

WINCHESTER LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Personal Reference Number: ANON-
AQTS-32G7-V

Representor: Bargate Homes

Matter: 5

Site Allocation Methodology

Date: April 2025

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1.0 Introduction

- 1.1 This examination Hearing Statement has been prepared by tor&co on behalf of Bargate Homes (Personal Reference Number: ANON-AQTS-32G7-V) in respect of **Matter 5 – Site Allocation Methodology** of the Winchester Local Plan examination in public.
- 1.2 The comments made within this Statement respond directly to the questions set out in the Planning Inspectors Stage 1 Matters, Issues and Questions (ID13). and are presented in the context of the ongoing promotion of Land to the west of Salters Lane (SHLAA ref. SP01).
- 1.3 This Statement should be read in conjunction with the Bargate Homes Regulation 19 representations.

2.0 Response to the Inspectors Questions

Issue 1: 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

Q1. How have the proposed allocations been identified?

- 2.1 As outlined in supporting paragraph 11.2 of the draft Regulation 19 plan, *“in many cases, allocations in the existing development plan are being carried forward where they have not been substantially completed.”* In addition, *“the Council has undertaken a review of those allocations which do not yet have planning permission.”* It is acknowledged that *“in some cases development has commenced and may be substantially”* however these allocations have been carried forward nonetheless.
- 2.2 This overreliance on long-standing existing allocations, especially in the context of Winchester City, is reflected in the proposed Winchester Housing Sources table contained on page 307 of the draft Regulation 19 Plan. This identifies development capacity for 5,643, of which only 20% comprises new allocations. 879 dwellings have been notably included under the category *“Net completions in or adjoining settlements (2020-2023)”*. Further to comments made with respect to Matter 3 regarding the plan period, it is not appropriate to include already completed dwellings prior to adoption of the plan, especially on the basis that the plan period should be taken from the year of adoption in order to meet the minimum 15 year requirement contained in the NPPF. This would therefore clearly post-date 2023.
- 2.3 An over-reliance on sites already contained within the old adopted plan does not represent an ambitious or positive approach for Winchester City and its role in providing for current and future development needs. These long-standing existing allocations in many instances should have been delivered much earlier, however have been delayed due to a variety of reasons. Consequently, it is apparent that such sites were included within the adopted plan to accommodate previous housing requirements under the existing plan period, and not future need at this point in time. This approach is considered to be wholly inadequate in the face of the current unmet need pressure from the Partnership for South

Hampshire (PfSH) area and affordability challenge. With respect to affordability, there is a chronic issue within the district, set out in the SHMA (July 2024). Relying on existing allocations will not be sufficient, and will further compound the district's affordability pressures.

2.4 NPPF paragraph 11 states that *“plans should seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.”* This particularly applies to the proximity of Winchester City to the South Hampshire Urban Areas and the need to fulfil the PfSH strategy. Consequently, the plan should maximise opportunities to deliver housing across the district, especially around Winchester City which represents the district's most sustainable settlement.

2.5 Accordingly, the proposed methodology for site allocations is considered wholly inadequate for the district's needs, and is overly reliant on existing allocations. All deliverable sites in sustainable locations should be allocated in line with the settlement hierarchy and opportunities to access services, facilities and sustainable travel options. There is no clear basis as to why Land at Salters Lane has not been allocated, considering its proximity to Winchester City and on the basis that its location represents a natural and contained area for growth, adjoining existing development to the north, south and east.

Q2: Do they accord with the Plan's spatial strategy as set out in strategic policies SP1, SP2, SP3 and H1, H2, H3 and E1-E3, in terms of the overall provision throughout the District?

2.6 Bargate Homes support the principle of delivery of new housing and economic growth across the three identified spatial areas: Winchester City, the South Hampshire Urban Areas and the Market Towns and Rural Area. It is emphasised that all three spatial areas are considered critical to the district's growth requirements.

2.7 Notwithstanding, the proposed approach to allocations does not adequately fulfil either the potential housing supply or housing need in these spatial areas, and therefore does not align with the overarching vision and objectives of the spatial strategy. The over-reliance on existing allocations, and housing delivery before 2024, combined with only 20% of the housing supply for Winchester City comprising new allocations, underlines the current inadequacy of the proposed allocations. The constrained approach to site allocations renders the draft plan inflexible, and it cannot be said to be positively prepared in accordance with the NPPF requirement. With regard to the overall provision throughout the district, there is a clear and pressing case for additional allocations to be made, based on a far greater housing requirement than that allowed for within this draft Regulation 19 plan. This is principally based on the following basis:

- Expression of housing requirement: the housing 'target' should be clarified as a 'minimum requirement.'
- Plan period and housing requirement: the plan period should be re-set at 1st April 2024 and the housing requirement and provision set from that time (using 1st April 2024 as the base-date for the housing requirement and housing supply).

- Housing market/Affordable housing: An uplift to the SM LHN would be fully justified. The Housing Topic Paper fails to adequately justify why a further uplift is inappropriate in the context of Winchester.
- Unmet Need: the response is wholly inadequate, Winchester can and should do more to comply with the NPPF paragraph 11b) and Duty to Cooperate (including NPPF paragraphs 27 and 61).

2.8 Accordingly, the proposed approach to site allocations does not represent a sound or robust basis upon which to take forward the draft Regulation 19 plan. In line with the opportunities afforded by the overarching spatial strategy, additional site allocations should be included within the plan without delay which deliver on the district's growth requirements.

Q3: How were the site boundaries, areas and dwelling/other capacities determined? Are the assumptions justified and based on robust evidence? In particular, are the indicative residential capacities, set out in the Plan's site allocations justified by the evidence and consistent with NPPF paragraphs 123 to 126?

2.9 No comment.

Q4: How would the proposed allocations provide flexibility in the event that some sites do not come forward?

2.10 Contrary to NPPF paragraph 11, the current approach to allocations is neither flexible nor responsive to changing needs. The restrained approach to allocations will not adequately address the district's affordability challenge, meet local housing need and meet the unmet needs of the sub-region under the DtC.

2.11 The Regulation 19 plan as currently drafted is considered to be overly reliant on large brownfield sites. These sites have a longer lead-in time, and such sites are typically more complicated and therefore expensive to develop, which consequently puts pressure on the levels of community benefit, including affordable homes, that can be sustained without rendering such schemes unviable.

2.12 Critically, it should be recognised that a number of Winchester City's brownfield site allocations have not come forward, despite their allocation in successive local plans. For example, Policy W7 (Central Winchester Regeneration) is an existing Local Plan allocation (WIN4) that has been carried forward. This site was also allocated prior to the current Local Plan as Policy W.2 – Broadway/Friarsgate (Silver Hill) within the 2006 Local Plan Review, and yet has still not been delivered. Similarly, Policy W8 – Station Approach Regeneration Area is also an existing local plan allocation (WIN7) that has been carried forward, further reflecting the extended lead-in time for such sites. In addition, the proposed allocation at Sir John Moore Barracks (W2) assumes delivery of 900 homes within the plan period. As a part brownfield site, this level of delivery is considered overly optimistic.

2.13 On the basis that the assumed housing supply is wholly inadequate, it has not resulted from a positive response to the full housing need, taking into account:

- 15 year plan period from adoption (requiring an additional year)

- The SM LHN base-dated at 1 April 2024 (i.e. not unjustifiably adjusted for stated 'over-provision' in previous years)
- The unmet need from adjacent authorities
- The affordability crisis
- Realistic assumptions about delivery and risks of relying on old allocations, and brownfield sites without planning permission.
- Limited new allocations, unsupported by statements of developer intentions

2.14 In particular, once the unmet need of the SDNPA is considered (2,000 over the plan period), the unmet need allowance disappears, so not only is there no provision for Portsmouth and Havant but no flexibility should any of the assumed sites not come forward.

2.15 There is a clear case for allocating additional, particularly greenfield, sites in the most accessible and sustainable locations within the district.

Q5: In addition, for each site allocation the Council should provide evidence to justify their delivery within the Plan period.

2.16 No comment.

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

2.17 It is vitally important that the Council provides clear and robust evidence to justify the anticipated housing supply within each spatial area, including a breakdown of net completions, outstanding permissions, windfall allowances, development equivalents, Neighbourhood Plan allocations, extant commitments, and new site allocations.

2.18 Based on its reliance on brownfield sites, existing allocations and sites that have already been delivered under the existing plan period, combined with the requirement to accommodate the needs of the PfSH area, as well as the chronic affordability challenge within the district, then the assumed housing supply is considered insufficient, and over-optimistic. The exclusion of further sites for allocation, particularly adjacent to Winchester City has not been robustly evidenced in bringing forward this draft Regulation 19 plan. Land at Salters Lane represents a key opportunity adjacent to Winchester City, in a natural area for growth, accessible to key services and facilities and public transport modes. As set out in Matter 2, the Integrated Impact Assessment for the site remained unchanged between Regulation 18 and 19 stages, indicating that neither the supporting landscape appraisal, or the Zone of Theoretical Visibility (ZTV) had been taken into account in the Natural Resources category of assessment. Similarly, Land at Salters Lane had a comparable rating to the allocated site at Sir John Moore Barracks (W2), and yet has not been included as an allocation. This further questions the consistency and robustness of the council's housing supply assumptions, including regarding potential allocation sites.

