

Winchester City Council
Winchester District Local Plan 2020 - 2024
Proposed Submission Regulation 19 Consultation

Written representations prepared on behalf of Bargate Homes Limited
October 2024

FOR001



1. Introduction

- 1.1 These written representations have been prepared by Nova Planning Limited (Nova) on behalf of Bargate Homes Limited (Bargate) in response to the Winchester City Council (WCC) Proposed Submission Local Plan (PSLP) for Regulation 19 Consultation. The comments set out in this document relate to this publication of the Local Plan and its supporting evidence base, including the Integrated Impact Assessment (IIA).
- 1.2 Bargate is promoting Land South of Forest Road in Denmead (the Site) for residential development. Details of the Site have previously been submitted to WCC as part of its Regulation 18 consultation and to Denmead Parish Council in respect of the Neighbourhood Plan update. The Site was assessed in the WCC Strategic Housing and Economic Land Availability Assessment (SHELAA) published in July 2023 under Site Reference DE05 and was considered to be both deliverable and developable.
- 1.3 The Site is located in the south-western part of Denmead, accessed from Forest Road to the south. The Site is sustainably located close to existing services and facilities in Denmead, which are easily accessible to future residents and can be reached via a short walk or cycle ride.
- 1.4 Bargate has prepared a Vision Document to explain the proposals for the Site which are based on the principles of the 20-minute neighbourhood. The proposals are for a residential development of approximately 80 dwellings (including affordable housing), incorporating public open space, a play area and a community orchard as well as landscaping and ecological benefits including biodiversity net gain. An extract of the draft proposals presented in the Vision Document is included in Figure 1 below and further details of the scheme are set out later in this document:



Figure 1 – Extract of Draft Proposals for the Site

2. Spatial Strategy, Settlement Hierarchy and Housing Distribution

- 2.1 Strategic Policy SP2: Spatial Strategy and Development Principles sets out the development strategy for the District. Bargate continue to support the Spatial Strategy which will be delivered by directing growth to Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Areas. The Spatial Strategy seeks to deliver the Council's current housing requirement in full, as well as some of the unmet need from other PfSH authorities.
- 2.2 Policy H3: Spatial Housing Distribution sets out how housing development will be distributed across the District. This establishes the Settlement Hierarchy, whereby housing provision is directed to the most sustainable settlements. Denmead is designated as a Larger Rural Settlement, reflecting the wide range of services and facilities in the village. While this hierarchical approach to the distribution of development is broadly supported, as set out later in these representations, it is considered that the amount of housing should be increased to reflect the facilities and services available in Denmenad. This could be effectively achieved by increasing the number of dwellings to be delivered through direct allocations.

3. Meeting Housing Need and Provision

NPPF Consultation 2024

- 3.1 The consultation on the Regulation 19 commenced whilst the government were consulting on the revised NPPF. Whilst the outcome of the NPPF consultation is not fully known, the changes proposed align closely with the Government’s objectives as set out in the Written Ministerial Statement entitled “Building the homes we need”. The revised NPPF will become the policy mechanism to fulfil the objectives of improving affordability, promoting growth and building 1.5 million homes over the next five years. It is reasonable to assume that the core changes that go to the heart of these objectives will be adopted as drafted or in wording very close to the existing drafting, when the revised NPPF is published later this year.
- 3.2 It is noted that the Council has brought forward its local plan timetable to seek to benefit from the proposed transitional arrangements set out at paragraph 226(c) the NPPF consultation document (2024). While proposed transitional arrangements contained within the revised NPPF will enable Council’s who have a plan at Regulation 22 stage to progress within an examination on the basis of existing housing need, it is expected that where a plan is found sound at examination, a review of that plan will be required straight away if its annual housing requirement is more than 200 dwellings lower than the relevant published Local Housing Need figure. This reflects correspondence from the Ministry of Housing, Communities and Local Government entitled “Playing your part in building the homes we need” dated 30th July 2024¹ where it states:

*For **plans at examination** this means allowing them to continue, although where there is a significant gap between the plan and the new local housing need figure, we will expect authorities to begin a plan immediately in the new system. (Nova underline for emphasis).*

- 3.3 So while meeting the current requirement in full, the plan will not meet the housing needs of the District upon adoption of the NPPF changes, as drafted. The changes to the Standard Method will see the housing requirement for WCC increase significantly from 676 pa to 1099 pa (a 62% increase), triggering the need for an immediate review of the Local Plan should it be found sound at examination. It is therefore important that the plan provides an appropriate strategy and timetable to enable a timely review of the

¹ [Playing your part in building the homes we need](#)

plan and meet this increased need; the requirements for which are set out in paragraph 33 of the NPPF (2023) and aside from the paragraph number, do not change under the 2024 proposals:

Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary¹⁸. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. (Nova underline for emphasis).

- 3.4 Accordingly, Bargate Homes consider that the plan should therefore be updated to include a positive commitment to commence a review of the Local Plan within 1 year of its adoption. This commitment is essential for a number of reasons, in particular regarding the interaction between local and neighbourhood plans and the setting of housing requirements and phasing, which is considered further below.

Policy H2

- 3.5 Bargate **object** to Policy H2: Housing Phasing and Supply, which seeks to phase the development of allocated greenfield sites until later in the plan period. This policy is not justified or effective in meeting the housing needs of the District and directing development to the most sustainable locations. It is contrary to the provisions of paragraph 60 of the NPPF (2023) which states,

To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.

- 3.6 The phased approach to housing delivery outlined in Policy H2, while intended to create a more even housing trajectory over the plan period, places an artificial constraint on Winchester City Council's ability to meet the broader housing needs of the sub-region. By prioritising brownfield development and holding back the release of greenfield sites until 2030, the Council is effectively capping the contribution it can

make to address the housing crisis. This strategy runs counter to the government's objective to significantly boost the supply of housing, as outlined in the NPPF and recent ministerial statement².

- 3.7 Although the Council's housing trajectory reflects some smoothing over time, it acknowledges that the effect is minimal. Larger brownfield sites, such as Sir John Moore Barracks and the Central Winchester Regeneration, will take years to come forward due to their inherent complexities—contamination, ownership issues, and remediation costs—all of which result in long lead-in times for delivery. In addition, brownfield sites generally deliver limited, if any, affordable housing due to the increased costs associated with their development. Consequently, delaying greenfield development until later in the plan period limits the Council's flexibility to respond to urgent housing needs now.
- 3.8 Furthermore, the NPPF (paragraph 76) removes the obligation for local authorities to maintain an annually updated five-year housing land supply for decision-making when their plan is less than five years old. This diminishes the likelihood that the conditions under which early release of greenfield sites might be permitted—such as overcoming a housing land supply shortfall—will be met, rendering the phased approach ineffective under the current NPPF.
- 3.9 Notwithstanding the proposals of the current incumbent government to reverse this recent change to the NPPF to re-establish the requirement for all local planning authorities, regardless of local plan status, to continually demonstrate 5 years of specific, deliverable sites for housing, it is considered that the WCC local plan should be updated to include a policy commitment to ensure a minimum 5-year supply (plus appropriate buffer) of deliverable sites across the district. This will both positively respond to the NPPF objective of significantly boosting the supply of homes (paragraph 60) and provide transparency to all parties when the Council will consider the early release of land, should phasing restrictions be maintained.
- 3.10 In essence, policies H2 and DEN1 unnecessarily restrict land supply at a time when housing demand is increasing, directly undermining the government's aim of boosting housing delivery and creating an uncomfortable situation for neighbourhood plans, necessitating work to allocate site(s) for housing that will not come to fruition in the in the 5-year period of the Local Plan. A mix of brownfield and greenfield development is crucial to ensure housing needs are met efficiently and sustainably, and therefore, the phased restrictions imposed by Policy H2 and DEN1iii should be deleted. A mix of brownfield and greenfield development will help ensure affordable housing needs are met (see paragraph 3.7 above).

² [Building the homes we need](#)

- 3.11 In the event that WCC should consider that the phasing restrictions are justified and effective, then direct allocations to Denmead should be made and there should be clear policy commitments to ensure a minimum 5-year supply (plus appropriate buffer) of deliverable sites across the district.
- 3.12 Finally, aside from the implications for the local plan and meeting housing need, this phasing requirement also has implications for the viability and deliverability of land, which is often subject to agreements with landowners regarding timescales for planning permission and/or implementation. Although this is a commercial rather than a plan-making factor, it provides further justification for the removal of phasing requirements.

Windfall Development

- 3.13 As set out in paragraphs 3.2 – 3.13 of Bargate’s representations on the WCC Regulation 18 Draft Local Plan, Bargate **object** to the Council’s high level of reliance on windfall sites to deliver the District’s housing need.
- 3.14 Table H2 of the PSLP shows that after existing completions, planning permissons and other commitments, the remaining requirement totals 4,770 new dwellings to be delivered through the plan. Of this, only 2,875 dwellings will be provided through additional local plan allocations. This equates to 60% of the remaining requirement while 1,985 dwellings will be delivered through windfall development. This equates to 40% of the remaining requirement and demonstrates an even greater reliance on windfall development than that proposed through the Regulation 18 plan. Bargate strongly **object** to this strategy. 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 indicate future availability and even if sites do come forward, it is on an ad-hoc basis undermining infrastructure delivery. For these reasons, which are explained in more detail in Bargate’s previous (Regulation 18) representations, it is not considered that a strategy based on a high plan-wide windfall allowance meets the tests of soundness set out in paragraph 35 of the NPPF. A heavy reliance on windfall sites is not plan-led and risks not meeting even the minimum housing requirements if windfall sites do not come forward as expected. As such, the strategy is not considered to be positively prepared, justified or effective.
- 3.15 Instead, the windfall allowance should be reduced and the local plan should increase the number of direct allocations to provide certainty. For the reasons set out below in Section 4 of these representations, a local plan allocation should made for Denmead to increase certainty and ensure that sustainable development is achieved.

4. Policy DEN1: Denmead

4.1 Bargate **object** to Policy DEN1 on the basis that it seeks to allocate only 100 new homes through the Denmead Neighbourhood Plan and that these will not be granted planning permission before 2030 (criteria iii).

4.2 Paragraphs 67 and 68 of the NPPF which do not change under the 2024 proposal, require the following:

Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

4.3 The current and emerging NPPF clearly requires housing needs for designated neighbourhood plan areas to be explicitly defined. While the Regulation 19 plan addresses this, it is based on housing requirements derived from a soon-to-be outdated standard methodology. If the plan is found sound at examination, the housing requirements for the WCC area will likely undergo significant changes. Consequently, paragraphs 67 and 68 of the NPPF will come into play, necessitating a re-assessment of the housing requirement for the Denmead neighbourhood plan area to ensure that if progressed the plan meets the basic conditions. This re-assessment will likely result in housing targets that exceed the current local plan allocation.

- 4.4 This shift creates practical challenges for both WCC and Denmead neighbourhood plan group. Not least because the emerging local plan obligates the steering group to invest public funds and resources into preparing a neighbourhood plan, knowing that the housing requirement will need immediate review. The investment required to define a new housing target, outside the normal Local Plan cycle and ahead of WCC’s own plan review, will strain resources. Even if a new housing requirement can be defined, it will then be necessary for the neighbourhood plan to assess the relevance of Policy H2’s phasing restrictions—an issue better suited to a comprehensive Local Plan review.
- 4.5 Even if paragraphs 67 and 68 of the NPPF were not engaged, and Denmead neighbourhood plan were allowed to proceed under the allocations of the Regulation 19 Local Plan, the phasing restrictions in Policy H2 would prevent any allocations from being implemented during the life of the plan. By the time these allocations could move forward, WCC should be nearing the end of its Local Plan review, at which point it would be necessary to assess whether the neighbourhood plan allocations align with updated housing requirements under the revised standard method and the broader strategic objectives of the Council. Thereby rendering the neighbourhood plan a wholly abortive exercise in respect of the allocation of land for housing, which would constitute a clear abuse of public resources.
- 4.6 In this context, Bargate Homes argues that it would be an inefficient use of public funds to impose such strategic considerations on the Denmead neighbourhood plan. Therefore, WCC should directly allocate the housing requirements for the neighbourhood plan area in the Local Plan, rather than relying on neighbourhood plans to do so. This would not prevent neighbourhood plans from progressing on non-strategic issues relevant to its area.
- 4.7 Alternatively, if Winchester allows Denmead neighbourhood plan to progress, the phasing restrictions in Policy H2 should be removed to ensure the plan is effective in the lifecycle of the Local Plan for the reasons set out Section 3 above.

Land availability in Denmead

- 4.8 A total of 19 sites have been identified through the IIA as being suitable for development in Denmead. Collectively these sites would deliver 1,121 dwellings in a Larger Rural Settlement with a good range of services and facilities within walking and cycling distances. Yet only 100 dwellings are to be allocated through the neighbourhood plan. This figure is not considered justified or effective in meeting the housing requirements of the District, particularly given an expected 62% increase in housing need on adoption of the revised NPPF and the Government’s objective of “significantly boosting housing supply”.

4.9 As demonstrated by the sustainability appraisals in the IIA and the settlement hierarchy (Policy H3) Denmead is a sustainable location. The availability of land, as evidenced through the latest SHELAA submissions, is high. Bargate therefore **object** to the limit of 100 dwellings set by the policy and consider this should be increased to reflect the sustainability merits of Denmead, the expected increase in local housing need and to ensure local services and facilities are supported and maintained by an active local community. Importantly, Denmead also has the potential to assist WCC in accommodating the significant unmet needs in the region, particularly in Portsmouth and neighbouring Havant.

Windfall Development

4.10 The table on page 435 of the PSLP shows the sources of housing supply over the period 2020-2040. This includes a windfall allowance of 50 dwellings for Denmead. For the reasons set out in Bargate's previous representations (Regulation 18) and in Section 3 of these representations, a direct local plan allocation should be made for Denmead. This would provide certainty and ensure that development is directed to a sustainable location and that it is supported by an appropriate level of infrastructure.

5. Integrated Impact Assessment

5.1 The IIA has been prepared to include the SA and SEA requirements to support the preparation of the local plan. The SA appraises five options for growth, individual site allocations and local plan policies against sustainability objectives.

Options for Growth

5.2 Bargate **support** the findings of the options appraisal which concludes that of the options assessed, Option 1A forms the most appropriate basis of the local plan development strategy.

5.3 However, given the national requirement to significantly boost housing supply, it is considered that a further option should be considered: a higher growth scenario. This alternative option with a higher housing requirement should include more allocations overall, including more within the MTRA where it has been demonstrated that there is a sufficient supply of sites in sustainable locations. It would also take into consideration the unmet needs of other authorities, which as set out earlier, are significant. Notwithstanding this, Bargate does **support** Option 1A in that it seeks to deliver a relatively high number of small scale sites dispersed across different locations to meet housing needs. This element of growth is likely to help achieve faster completion rates and the overall higher level of growth is most likely to fully meet the needs of the District and surrounding local authority areas, resulting in less uncertainty. Should a further growth scenario be considered, it is suggested that the emphasis on a high number of small scale sites should be retained, for the reasons set out above and to help maintain local service provision as set out in paragraph 5.4 below.

5.4 Bargate also welcome increased growth, relative to other options, in the Market Towns and Rural Areas (MTRA). This will help limit the potential for the stagnation of rural service provision and avoid rural deprivation. It will help maintain and support new local service provision which might otherwise result in increased need to travel – reducing CO2 and travel emissions.

5.5 Conversely, options which focus growth on fewer, large allocations would not be supported. The SA notes the lengthy timescales and difficulties associated with strategic sites and/or new settlements and therefore, it is right that option 3 is not progressed.

Appraisal of Policy DEN1: Denmead Neighbourhood Plan Designated Area

- 5.6 The SA also appraises individual and groups of policies. There is some confusion over the policy reference in respect of the appraisal of Policy DEN1: Denmead Neighbourhood Plan Designated Area on pages 576 - 577 of the SA, where there is reference to D1 and NA3. This requires clarification/amendment.
- 5.7 The appraisal of DEN1 shows uncertainty in respect of a number of the objectives; due to the fact that the precise location of site allocations is not yet known. This is despite the supporting text confirming that Denmead is a larger rural settlement with local access to a number of services where levels of CO2 emissions per commuter are lower than in other settlements (paragraph 5.183). Much of the uncertainty against environmental objectives (e.g. biodiversity and geodiversity, historic environment and landscape) can be avoided/mitigated through site selection and in this regard, it is noted that land to the north of Denmead is generally more constrained by these factors.
- 5.8 It is considered that the uncertainty reflected in the SA appraisal does not accurately reflect the sustainability benefits of the settlement and individual sites. This uncertainty could be reduced through direct, local plan allocations; the benefits of which are set out in Sections 3 and 4 of these representations.
- 5.9 Given the Council's conclusion that the most sustainable option for growth (Option 1A) promotes development in Market Towns and Rural Areas and that the SA confirms that Denmead is a sustainable location, it reinforces our view that an allocation of only 100 dwellings out of a capacity of over 1,100 dwellings, does not maximise the potential of the settlement or seek to "significantly boost housing supply" in sustainable locations.

Site Assessments

- 5.10 While sites are to be allocated through the Neighbourhood Plan, the SA appraises individual sites against the SA objectives. In addition, the Neighbourhood Plan Steering Group has commissioned a separate sites assessment (Aecom July 2024) which confirms that 19 sites, including DE05: Land South of Forest Road, are potentially suitable for allocation within the neighbourhood plan – providing capacity for 1,121 new dwellings. This is in addition to the existing neighbourhood plan allocations.
- 5.11 There is some concern that the SA of the local plan lacks granularity, resulting in overly generalised appraisals. Of particular concern is the blanket approach taken when assessing sites against objectives 1, 2 and 7. The same definitive distance criteria are applied to all three objectives and no weighting is

incorporated. A site which is 400 metres from a facility is assessed more favourably than a site which is 401 metres away when in reality, this would make no difference as to whether or not a car would be used for the journey. This definitive application of the criteria does not reflect the sustainability benefits of the Site South of Forest Road. As demonstrated in the Vision Document submitted as part of our Regulation 18 representations, the Site fully adopts the principles of a 20-minute neighbourhood, making it a highly sustainable location for development. The extract at Figure 2 below shows the wide range of facilities which are available within 20 a minute walk, with additional facilities including a GP, supermarket and secondary school all being available via a bus or cycle journey of less than 20 minutes.

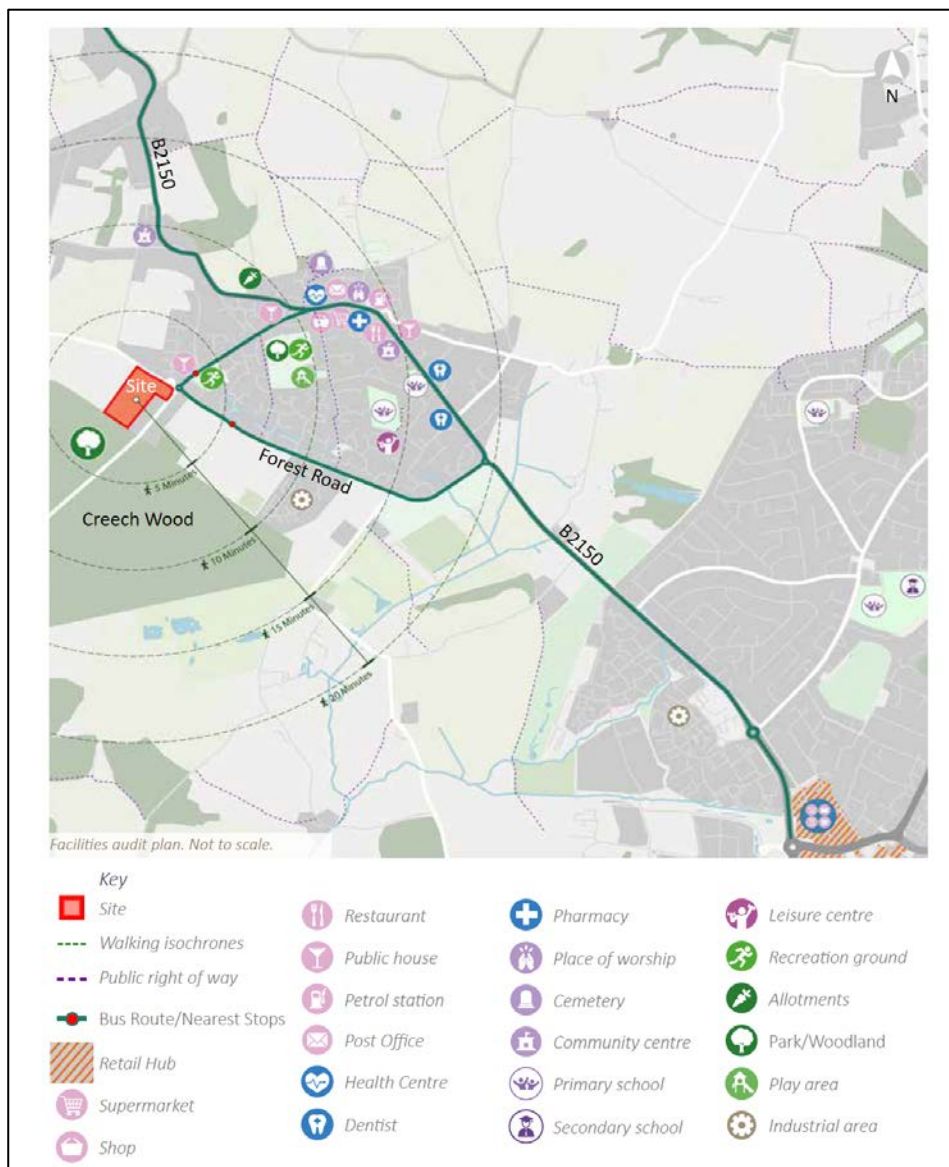


Figure 2 – 20 Minute Neighbourhood

6. Conclusion

- 6.1 In conclusion, the Winchester City Council Pre Submission Local Plan for Regulation 19 Consultation fails to provide a sound strategy on which to deliver new development to meet the District's housing requirements. An over-reliance on minimal neighbourhood plan allocations and windfall allowance will create uncertainty, undermine the delivery of new homes and associated infrastructure and mean that development is not directed to the most sustainable locations. It is therefore proposed that the windfall allowance is reduced to a minimal, plan-wide allowance and replaced with local plan allocations which are based on robust evidence and which have been properly considered through the plan making process.
- 6.2 For the reasons set out in these written representations, Bargate does not support the Council's constrained approach to housing delivery in Denmead. An increased housing requirement, through direct allocations, would better reflect the sustainable location and characteristics of Denmead and help ensure it is maintained as a viable community. It would also help address the predicted increase in housing need and tackle worsening affordability issues in the District.
- 6.3 For the reasons set out in these representations, Bargate does not support a phased approach for housing delivery on greenfield sites in general (Policy H2) and in Denmead specifically (Policy DEN1). This approach is unsound and should be deleted.
- 6.4 In conclusion, Denmead is a suitable and sustainable location (Larger Rural Settlement) to accommodate an increased housing requirement above that currently identified in the PSLP. The site controlled by Bargate South of Forest Road could provide an additional 70 - 80 dwellings in the settlement. The IIA and the separate sites assessment prepared by Aecom in support of the neighbourhood plan, confirm the Site's sustainability credentials, making it a suitable and appropriate location for development.