 1.10 This approach would also help to boost the delivery of affordable homes and developer contributions to community infrastructure. 12% of supply is currently windfall development, which represents a significant reliance on unplanned, small schemes below affordable housing thresholds, which is unjustified in a local context of an acute affordability problem.
- 1.11 Focusing on Colden Common, which is a specific interest for Bargate Homes, 50 dwellings represents 16% of supply from windfall through this Local Plan (supply is 304 dwellings)⁵. But discounting commitments (116 dwellings) that takes the proportion of windfall up to 27%⁶, and further discounting rolled forward allocations (48 dwellings) that rises still further to 36%⁷.
- 1.12 Noting that the local plan is not expanding the settlement boundaries (other than for the allocated sites), the prospect for windfall development is not expanding over the plan period. To expect similar trends of windfall from the same settlement areas is unrealistic. A reliance of up to 36% of supply from windfall in Colden Common in this context is not considered to be positive planning, or justified by national policy⁸.
- 1.13 Bargate Homes is promoting the development of Lower Moors Road (SHELAA Site CC05) for 45-55 homes. As we have demonstrated previously⁹, CC05 performs more strongly against the sustainability assessment than the allocated site being rolled forward (CC19 Clayfield Park).

³ Assessment of windfall trends and potential, Winchester City Council, 2021 (HA07).

⁴ NPPF 2024 as amended (para 36)

⁵ $(50/304)*100=16$.

⁶ $304-116=188$; $(50/188)*100=27$

⁷ $(304-116)-48=140$; $(50/140)*100=36$

⁸ NPPF 2024 (para 75) requires “compelling evidence”.

⁹ Regulation 19 Representations (Policy CC1)

This provides compelling evidence for allocation of CC05 as well, boosting the supply of affordable homes and other community benefits.

- 1.14 In terms of capacity of new sites, we are confident in the Council's methodology which takes estimated capacity from the SHELAA, applying a typical density per hectare of development for the spatial context (urban, sub-urban, rural etc) and applying that to the site area. The policy requirement for "overall site plans" will help to confirm individual site capacities in due course. In some cases, once local context is fully understood, the capacity of some sites may be reduced. This further points to adopting more site allocations to give greater certainty over supply and using windfalls to boost supply, or compensate for any under delivery, rather than relying on them.
- 1.15 We have raised doubt over the strategy of rolling forward the allocation at Clayfield Park (Policy CC1). Please see our Hearing Statement on Matter 8 (Colden Common).