



OCTOBER  
2024

# Land at Forest Road and Furzeley Road, Denmead

## Local Plan Representations

Iceni Projects Limited on behalf of  
Bewley Homes

October 2024

ICENI PROJECTS LIMITED  
ON BEHALF OF BEWLEY  
HOMES

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Land at Forest Road and Furzeley  
Road, Denmead  
LOCAL PLAN REPRESENTATIONS

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# 1. INTRODUCTION

This representation has been prepared by Icen Projects Limited on behalf of Bewley Homes to support the allocation of land at Forest Road and Furzeley Road, Denmead, in the Winchester Local Plan. The site is located southeast of Denmead, adjoining the settlement boundary, and benefits from minimal development constraints. It is surrounded by built form on three sides and plays a limited role in preserving open countryside. The site has no statutory environmental designations, making it highly suitable for development. It also enjoys good connectivity to local services, with a bus stop providing access to key areas such as Waterlooville and beyond. Both the Winchester City Council (WCC) SHELAA and the AECOM/Denmead Site Selection Document identify the site as being suitable for residential development in principle.

The proposed development would provide 100 residential units, 40 of which will be affordable, addressing the acute need for affordable housing in the area. According to Winchester's Strategic Housing Market Assessment (SHMA), there is a need for 368 affordable homes per year, making up 56% of the total housing requirement. Yet, the Local Plan's current policy sets a lower affordable housing target of 40%, and even this is unlikely to be fully met due to viability constraints. This leaves a substantial gap in housing provision, which contributes to the growing affordability pressures in the district. As of April 2024, there were 1,544 households on the Council's Housing Register, and the house price-to-income ratio stands at 13.19, significantly higher than regional averages. Ensuring an adequate supply of both market and affordable housing is crucial to addressing these issues, and allocating sites like the one promoted by Bewley Homes will help to meet these needs effectively.

Turning to the wider Local Plan, there are fundamental concerns about its soundness. The Plan underestimates the scale of housing need, particularly when it comes to unmet needs from neighbouring authorities such as Portsmouth and Havant. Winchester's current approach lacks sufficient flexibility to respond to these challenges, leaving the district unprepared to meet its housing obligations fully. Furthermore, the Plan's over-reliance on large strategic sites introduces risks to delivery. Large sites are often subject to delays or infrastructure constraints, meaning that smaller, more deliverable sites, such as the one at Forest Road and Furzeley Road, should play a larger role in the overall housing strategy.

The Local Plan also fails to demonstrate effective cooperation with neighbouring authorities, a key requirement under the Duty to Cooperate. Insufficient engagement has been made regarding the unmet housing needs in nearby areas, which undermines the Plan's ability to meet national policy requirements.

We have identified several issues with the current draft of the Local Plan and have recommended changes within these representations to make the Plan sound. By increasing the housing

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requirement and allocating smaller, sustainable sites like the one promoted by Bewley Homes, Winchester can ensure a more balanced and flexible approach to housing delivery. While the Plan is currently unsound, adopting these changes will help to remedy this and ensure the Local Plan is both effective and compliant with national policy.

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## 2. SITE AND ITS CONTEXT

### Site Description

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The Site is located to the Southeast of Winchester within Denmead. The Site is bounded to the North by Forest Road and to the East by Furzeley Road. The entire landholding comprises a total of approximately 7.8 hectares. One large field adjoining Forest Road is solely pasture land, and the second, further south, consists of a few paddocks which are used for the grazing of horses. In the south-eastern corner of the site there is Whitestone Stables Livery Yard, which by definition is Previously Developed Land, for it contains two stable blocks, a tack room, dry storage facilities, welfare facilities, a concreted area which includes parking as well as hard standing for trailers, and a large rubber surfaced manège, together with two further paddocks.

The Site is surrounded by residential properties to the north and to the west by a small business park and Denmead Grange care home facility. The south of the Site is covered by agricultural land and Creech Wood, similarly, the East of the Site is covered by agricultural land and some residential properties.

### Sustainability

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The site has good transport links relative to the area with a nearby bus stop on Forest Road which links the site to Waterlooville with service from bus 'D2' (1 bus per hour for most of the day). Additionally, bus 'D2' also links the Site to Victoria Road bus stop which provides access to the '8 the STAR' bus which provides frequent service to Cosham train station every 15-30 minutes. Cosham train station provides regular trains (every 15-30 minutes) to London in an hour and 35 minutes.

In comparison to other market towns and villages in Winchester, this represents a good standard of public transport accessibility.

The site also has good access to critical services and facilities as set out below.

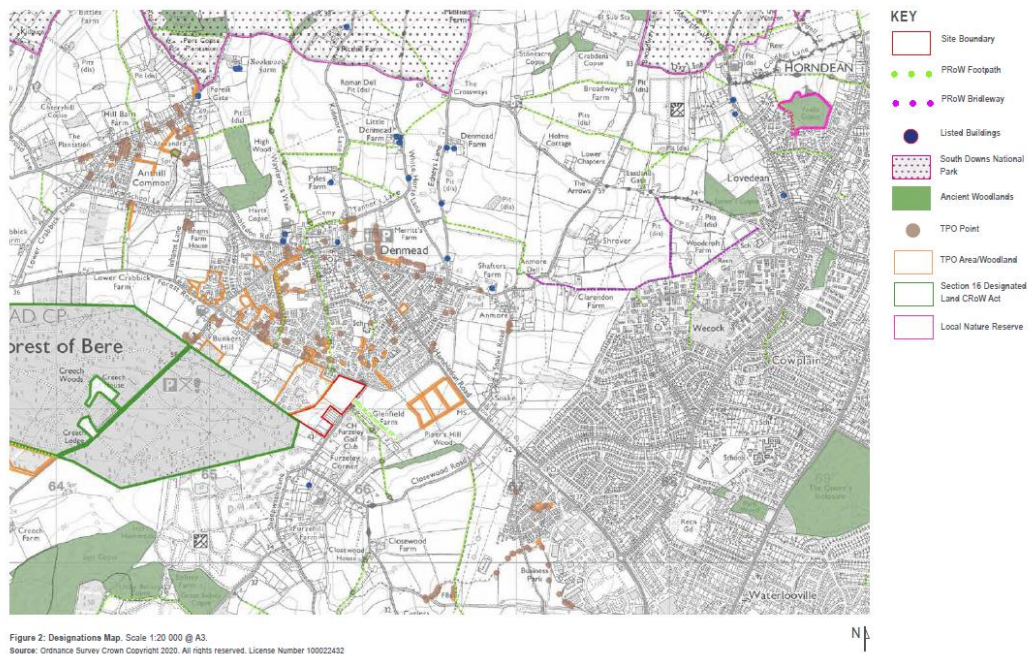
- Denmead Health Centre: Located on Hambledon Road, the Denmead Practice provides a wide range of healthcare services including GP appointments, nurse services, and specialist clinics such as well-baby and physiotherapy.
- Denmead Infant School and Denmead Junior School: These schools provide primary education within the village, offering a convenient option for families. For secondary education, students typically travel to nearby schools in Waterlooville and Havant.

- Denmead has a shopping area with a variety of shops, including a Co-op, pharmacy, and post office. There are also smaller independent shops, three pubs, cafes, and restaurants catering to daily needs.
- The village offers recreational facilities such as King George V playing fields, which include a playground, tennis courts and sports pitches. There are also opportunities for outdoor activities with Creech Wood nearby for walking and nature trail.

## Site Designations

The site has limited constraints. It adjoins the settlement boundary and the existing built form to the north, east and west of the site means that the site serves a limited purpose in protecting open countryside. There are non-statutory designations in the surrounding area, but not on the site. This includes the TPOs covering the whole of Parkland Business Park, to the West of our site. Additionally, it is in proximity to Creech Woods, a Site of Importance for Nature Conservation (SINC) and ancient woodland on Furzeley Golf Course. Figure 2.9 below reflects the designations on site. As highlighted in our submitted ecology and landscape assessments, neither of these designations should constrain development of the site.

Figure 2.9 - Designations map



Notably, both the WCC SHELAA and AECOM/Denmead Site Selection process consider the site to be developable and deliverable in principle, with none of the constraints preventing the development of the site.

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### 3. THE PROPOSED DEVELOPMENT

The development proposes 100 units of residential dwellings, of which 40 will be affordable to meet the acute local housing need. The landscape-led approach is shown within the attached masterplan documents. As set out below, Bewley Homes (the developer) has an excellent track record of delivering high-quality new homes which are sensitive to their surroundings.

The scheme will also deliver much-needed new allotments and amenity space for local residents. Furthermore, a new SUDs feature will be implemented enhancing the biodiversity of the Site as part of Bewley's commitment to deliver a 10% Biodiversity Net Gain.

The site's proximity to the residential dwellings in the surrounding area allows the proposed development of 100 residential units to sit comfortably within the existing built form.

With regards to transport and accessibility, the development will enhance access to Forest Road by introducing a new crossing and footway, creating safer pedestrian routes for residents. The provision of pedestrian access to the existing Wayfarers Walk, along with alternative routes, encourages active lifestyles.

Additionally, this development will deliver a 75% improvement over energy efficiency requirements, promoting sustainability and reducing environmental impact.

#### **Bewley Homes**

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Bewley Homes is recognised as a quality developer in Berkshire, Buckinghamshire, Hampshire, Oxfordshire, Surrey, Sussex and South London and has been designing and building high quality, homes in some of the most desirable locations across the South East of England for over 30 years.

The Bewley Homes story is not just about building houses. Since its formation, the company's ethos of responsible development has created an enviable award-winning reputation for excellence and innovation. Today, Bewley Homes is widely recognised for contemporary design, imaginative redevelopment and restoration and for the way it meets the aspirations, personal preferences and changing life-styles of homebuyers. Whatever the price range or house style, each Bewley home is built in a carefully selected location and designed to complement its environment while meeting the practical requirements of everyday living. Quality and imagination combined with a close attention to detail are the key factors that have enabled Bewley Homes to secure its strong reputation for excellence.



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The company firmly believes in working with local communities to achieve the best planning and design solutions. Its portfolio of award winning developments has played a crucial role in building relationships, confidence and planning permissions.

### **Additional evidence-based documents**

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Bewley Homes have produced landscape and ecology statements to support development on the site, these are summarised below.

### **Landscape**

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The Landscape Statement assesses the potential landscape and visual impacts of the development site, aiming to inform the masterplan. Key aspects of the statement include:

- **Landscape Character and Setting:** The document outlines the landscape characteristics of the site, highlighting its agricultural nature and semi-rural location. It is bordered by Forest Road and Furzeley Road, with the nearby Creech Woods contributing to the landscape's wooded character. The site is relatively flat with small hedgerows and trees providing a sense of enclosure. The overall assessment finds the site to be relatively low in landscape sensitivity, although it does form part of the wider setting of Denmead.
- **Visual Impact:** The visual analysis concludes that views into the site are limited due to the existing hedgerows and nearby woodlands. The document recommends that development could be accommodated with appropriate screening to mitigate any adverse visual impacts.
- **Capacity to Accommodate Development:** The report finds that the site has a good capacity for development, with opportunities for enhancement through landscape planting, particularly along boundaries. Development should be carefully integrated with the surrounding landscape to avoid impacting views towards the nearby Creech Woods.
- **Key Mitigations:** It recommends maintaining existing trees and hedgerows and enhancing green infrastructure to integrate the development within the landscape.

### **Ecology**

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The Preliminary Ecological Appraisal (PEA) (August 2024) identifies no overriding ecological constraints to development on the Denmead site, but outlines specific actions to mitigate potential impacts on local wildlife:

- **Retention of Existing Vegetation:** The PEA recommends retaining the boundary vegetation, and trees, which provide important habitat for foraging and dispersing species.

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- **Further Surveys:** Additional surveys for bats, badgers, dormice, breeding birds, reptiles, and great crested newts are recommended to inform the Ecological Impact Assessment (EclA). These surveys will provide a clearer understanding of how to protect these species during development.
  - **Opportunities for Ecological Enhancement:** The development offers opportunities to improve biodiversity, such as through habitat creation or enhancement, improving green infrastructure connections, and providing nesting boxes for birds and bats

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## 4. SUMMARY OF PREVIOUS REPRESENTATIONS

In the following section, we set out the main comments made in our representations and the response from the Council. Our Reg 18 Consultation Response is appended for reference.

### **Housing Target and Standard Method**

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Representation (Regulation 18): We previously noted concerns regarding the under-provision of housing based on the Standard Method. It was recommended that the housing target be increased and that a 10-20% buffer be introduced to safeguard against delivery issues.

Regulation 19 Plan: The Regulation 19 document maintains a housing target based on the Standard Method, though no explicit buffer is included. The plan emphasises flexibility but does not significantly increase the housing targets to account for potential delivery risks. It acknowledges challenges but focuses on the projected demand of 15,115 homes.

### **Unmet Housing Need from Neighbouring Authorities**

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Representation (Regulation 18): There was a strong push for Winchester to take on more of the unmet housing need from nearby authorities, particularly Portsmouth and Southampton, arguing that the current plan falls short in this regard.

Regulation 19 Plan: While the Regulation 19 Plan recognises cross-boundary housing needs, it continues with the planned level of unmet need accommodation from Regulation 18. The Partnership for South Hampshire (PFSH) framework and Statements of Common Ground are referenced as key mechanisms, but the housing allocations to meet unmet needs have not been significantly increased.

### **Housing Allocations for Denmead**

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Representation (Regulation 18): Concerns were raised about the insufficient housing provision for Denmead, suggesting an increase in allocation to address both local needs and unmet needs from Portsmouth. Emphasis was also placed on affordable housing delivery.

Regulation 19 Plan: The Denmead housing allocation was modestly adjusted to 345 homes from 330 in Regulation 18, which still falls short of the increase recommended in the representation. There is a continued focus on affordable housing, but the specific concerns around unmet need from Portsmouth in Denmead remain largely unaddressed.

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## **Reliance on Large Strategic Sites**

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Representation (Regulation 18): The over-reliance on a few large strategic sites such as North Whiteley and West of Waterlooville was criticised. A more diversified supply strategy, incorporating small and medium-sized sites, was recommended to mitigate the risk of delays or non-delivery.

Regulation 19 Plan: The Regulation 19 Plan continues to prioritise large strategic sites, with North Whiteley and West of Waterlooville remaining central to the housing strategy. However, there is more focus on identifying additional smaller sites to supplement the large strategic areas, reflecting a partial response to concerns about diversification.

## **Duty to Cooperate**

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Representation (Regulation 18): The representation criticised the Duty to Cooperate processes, particularly the lack of formal Statements of Common Ground and clear cross-boundary planning with neighbouring authorities like Portsmouth and Southampton.

Regulation 19 Plan: The Regulation 19 Plan indicates that Statements of Common Ground have been developed and are available online. However, the document acknowledges ongoing challenges in addressing unmet housing needs across boundaries, without significant revisions to how this need will be accommodated.

## **Strategic Locations for Growth**

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Representation (Regulation 18): Specific growth areas, including West of Winchester, Waterlooville, and Denmead, were recommended as strategic locations to accommodate additional housing growth due to their transport links and proximity to major urban centres.

Regulation 19 Plan: These areas remain part of the growth strategy. Denmead is still slated for development but well below the levels recommended in the evidence base, and the West of Waterlooville and North Whiteley sites continue to be highlighted as key areas for accommodating future growth. However, there has been no significant revision or expansion of these growth areas compared to the earlier plan.

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## 5. REVIEW OF EVIDENCE BASE DOCUMENTS

In the following section we review the newly released documents and their implications for the Local Plan.

### **Housing Topic Paper**

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The Housing Topic Paper covers a number of different issues which we discuss below.

#### **Housing Requirement**

The Plan continues to rely on the Standard Method (SM) as the starting point for calculating housing need, with adjustments reflecting the latest figures for Winchester. The paper also addresses comments about potential alternatives to the SM but concludes that it remains the best approach.

There has been a slight decrease in the SM figure since the Regulation 18 Plan (from 715 dpa to 676 dpa). We have no issue with the use of the SM figure, but would advise on the provision of a buffer of 10% - 20% to avoid any supply side issues as discussed in later sections.

#### **Affordable housing**

The paper highlights the continued challenge of meeting affordable housing need, noting that the Strategic Housing Market Assessment (SHMA) identifies a need for 368 affordable/social rented dwellings per annum, which constitutes 56% of the overall housing provision.

A 40% affordable housing requirement is maintained, though this is lower on brownfield sites and subject to viability. The housing requirement as currently proposed therefore locks in the Council to under provision against its affordable housing need.

#### **Phased Housing Delivery**

Housing development is divided into three periods as below, which is based on 676 dwellings per annum (dpa) as the housing target.

##### **Early Phase (2024–2029)**

Expected Completions: 1,000+ dpa in the first two years (2024-2026), followed by a decrease to 700-900 dwellings per annum by 2029.

The reasoning for this is that the early completions are largely committed from existing sites, including large strategic sites like North Whiteley and West of Waterlooville, which are well underway. The

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early phase focuses on utilising already planned developments and delivering high volumes before infrastructure constraints become more prominent.

**Mid-Phase (2029–2034):**

Expected Completions: 500-600 dpa in most years, decreasing as existing sites are completed and fewer new sites are brought forward.

The justification for this is the mid-phase reflects a slowing down of completions as key large sites near their later stages, and new smaller sites are phased in. There are no significant new greenfield sites allocated until after 2030 due to infrastructure constraints (e.g., nutrient mitigation) and market absorption concerns.

**Late Phase (2034–2041):**

Expected Completions: 200-300 dpa in the final phase.

The Housing Topic Paper states that as the Local Plan period ends, the rate of delivery slows significantly due to the near completion of all large strategic sites and the smaller allocations being developed. This phase anticipates that the housing requirement will be largely met, allowing the council to focus on maintaining a balanced land supply without overcommitting.

*Commentary*

The stacking of housing delivery towards the early part of the plan and much lower delivery towards the end of the plan period is based on the fact that existing sites are already delivering units and will continue through the early part of the plan process. While we do not object to this in principle, it does highlight that the housing market could accommodate more growth at the back end of the plan period to ensure a more steady stream of units.

Furthermore, the late phase delivery will be 200-300 dpa, while the SM will be 1,099 dpa. The Council is hoping to avoid according to this new SM figure, by submitting their Local Plan within 1 month of the NPPF being adopted, but the outcome for this will be a delivery rate of less than 20% of the SM figure for the District at the back end of the plan. This will be a significant mismatch of need and delivery in the district leading to greater affordability issues.

**Duty to Co-operate**

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The Duty to Cooperate requires Winchester City Council to engage with neighbouring local authorities, such as Portsmouth, Southampton, and authorities within the Partnership for South Hampshire (PfSH), to address strategic housing, infrastructure, and environmental issues.

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A key concern highlighted in the Housing Topic Paper is the unmet housing need from Portsmouth and other nearby urban areas. Under the Duty to Cooperate, Winchester is expected to consider accommodating a proportion of this unmet need.

#### **Unmet need from Portsmouth**

Winchester has included a specific allowance of 1,450 dwellings in its housing target to assist with unmet needs in the PfSH area, although this remains a modest response compared to the scale of unmet need identified in Portsmouth (estimated at 3,577 homes). While we understand that Fareham, will accept some of this need, it is unclear what will happen to the remaining level of need.

Importantly, Portsmouth's SM figure increases from 897 dpa to 1,098 dpa under the NPPF consultation. This will mean more housing growth will need to be accommodated within Winchester than currently proposed. We therefore conclude that the Local Plan is unsound on the basis that the Council has not discharged its duty to co-operate with neighbouring authorities on the basis that not all of Portsmouth's unmet need is addressed.

#### **Unmet need from Havant**

Iceni contends that Winchester's Local Plan does not sufficiently address the substantial housing need shortfall in Havant. The shortfall, outlined in the Statement of Common Ground (SoCG), highlights a significant gap of over 11,000 homes. This figure is expected to rise considerably to over 16,000 homes if changes to the SM method are implemented. Despite this growing pressure, Winchester's response in the current Local Plan remains limited, offering only a small buffer of 1,450 homes, which is not proportionate to the scale of the challenge.

We are also concerned about Winchester's approach to the Duty to Cooperate. There has been little meaningful engagement between Winchester and Havant during key stages of the Local Plan's development, particularly between the Regulation 18 and Regulation 19 consultations. This lack of collaboration undermines the requirement for ongoing and constructive dialogue between neighbouring authorities to manage shared challenges such as housing shortages. Havant has raised concerns that their earlier feedback has not been addressed, which casts doubt on whether Winchester's plan meets the obligations set out in the Duty to Cooperate.

Another issue is the failure to reconsider Winchester's overall spatial strategy in light of the unmet housing need in Havant. Instead of adjusting its housing targets to accommodate a greater share of Havant's shortfall, Winchester has relied on a relatively modest buffer. Iceni believes this approach is insufficient given the broader housing crisis affecting South Hampshire. A more thorough examination of potential housing increases, along with a strategy to address unmet need, would have strengthened the Local Plan and made it more robust.

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This situation is likely to become more critical as Havant's housing need increases due to revisions in the Standard Method for calculating housing requirements. The revised figures show that Havant's annual housing requirement could rise from 508 to 874 dwellings per year, deepening the housing deficit. Given Winchester's lesser constraints compared to Havant, we argue that it is logical for Winchester to take on a greater share of the additional housing demand.

Finally, we highlight that while Winchester has included a small buffer of 1,450 homes, this is insufficient to meet the expanding housing need. There should have been more substantial engagement with Havant and other neighbouring authorities to accurately determine how Winchester could assist with this unmet need. Without a stronger, more proactive plan in place, the Local Plan fails to provide an effective response to the housing pressures facing the South Hampshire region.

### **Sustainability Appraisal (SA)**

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The SA identifies a number of key issues with the plan that need to be mitigated. This is examined below

#### **Key Issues for Plan Delivery:**

- Nutrient pollution from both agricultural runoff and urban development poses a major challenge. New development must meet nutrient neutrality requirements to avoid impacting ecologically sensitive water bodies.
- Delivering infrastructure (e.g., roads, schools, healthcare) to support housing growth, particularly on larger sites like North Whiteley, is critical. There are concerns about timing and funding for necessary infrastructure.
- Achieving the target of 40% affordable housing is challenging, particularly in rural areas. Viability constraints on some sites may reduce the proportion of affordable homes delivered.
- The delivery of housing and infrastructure will be phased over the plan period. Monitoring mechanisms are in place to track progress and ensure that key sustainability targets are met.

Of these key issues, we note that the Local Plan is not likely to be able to deliver the full amount of affordable housing identified in the evidence base. This is a major issue with the plan and is not properly assessed within the SA. There is no option which considers setting a housing target which would address the affordable housing need in full, by increasing the housing target accordingly. This means that the Local Plan is not based on a robust SA and thus does not comply with the relevant statutory Instrument.



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We therefore conclude that the Local Plan is unsound as it is not based on a robust SA as required by legislation.

### **Site Selection Strategy**

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The Site Selection Strategy assesses numerous sites proposed for development in the Local Plan. These are examined in turn below, but we note that the methodology does not look at the potential for coalescence with St John's Barracks site, even though it will completely close the gap between Littleton and Winchester. This should be properly assessed within the evidence base document.

The document also does not consider the deliverability of the site, despite the fact it is currently operated by the Ministry of Defence and the decision to vacate it has been delayed numerous times.

### **Local Plan Viability Assessment**

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The viability report indicates that while 40% affordable housing is achievable on greenfield sites in many parts of the district, challenges exist, particularly for PDL sites and in areas like the Itchen Catchment Area, where nutrient neutrality costs significantly affect viability. The report recommends a differential approach to affordable housing targets to balance the need for affordable housing with the financial realities of development. It is clear that the local Plan will only have 40% as an aspirational target and a much lower level of affordable housing will be delivered in the District.

The report notes that the housing market experienced price increases in the latter half of 2023 and early 2024, and it refers to projections from Knight Frank that expect a 3% rise in house prices in 2024, followed by low-level single-digit growth in subsequent years. Overall, cumulative growth is expected to reach around 20.5% by 2028.

The report assumes that house prices in Winchester will continue to rise, with new-build values in the district ranging from £4,500/m<sup>2</sup> to £6,500/m<sup>2</sup> depending on the location. This level of growth is extremely ambitious and would be reliant on a rapid decrease in interest rates to allow more potential purchasers to be able to fund increasing sales values. The report does not discuss this point and it is considered that the report needs updating to fully justify the proposed house price increases, which underpin assumptions on the delivery of 40% affordable housing.

### **Soundness Summary**

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There are three clear points where the Local Plan based on the above issues with the evidence base this is:

- The SA is not robust and thus the Local Plan does not meet the relevant legal requirements.

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- The Council has not discharged the duty to co-operate and therefore is unsound on the basis it is not consistent with national policy or positively prepared.
  - The Local Plan Viability Assessment, Site Selection Strategy and Housing Topic Paper are not robust documents and therefore the Local Plan is not justified by a proportionate evidence base.

The issues raised above, also impact on other soundness issues in the Local Plan which are highlighted in other elements of these representations.

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## 6. HOUSING REQUIREMENT – POLICY H1

We do not consider that the Council's housing requirement set out Policy H1 (Housing Provision) is sound for the reasons set out below.

### **The need for a Supply-Side Buffer**

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We consider a buffer for slippage non-implementation is required due to the proposed make-up of the supply of sites within the District.

The Local Plan includes a number of sizeable allocations, including:

- North Whiteley – 3,690 dwellings (from 2021 onwards)
- Land at Barton Farm, Winchester – 2,000 dwellings
- West of Waterlooville – 1,650 dwellings (from 2021 onwards)
- Sir John Moore Barracks – 750 to 1,000 dwellings

This amounts to around half of the total supply within the District coming from just 4 sites.

At West of Waterlooville, the required delivery rate is 92 dwellings per annum over the remaining plan period to deliver the allocation requirement. This is in line with the most recent year of monitoring delivery (2020/21), which was during buoyant market conditions. Given the current instability in the housing market and the potential for a long period of recession, we do not consider that relying on previous rates of delivery is appropriate. The current implications of higher interest rates (which are unlikely to be significantly reduced, even in the medium term) are unclear and will take some time to be widely understood. We consider a more cautious approach to housing delivery is justified.

It is similar story at North Whiteley where a delivery rate of 205 units is required in line with the most recent year of recorded delivery (2020/21). For this larger site, which is responsible for one quarter of the total level of supply, the margin for error is much tighter, even smaller deviations from this delivery rate would be very significant impact on the Council's ability to deliver on its housing target. For example, even a 10% under delivery on this site alone, would result in a shortfall of 369 dwellings within the District.

While work has already started on two of these sites, the Barracks site is not due for decommissioning until 2026. Even in the most optimistic scenarios, the first units are unlikely to be delivered before 2027, which assumes the Ministry of Defence sticks to this date with no slippage.

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While no trajectory for delivery is provided in the Local Plan, with only 12 years to run until the end of the Local Plan, this would require a deliver rate of over 80 dwellings per annum. This is ambitious for a scheme of this size, where only one developer is likely to be bringing forward the units. We would suggest a figure of 50 dwellings per annum is more appropriate against a start date of 2029. This would reduce the figure in the allocation to 500 units over the plan period

Given the above, we consider that there is a very strong justification for building in supply side flexibility on top of the Council's housing target. In our experience, this is standard practice. By providing a wider range of sites that come forward over the plan period, they can guard against a slowing of delivery rates that appears almost inevitable in the current in the current economic circumstances. In addition, the Council should seek to allocate small sites which could support early delivery.

We consider that along with the additional demand side flexibility amendments set out in the previous sub-section, proposed supply flexibility of a 10%-20% buffer is also justified and necessary to make the plan sound.

Failure to amend the plan as proposed below would render the plan unsound against the 'tests' set out in paragraph 182 of the Local Plan for the following reasons:

- It would not be 'positively prepared' as it would not be based on a strategy which seeks to meet objectively assessed development or include sufficient sites to meet the likely level of demand.
- The housing requirement in relation to the Standard method, would not be 'justified' as there is no reason to seek to meet the need in full. The absence of a supply-side buffer is also not properly justified.
- The approach would not be consistent with national policy as highlighted above.

### **Inability to meet affordable housing need in full**

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As highlighted in previous sections, the housing requirement will be insufficient to meet the affordable housing need of the District in full. The total affordable housing requirement of the SM is 56% of the overall housing provision. The Council's affordable housing target is 40% and as established in this document, this will not be achieved. As such, the Council will be fortunate if even half of the affordable housing need is met in the District. This will have a drastic impact on the already acute affordability issues in Winchester, as highlighted by the following facts from the Council's own SHMA.

- Housing Waiting List: As of April 2024, there were 1,544 households on the Council's Housing Register. Most of these households (79%) were in Band 3, which reflects medium priority for housing needs.

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- House Price to Income Ratio: In 2023, the median house price to income ratio in Winchester stood at 13.19. This means the average house price is over 13 times the median income, indicating significant affordability pressures in the District.
  - Over the last 10 years, house prices in Winchester have increased by approximately 64.76%.

### **Soundness Summary**

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The Housing Requirement is unsound because it fails to meet affordable housing need in full and does not provide sufficient flexibility for supply-side issues that could mean the Council undershoots its SM figure.

In terms of the tests of soundness, the Local Plan is not positively prepared or effective.

To remedy this the Council should increase the housing requirement by at least 10% to cover the supply-side issues and a further 10% to bring it closer to meeting affordable housing need. The very limited level of supply in the later stages of the plan could be supplemented here.

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## 7. DENMEAD NEIGHBOURHOOD PLAN REVIEW AND ITS RELATIONSHIP WITH THE LOCAL PLAN

In this section, we have analysed the soundness of the Neighbourhood Plan Review, in relation to the Local Plan. It is acknowledged that the Denmead Neighbourhood Plan Review will go through its examination process, but a number of matters are highlighted in these representations as it appears that Denmead Parish Council is not accepting representations on their latest consultation draft from non-residents. In addition, there are a number of matters of soundness in relation to the Local Plan.

### **Housing Distribution and Relationship to Policy H3**

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Denmead's emerging Neighbourhood Plan (2024) is currently in consultation. The local Plan identifies 328 dwellings to be delivered this way as below:

- Net completions (2020–2023): 117 units
- Outstanding permissions (as of 2023): 33 units
- Remaining allocations from the Denmead Neighbourhood Plan: 28 units
- Windfall allowance: 50 units
- New sites to be allocated in the Denmead Neighbourhood Plan Review (Policy D1): 100 units

This amounts to 2.1% of the 15,000 new homes in the Local Plan. We consider this figure to be insufficient given that Denmead is one of the most sustainable settlements in the District. As highlighted earlier sections, it is the fourth most sustainable location, after Winchester and the two settlements at West of Waterlooville and North Whiteley.

The Winchester District Strategic Housing Market Assessment (2020) notes that as the population of Denmead would increase by approximately 26% with a 31% increase in households over the period of 2016-2036, an increase in dwellings of around 980 in total is suggested. Therefore, the approach of allocating only 100 additional units to Denmead within the Local Plan is an underestimate of the area's future housing needs and should be increased in order for the Local Plan to be declared sound.

It is noted that AECOM have produced a Housing Needs Assessment (HNA) for Denmead. This document only applies the Local Plan requirement to the Neighbourhood Plan Area and then seeks to understand how levels of affordable housing, tenure and mix should be delivered within this overall

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target. As such, there is no evidence to contradict the Council's own figure of 950 dwellings over the plan period.

As a final point, should Winchester's Local Plan need to be examined under the new NPPF and the higher SM figure is applied, this would also require an increase to the Denmead housing distribution.

### **Site selection**

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The site selection process for Denmead's emerging Neighbourhood Plan involved The Steering Group responding to Winchester City Council's (WCC) 'Call for Sites' in 2019 to propose additional sites which were eventually proposed in Denmead Parish Council's (DPC) own 'Call for Sites' in 2023. Additionally, DPC secured government grant funding for AECOM to conduct both a 'Housing Needs Assessment' and an independent site assessment. These assessments, together with the WCC Site Assessment Document, were used to assign weightings for evaluating each potential site.

We note that the Parish Council has in turn decided not to allocate any sites south of Forest Road, due to potential landscape constraints in this location. This is not supported by any evidence alongside the Neighbourhood Plan. Furthermore, the Landscape Assessment submitted with these representations concludes that the site can be delivered with limited landscape impact.

### **Land at Forest Road and Furzeley Road**

Winchester City Council's Strategic Housing and Employment land availability assessment (2023) deems the Land at Forest Road and Furzeley Road site as deliverable reflecting that is considered acceptable for development. Similarly, Denmead's Neighbourhood Plan site options and assessment report undertaken by AECOM highlights that the site has been deemed as suitable for development subject to mitigation of constraints. They note that the site is well-connected to the built-up area which has good accessibility to local services and facilities, with potential for vehicle access and pedestrian links. Furthermore, the site has been selected as one of the 19 suitable sites within the neighbourhood plan reflecting its potential. However, they also set out that landscape, ecology, and access considerations mean that only the northern part of the site is seen as particularly suitable for development, therefore, the indicative number of homes within the site should be reduced to 65 from 100. We do not consider that this is a defensible conclusion for the site.

The landscape statement produced by James Blake Associates submitted alongside this pack shows that the southern part of the Site can be developed with limited mitigation. The ecology report notes that the site does not have ecological constraints that would necessitate the whole of the site being developed. It may be that AECOM are referencing the previous SINC designation for this part of the site, which has been removed as it has been demonstrated that the biodiversity value of this part of the site is limited.

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We also note Denmead Parish Council (DPC) have decided that they are not utilising the AECOM capacity figures. This is because they do not find them appropriate and consider they can be exceeded.

**Soundness Summary**

Policy H3 is unsound as it is not justified or appropriate. To remedy the housing requirement for Denmead Neighbourhood Plan Review should be increased to closer to the 950 homes first envisaged by the evidence base. This could occur as part of a wider increase in the housing target for the District, as highlighted in subsequent sections.



## 8. PROPOSED SITE ALLOCATIONS

Iceni has reviewed the Council's choice of allocations and has concluded that the following sites are flawed and amendments should be made to ensure the Local Plan is sound.

Allocated Site and settlement hierarchy	Allocated Proposed Units	Constraints identified	Recommendations
<b>Sir John Moore Barracks, Winchester/Littleton</b>	750 – 1000 units	The site is located between Littleton and Winchester and although there is some built form on the site already, development of the site would lead to coalescence between the two settlement. The deliverability and timescales of the site and its ability to deliver affordable housing at 40% are also not properly tested as highlighted in earlier sections of this document.	The development capacity of this site should be significantly reduced and focused on adjoining Winchester only and retaining proper separation between the two settlements.
<b>Land adjoining Cart &amp; Horses PH Kings Worthy, mid-tier settlement</b>	40 units	Prominent location within an open landscape with multiple designations, including moderate landscape sensitivity; concerns include its visibility from surrounding areas, being a TPO area, part of the green ribbon along the A33 within the settlement gap, valued for its rural character, important for farmland birds, adjacent to the Grade II listed Coach and Horses public house, and within the River Itchen SSSI Impact Risk Zone.	Development should be limited within this area as the site has multiple important environmental and landscape designations in terms of landscape and heritage.
<b>Land at Brightland,</b>	30 units	Landscape sensitivity due to its proximity to open countryside.	Development should be permitted on this Site as the visual and

<p><b>Sutton Scotney (WO10)</b></p> <p><b>Settlement Hierarchy:</b>  <b>Sutton Scotney, mid-to-lower tier, lower than Denmead.</b></p>		<p>Visual and biodiversity issues, including potential impacts on nearby trees.</p>	<p>biodiversity impacts can be mitigated.</p>
<p><b>Land adjoining 85 Church Lane, Colden Common</b></p>	<p>25 units</p>	<p>Visual sensitivity due to proximity to residential areas and heritage sites. Access concerns due to narrow roadways.</p>	<p>Narrow access points will need to be addressed before this site can be deemed acceptable.</p>
<p><b>Clayfield Park, Colden Common</b></p> <p><b>Colden Common, lower than Denmead.</b></p>	<p>50 units</p>	<p>Biodiversity concerns due to hedgerows and trees. Landscape sensitivity is moderate, and there are access issues with narrow local roads.</p>	<p>The site is in moderate landscape sensitivity location and thus other less sensitive sites should be prioritised.</p>

### Soundness summary

The above allocations should be reviewed and our recommendations accepted to ensure the Local Plan is effective and consistent with national policy.

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## 9. CONCLUSION

In conclusion, the land at Forest Road and Furzeley Road, Denmead, offers an excellent opportunity to deliver much-needed housing in a sustainable location, with minimal constraints and clear benefits to the local community. This site should be included within Winchester's Local Plan to help address both local housing needs and unmet needs from neighbouring authorities. However, the Local Plan as currently drafted has several deficiencies that must be addressed to make it sound.

Key points from this representation include:

- **Housing Need:** The Local Plan underestimates the scale of housing need, particularly in light of the significant unmet needs from neighbouring authorities such as Portsmouth and Havant. The current buffer of 1,450 homes is insufficient given the scale of these shortfalls.
- **Affordable Housing:** With 1,544 households on the housing register and a house price-to-income ratio of 13.19, there is an acute need for affordable housing in Winchester. The Plan's 40% affordable housing target is inadequate and unlikely to be met without a stronger, more flexible housing strategy.
- **Reliance on Large Sites:** The Plan places too much emphasis on large strategic sites, which carry inherent risks of delays and infrastructure challenges. Smaller, more deliverable sites like Forest Road and Furzeley Road should be prioritised to diversify the housing supply and ensure a steadier rate of delivery.
- **Duty to Cooperate:** The Local Plan does not adequately address the Duty to Cooperate, particularly in relation to unmet housing needs from neighbouring areas. A more collaborative and responsive approach is required to meet Winchester's legal obligations under national policy.
- **Site Suitability:** The land at Forest Road and Furzeley Road is ideally suited for development, offering 100 units (including 40 affordable homes), new allotments, and enhanced biodiversity through a 10% biodiversity net gain. Its development would support the district's housing and environmental goals in a sustainable and well-connected location.

To make the Local Plan sound, we recommend the following actions:

- **Increase the housing requirement:** To more accurately reflect local and regional housing needs, particularly those of neighbouring authorities.

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- Allocate smaller, deliverable sites: Sites like Forest Road and Furzeley Road should be allocated to provide a more flexible and resilient housing strategy.
  - Strengthen the response to unmet need: Ensure Winchester contributes more meaningfully to the unmet housing needs in neighbouring authorities, improving cooperation and ensuring legal compliance.

By adopting these changes, the Local Plan can provide a more effective, sustainable, and compliant approach to meeting housing demand across Winchester and its neighbouring areas. While the Plan is currently unsound, these modifications would ensure that it meets the necessary tests of soundness and better serves the housing needs of the district.

# A1. SITE LOCATION



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## **A2. MASTERPLAN**

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### **A3. LANDSCAPE ASSESSMENT**

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## **A4. ECOLOGY ASSESSMENT**