

WINCHESTER LOCAL PLAN EXAMINATION

Stage 2 Hearing Statement

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

Representor: Bargate Homes

Matter: 10
Homes for All

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 10 – Homes for All** 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 2 Matters, Issues and Questions (ED17), and are presented in the context of the ongoing promotion of Land to the west of Salters Lane (SHLAA ref. SP01), Land at Main Road, Colden Common (SHLAA ref. CC04), Land at Lower Moors Road, Colden Common (SHLAA ref. CC05), Land South of Forest Road, Denmead (SHLAA ref. DE05), Land at Forest Farm, Waltham Chase, Shedfield (SHLAA ref. SH09), Land at Lower Chase Road, Waltham Chase, Shedfield (SHLAA ref. SH11), and Mayles Farm, Mayles Lane, Wickham (SHLAA ref. W124).
- 1.3 This Statement should be read in conjunction with the Bargate Homes Regulation 19 representations.

2.0 Response to the Inspectors Questions

Issue: Would the housing policies H5-H11 be clear, justified and consistent with national policy and would they be effective?

Policy H5 Meeting housing needs

Q1: Would the size mix for market and affordable housing set out in policy H5 be justified by the evidence, particularly the Winchester Strategic Housing Market Assessment (HA01)? Would policy H5 provide appropriate flexibility to meet local evidenced needs? Should it provide further flexibility in relation to other matters such as site and local characteristics?

- 1.4 Bargate Homes supports the principle of the provision of a range of housing types and tenures, and recognises the importance of meeting housing need in accordance with most recent evidence. However, it is considered that the proposed size and mix for market and affordable housing, as set out in policy H5, is overly specific, and lacking flexibility. The mix of units to be provided on any site should be based on the latest SHMA and reflect local characteristics. Consideration should also be given to the implications of the criteria for the efficient use of land, their appropriateness for each site and the market for the homes to be provided.
- 1.5 Furthermore, the requirement for schemes of 50 or more homes to include an element designed and marketed to meet the needs of older persons, or other local specialist needs, must be applied flexibly and be based on a needs analysis supported by appropriate evidence. The SHMA update (July 2024) Table 5.7 states that there is currently a surplus of 529 specialist homes in WCC, which contradicts the need for specialist housing as required within Policy H5. As such, the policy as drafted is not supported by evidence and wording should be added to allow flexibility to the policy. Consideration should also be given to the impact of this requirement on the viability of a scheme.

Overall, Bargate Homes feel it is not appropriate to have any threshold as it is not appropriate.

- 1.6 In this context, it is further highlighted that a range of housing types and tenures could be delivered as part of the Land at Salters Lane development opportunity site, or equally, the other sustainable settlements where Bargate's other land interests/promoted land adjoin, in Colden Common, Denmead, Waltham Chase and Wickham. These sites would increase the range of housing types and tenures to be delivered in Winchester, making most efficient use of land and increasing the affordable housing offer.

Q2: Would policy H5 be effective in meeting demand for well-designed smaller homes?

- 1.7 No comment.

Q3: Would policy H5 requirements for specialist homes be justified by the evidence? Would policy requirements provide appropriate flexibility?

- 1.8 The requirement for specialist homes is not supported and justified by evidence. As noted above, the SHMA update (July 2024) Table 5.7 states that there is currently a surplus of 529 specialist homes in WCC, which contradicts the need for specialist housing as required within Policy H5.
- 1.9 The presence of this surplus suggests that the current demand for specialist housing has already been met, and continuing to mandate provision could lead to inefficiencies in housing delivery and vacant specialist units. In this context, Policy H5 appears overly prescriptive and risks being inconsistent with the actual housing needs identified in the latest evidence.
- 1.10 To ensure the policy is responsive to changing local circumstances and does not unnecessarily burden developers, it is recommended that the wording of Policy H5 be revised to introduce greater flexibility. This could include a clause allowing for site-specific viability and local need assessments to determine whether the delivery of specialist housing is appropriate in any given case. Such flexibility would allow the policy to better reflect current and future housing needs while maintaining the ability to respond to demographic or strategic shifts over time.
- 1.11 Further, the policy does not actually define specialist and supported housing (including older persons housing), nor is this explained in the supporting text. This is very onerous for developers trying to incorporate this housing into a scheme, and further adds to the inflexibility of the policy.
- 1.12 In summary, the current wording of Policy H5 is not justified by the most up-to-date evidence, and without appropriate modifications to introduce flexibility or removal of the 50 dwelling threshold, it may result in unintended consequences for housing delivery within the area.

Q4: What is the justification for the application of the nationally described space standard (NDSS)?

- 1.13 No comment.

Q5: What is the evidence that the Council has considered the impact of using the NDSS, in terms of Plan viability and any effects on the affordability of new homes?

1.14 No comment.

Q6: What is the justification for the application of the optional requirements for M4(2) accessible and adaptable dwellings and M4(3)(2)(a) wheelchair user dwellings?

1.15 No comment.

Q7: Would policy H5 be effective in enabling the Council to meet its statutory duty in relation to considering the needs of those wishing to build their own homes? Would those requirements be justified by robust evidence?

- 1.16 The self-build and custom housing requirement is not justified by the evidence. The policy stipulates there is a requirement for sites of 50 dwellings or more to offer at least 6% of serviced dwelling plots for sale to self-builders. The Winchester Self Build Position Statement (January 2025) acknowledges that there are 471 total interests on the Part 1 and 2 Register for self-build homes. When taking 6% for self-build and custom-build homes out of the housing target of 15,140 as set out in Policy SP2, this equates to well over the identified need, resulting in a figure of 908 dwellings (even allowing for custom-built homes as well). As such, the policy should be given more flexibility to allow developers to provide a lower amount of self-build or custom-build homes on certain sites. Self-build and custom homes are typically better suited to certain (i.e. standalone) sites, rather than being required on all sites (i.e. shoehorned in), where land has to be safeguarded within a wider integrated masterplan.
- 1.17 Bargate Homes, based on their extensive housebuilding experience, consider the proposed threshold of 50+ dwellings is too low, and provides a barrier to development for small-medium sized sites, and consequently acts as a constraint to much needed housing delivery. Whilst the aspiration is welcomed, it is considered that inclusion of this policy requirement is neither effective, nor likely to result in the delivery anticipated. This runs contrary to NPPF paragraph 73 which highlights that *'small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly.'* Policy H5, as currently drafted, will ultimately have the opposite effect.
- 1.18 As well as acting as a constraint to delivery, this policy will compromise the quality of design of residential-led development schemes coming forward. In safeguarding land, that may or may not come forward for self-build and custom housing, poses a significant challenge to the preparation of site-wide masterplans. The uncertainty associated with safeguarding land with unknown delivery, is likely to result in isolated parcels of land which are not well integrated within the wider masterplan. This does not align with the overarching design policies referenced elsewhere in the draft plan. Consequently, this reaffirms that standalone sites are better suited to accommodating self-build and custom housing.

- 1.19 It is further highlighted that self-build and custom building housing tends to be accommodated on larger plots, and will be at higher price point for market sale. Consequently, provision of self-build and custom housing will be less affordable and accessible in response to local housing need.
- 1.20 On a practical level, it is also noted that whilst the policy refers to self-build and custom build housing, it is ordinarily the case that only custom build housing can be accommodated on development sites. Self-build plots need to be accessed and serviced by individual construction teams, which poses challenges with coordination of construction traffic, and associated health and safety and liability issues. This therefore further reinforces the argument that self-build housing schemes are best suited on standalone plots.
- 1.21 Overall, the policy as drafted in relation to self-build and custom-build homes is overly rigid. The policy presents a barrier to development and is likely to discourage delivery, particularly on smaller sites where integrating self-build plots can be especially challenging. We consider that Winchester County Council (WCC) should not introduce mandatory requirements for developments of a certain size to provide a certain percentage or number of self and/or custom-build plots.
- 1.22 A more flexible approach—one that takes into account site size, local need, and viability—would be more appropriate. At the very least, the threshold for providing self and/or custom build housing should be increased to all sites of at least 300 new homes, rather than the threshold currently proposed of sites of 50 homes or more, which is far too low to be effective in delivering sufficient plots while avoiding unnecessarily restricting, or delaying, the delivery of new homes. Alternatively, Bargate Homes believes it would be more appropriate for WCC to allocate standalone sites specifically for self and custom-build housing.