

Winchester Local Plan 2020-2040

Hearing Statement on behalf of:

Peter Nicholas Homes
(Representor No. ANON-AQTS-329G-X)

Relating to Matter 8:

Development Allocations in 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?

Larger Rural Settlements

Denmead

Policy DEN1 Denmead Neighbourhood Plan Designated Area

Q 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?

Response

- 1.1 Peter Nicholas Homes (PNH) share the Inspector's concern that the Denmead Neighbourhood Plan may not come forward in an appropriate and timely manner.
- 1.2 The Denmead Neighbourhood Plan (NP02) was 'made' in 2015 and is now 10 years old. In recognition of its age, the Parish Council formed a new Working Party to carry out a review of the Plan. A draft project plan for preparing the

Neighbourhood Plan was published on the Parish website in 2022. As can be seen from the Project Plan (in Appendix 1 to this Statement) the timetable only covers up to Submission of the Plan. The Steering Group were anticipating consulting on the Plan with the local community in January 2024 with a pre-submission consultation in April 2024 and submission in October 2024. This timetable for submission has not been met. The Neighbourhood Plan Steering Group is still to consult on a draft plan and at a meeting of the Steering Group in December 2024 it was acknowledged that the next steps would be to look updating sections of the current plan. This work appears to be still on-going and no updated plan preparation timetable has been produced. There remains no timetable setting out when the Neighbourhood Plan is expected to be 'Made'.

- 1.3 The submission timetabling delays appear to have been exacerbated by procedural irregularities. In 2022 the Parish published a Neighbourhood Plan Steering Group Terms of Reference. As part of the Terms of Reference Members were required to declare an interest where decisions or recommendations could result in potential advantage or disadvantage, whether financial or otherwise, to them, their family or close associates. The Neighbourhood Plan website was recently updated to advise that members of the public had expressed concerns that individuals involved with the neighbourhood plan development could potentially benefit financially from a decision to designate land for development. These concerns were shared by both the Parish Council and Winchester City and the Members with financial interests have subsequently been removed from the Steering Group. The website indicates that new members are now being recruited.
- 1.4 In late 2024 the Steering Group ran a consultation with the local community on a very limited range of potential site options. The consultation was of particular concern for PNH on several grounds:
- Despite the PPG expecting Neighbourhood Plan groups to be open and inclusive in the preparation of their neighbourhood plans, businesses and landowners with legitimate with interests in the area were excluded from participating in the process.

- When undertaking the assessment of land availability and assessing the suitability of sites for allocation, the Steering group applied a 'policy-on' approach, effectively excluding a significant number of potential development sites.
- The exclusion of a valuable and sustainable source of housing units supply given the uncertainty around Winchester's housing requirements and potential need for additional sites.

PNH wrote to the Parish and to Winchester Council to express concerns about the approach that the Steering Group were taking to the preparation of the plan. A copy of the letter is contained in Appendix 2. A response to the Neighbourhood Plan site options consultation was also submitted by PNH but was discounted by the Steering Group. [\[Denmead Neighbourhood Plan Consultation Report 2024\]](#)

- 1.5 In light of the above, it is submitted that the Neighbourhood Plan Review is already significantly delayed and has been subject to significant procedural irregularities. As such, PNH do not believe it will come forward in a timely or appropriate manner.

Q2. 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?

Response

Approach

- 1.6 PNH strongly consider that a strategic allocation for Denmead needs to be made in the emerging Winchester Local Plan, rather than designating additional site/s in the Neighbourhood Plan.

- 1.7 The strategic allocation route would facilitate the accommodation of higher growth in a sustainable settlement and avoid reliance on the uncertain Neighbourhood Plan process. A strategic allocation/s would also provide the development industry with greater certainty and would help Winchester in delivering its increased housing growth requirements at pace in a sustainable location. The Council is significantly under-delivering against the new Standard Method derived local housing requirements and non-strategic smaller sites could still come through the slower Neighbourhood Plan process to help with meeting the District's longer term wider growth requirements.
- 1.8 The existing neighbourhood plan has failed to facilitate delivery of the smaller extant allocations and as noted in the response to Q2 above, there is significant concern that the Neighbourhood Plan process in Denmead will not deliver even the additional 100 homes in a timely and appropriate manner.

Justification for 100 home limit & sustainable pattern of development

- 1.9 PNH do not believe that there is reasonable evidence to justify limiting the housing target for Denmead to just 100 additional dwellings. Equally, they consider the Council's decision to limit Denmead's growth in this way will not help foster a sustainable pattern of development.
- 1.10 Denmead is a higher tier settlement that ranks 5th of the 49 settlements in Winchester District in terms of the facilities and services it provides (Settlement Hierarchy Background Paper (DS01)). The Council acknowledges in the Paper that such settlements are often more sustainable locations for new development. Additionally, Denmead is close to Waterlooville with its extensive range of facilities and services. On this basis only, the settlement would be expected to shouldering a far greater proportion of Winchester's housing needs and it still remains unclear why the decision to limit Denmead's growth has been taken.
- 1.11 To add to the settlement's sustainable location, there is also an existing supply of sites located on the edge of the settlement which could be brought forward in a sensitive and sustainable way to help accommodate Denmead's and Winchester's future growth needs. These sites were deliberately and unjustifiably excluded by the Neighbourhood Steering Group when considering allocation options. Just one

of these sites (Furzeley Village) has the ability on its own to deliver at least 350 new homes. Details relating to this exclusion are dealt with in the October 2024 letter to the Neighbourhood Plan Steering Group set out in Appendix 2.

- 1.12 100 new homes in Denmead represents just 3% of the total allocations that the Winchester Plan is proposing to bring forward in the plan period. For such a sustainable settlement this lack of ambition is unjustified and fails to direct development to the most sustainable locations.

Q3. 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?

Response

- 1.13 PNH consider that there are suitable sites in Denmead for strategic allocation that would provide certainty in relation to delivery. The Furzeley Village site is a 34ha site with potential capacity to accommodate a mixed use scheme involving at least 351 homes, extensive green infrastructure and other uses potentially including employment and community facilities. The site is identified in the SHELAA (HA04) as DEN22 & 23 with a large part of it being identified as deliverable/developable. Early visioning work has already been undertaken for the site.
- 1.14 PHN believe that there could potentially be difficulties in identifying sites in Denmead via the neighbourhood plan process. The Parish website states that members of the public have drawn the Steering Group's attention to the fact that 2 of the potential Neighbourhood Plan site allocation options have significant planning constraints on them that had not been previously recognised.

Q5. 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)?

Response

- 1.15 In Para 2.6 of the Updated Housing Topic Paper 2025 (ED02) the Council acknowledges that the Council's housing requirement over the Plan period is less than 80% of the new Standard Method figure.
- 1.16 In such circumstances Paragraph 234b of the NPPF expects the Council to begin work on a new plan in order to address the shortfall in housing need¹. The Council's most up-to-date Local Development Scheme (February 2025) indicates that work will commence on a review of the local plan in Q2 of 2025 with examination and adoption is expected to occur in 2028 (ED16). The Council's commitment to an early review is also expressed in the proposed Modifications for this current emerging plan.
- 1.17 Accordingly, it is possible to argue that any non-delivery by the Neighbourhood Plan could be dealt with via the early Local Plan review. Using a strategic allocation mechanism in the next review of the Plan could address existing baked-in shortfalls and help to meet the district's much higher housing numbers.
- 1.18 However, such a mechanism will take a considerable time to deliver growth on the ground (well past 2028) and it is suggested that Policy H3, Policy DEN1 and Policy NE7 of the current emerging Plan be amended to enable a strategic scale growth to come forward in areas outside of Denmead's settlement boundaries. This would enable sustainably located sites such as Furzeley Village to come forward quickly and help Denmead, and the wider Winchester district, deliver growth at pace.

¹ Preparation of the new plan to be under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025).

Appendix 1: Denmead Neighbourhood Plan: Draft Project Plan

Denmead Neighbourhood Plan: Draft Project Plan

PROJECT PLAN SUMMARY																							
STAGE	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan 22	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan 23	Feb	Mar	
1. Getting Started	C1	C1	C1	C1	C1	C1	C1	C1															
2. Identify Issues										C2	C2												
3. Aims, Vision & Objectives																			C3 / C4	C3 / C4	C3 / C4		
National milestones				Planning Bill, Climate Change Bill & Environment Bill?					NPPF / NPPG changes?														
WCC milestones																Draft Reg 18 LP							

PROJECT PLAN SUMMARY																							
STAGE	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan 24	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan 25	
3. Aims, Vision & Objectives																							
4. Generate Options & Prepare Draft Plan										C5	C5												
5. Submission and 6. Post submission formal requirements													C6	C6	C6				S →				
National milestones																							
WCC milestones																							

Notes: see over.

Appendix 2: Letter sent to Denmead Parish Council regarding the Options consultation



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Denmead Neighbourhood Plan Steering Group
Denmead Parish Council
The Pavilion
Southwick Road
Denmead
PO7 6XT

29 October 2024
PNH/DEN.NP

Dear Sir or Madam,

Re: Denmead Neighbourhood Plan – Options Consultation

It has recently come to our attention that the Denmead Steering Group are undertaking a public consultation on which sites to allocate in the emerging update of the Denmead Neighbourhood Plan. We have a number of concerns about the consultation which I have set out below:

Exclusion of businesses with interests in the area

PNH have business and landowner interests in Denmead Parish and thus have knowledge and experience that could be of benefit to the Parish as it seeks to bring forward plans to guide the future growth of the area. PNH therefore note with disappointment that the consultation material specifically states that “only comments from residents will be considered” and further that “only people that live in the village, or near the village are eligible to comment on development in the village”. You have indicated that you will employ a verification process to ensure that comments on the consultation are restricted to residents and so have effectively excluded non resident interested parties with legitimate interests in Denmead from joining this very important conversation.

The Planning Practice Guidance expects Neighbourhood Plan groups to be inclusive and open in the preparation of their neighbourhood plans and to ensure that the wider community is:

- kept fully informed what is being proposed
- is able to make their views known throughout the process
- has opportunities to be actively involved in shaping the emerging neighbourhood plan
- is made aware of how their views have informed the draft neighbourhood plan

(Paragraph: 047 Reference ID: 41-047-20140306)

PNH do not feel that this Government requirement is being adhered to. In addition, by excluding organisations and people with legitimate interests in the Parish at such an important stage in the plan preparation the Steering Group is eroding its ability to draw on that local expertise to help produce a plan that is robust in its evidence and preparation approach.

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Employment of a policy on-approach

When undertaking an assessment of land availability and assessing sites for allocation it is normal that this is done on a 'policy off' basis. PNH are concerned to note that policy (in the form of the Denmead Waterlooville settlement gap) has been applied by AECOM at the very initial stage of the assessment to exclude 14 sites that lie in the gap. As a result, the suitability, deliverability and achievability of each of these sites was not considered further, effectively robbing the community of the ability to consider whether any of these sites could assist in achieving some of its wider objectives. PNH are very much of the view that by using a design and landscape led approach it would be possible to re-inforce and enhance the gap whilst also ensuring that housing and other wider community benefits could be delivered.

It is worth noting that the National Planning Policy Framework does not include policy for settlement gaps and the emerging policy in the Winchester Local Plan 2020 -2040 states that development should not "undermine the function of the gaps and its intended role to define and retain separate identity of settlements". This is a more flexible and pragmatic approach by the Council, enabling wider policy objectives relating to delivery of housing and infrastructure to be achieved whilst ensuring settlements do not coalesce. PNH believe that development could be accommodated on their sites in a way that would meet objectives relating to housing and infrastructure delivery whilst also delivering significant benefits to the community in the form of:

- Improvements to the appearance of the countryside
- Maintaining the separation of Waterlooville and Denmead through the creation of in perpetuity accessible, nature rich public open space
- Potential improvements to flooding across the wider area; and
- Community infrastructure.

Impact of uncertainty over future WCC Local Plan progress

The Steering Group will be aware that the consultation of the Regulation 19 Winchester Local Plan has only just concluded and there is considerable uncertainty around when the plan will progress to the next stage of plan making, and what that stage might be.

As the Parish will be aware, the Labour Government have finished a consultation on proposed changes to the NPPF and the Standard Methodology to calculate local housing requirements. The Government are currently considering the responses they received on the consultation and it is expected they will publish the new NPPF and Standard Methodology in late December/January 2025. In Winchester's case, the proposed Standard Methodology raises the housing requirement for the district by an additional 343 dpa. This is a significant increase and, if the changes are introduced in the current proposed form, could result in Winchester having to:



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- Find a significant amount of additional housing capacity; and
- Return their plan preparation process to an earlier stage.

Clearly this will have a significant impact on Winchester, but it may also impact on the Parish. The PNH sites would be a valuable supply of sites in Denmead to take into account when numbers and spatial distribution are potentially being re-visited by the District, and potentially the Parish, in the coming months.

In conclusion PNH is disappointed that it has been excluded from the important consultation the Parish is taking on site options. They are concerned with the 'policy-on' approach that has been used by AECOM and the fact that it has excluded a useful supply of sites. Finally, the uncertainty surrounding the Winchester District Local Plan means that the sites excluded by the Parish on policy grounds could be essential in helping it and the District deal with the likely Government policy changes.

Yours sincerely,

[REDACTED]

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CC Winchester City Council Policy Team

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