



Winchester Local Plan Examination: Response to Matter 5

Land at Titchfield Lane, Wickham

Boyer

Prepared on behalf of Catesby Estates plc | March 25

REPORT CONTROL

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1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Boyer on behalf of Catesby Estates plc ('Catesby'), in response to the Inspector's Stage 1 Matters, Issues and Questions ('MIQs') in relation to the examination of the Winchester District Local Plan 2020-2040 ('Local Plan').
- 1.2 Boyer has prepared this statement in response to Matter 5: Site allocation methodology.
- 1.3 The Hearing Statement has been prepared with respect to the promotion of Land at Titchfield Lane, Wickham (WI19), over which Catesby holds a specific land interest. Our comments respond only to those questions pertinent to our client's interest.
- 1.4 Boyer submitted representations to the Council's Regulation 19 Consultation on behalf of Catesby.

2. RESPONSE TO MATTER 5

Issue: 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

- 2.1 It is noted that the Inspector has specifically requested that Winchester City Council (WCC) provide a response to questions 1 to 4 in relation to the proposed allocations. Nonetheless, Catesby also wishes to respond briefly as follows.
- 1. How have the proposed allocations been identified?**
- 2.2 A document titled 'Development Strategy and Site Selection' (SD10b) forms part of the evidence base for the Local Plan. This document sets out the stages of site allocation, which started with a consideration of the existing site allocations that have not yet come forward. WCC then considered the sites within the SHELAA 2021 to consider new allocations, with each site considered within the Integrated Impact Assessment.
- 2.3 The Integrated Impact Assessment (IIA, SD02a) assesses the site against several criteria. However, these assessments are undertaken using a 'policy-off' vs 'policy-on' approach. In this respect, sites proposed for allocation are evaluated based on potential mitigation measures (i.e., 'policy-on'), improving their scoring. This is explained in paragraphs 5.282 to 5.288 of the Main IIA Report.
- 2.4 However, the potential for mitigation is discounted where omission sites are considered. This is apparent from the assessments undertaken in Appendix F of the IIA and the explanation commencing in paragraph 4.269 of the Main IIA Report (SD02a). Indeed, this paragraph confirms that details provided by developers/site promoters (such as technical reports, emerging masterplans, and Vision Documents) were not considered when evaluating omission sites.
- 2.5 Similarly, Appendix 3 to the 'Development Strategy and Site Selection' includes full appraisals of the draft allocated sites but no detailed assessment of omission sites. There is no like-for-like comparison between allocated sites and omission sites, and (consequently) there can be no certainty that the proposed suite of allocations represents the most sustainable of the available options.
- 2.6 For example, the evaluation of Land at Titchfield Lane (WI19) in respect of IIA Objectives 1 (Climate Change Mitigation) and 2 (Transport and Air Quality) results in the awarding of two 'minor negative' scores. However, if the assessment took account of information provided by Catesby (i.e., to arrive at a 'policy on' conclusion) then opportunities to improve footpath and cycle connections would have been considered, thereby allowing for a more informed evaluation and improved scoring.
- 2.7 The shortcoming of this methodological approach is even more relevant in the context of

concerns regarding the Council's failure to test reasonable alternatives to provide for a significantly higher level of overall housing growth than envisaged in the submitted Local Plan (through the IIA or elsewhere), as set out in our Statement for Matter 1.

- 2.8 In the expectation that the Plan will need to be modified to include a significant number of additional housing allocations (for the reasons outlined in this Statement, and those for Matters 1, 2, 3 & 4), Catesby recommends that all promoted sites, other than those plainly unsuitable owing to hard constraints, should be reassessed taking account of policy-on assumptions where the promoter/developer in question has provided relevant information, as Catesby has done in respect of Land at Titchfield Lane, Wickham.

2. 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?

- 2.9 The Policies mentioned in this question relate to the spatial strategy (Policies SP1, SP2 and SP3) and the approach to housing provision, supply and distribution (Policies H1, H2 and H3). Policies E1, E2 and E3 concern the provision and protection of employment land.
- 2.10 Catesby's interest concerns the spatial strategy, particularly the provision, supply, and distribution of homes. In this respect, the Council sets out its position in the Plan, the Updated Housing Topic Paper (ED02), and elsewhere, which is that the site allocations (including recycled existing provision and new allocations) are sufficient to meet the identified housing requirement.
- 2.11 However, as discussed in our Statements for Matters 2, 3 and 4, Catesby has significant concerns relating to the commencement of the Plan period in 2020 (and relatedly, the counting of existing completions towards the identified supply), in addition to concerns regarding assumed windfall contributions and the reliance on existing commitments coupled with a lack of new allocations. This results in a trajectory that will not be effective at sustaining a rolling 5-year housing land supply (5YHLS) or meeting the identified Plan-period requirement.
- 2.12 It appears to Catesby that the essence of this Plan is to do the bare minimum by carrying forward previously delayed housing completions from existing strategic allocations that have failed to deliver in a timely manner, alongside other commitments that are not actually reliant on this Plan being found sound. Without extensively repeating the content of our Matter 4 Statement, the Plan's approach leads to corresponding problems in the housing trajectory, which the Council seeks to address through an artificial 'brownfield first approach' and associated phasing of supply, ignoring at the same time to challenges often associated with redeveloping brownfield land.

- 2.13 Fundamentally, this Plan proposes just 2,875 homes through new allocations, equivalent to 19% of the overall housing requirement identified (15,115 homes). Moreover, 900 of these homes relate to Sir John Moore Barracks, a brownfield site that could be redeveloped irrespective of the proposed new allocation set out in this Plan. Overall, it is no exaggeration to say that this Plan does very little to boost the supply of housing.
- 2.14 To address this, the Plan should allocate additional sites across the settlement hierarchy to significantly boost the supply of housing throughout the Plan period. Wickham is recognised as a particularly sustainable settlement within the 'Market Towns and Rural Area' category, as set out in the Settlement Hierarchy Review (August 2024). The settlement scores highly in this Review, on an equivalent basis to New Alresford and Bishop's Waltham and is recognised as the 5th most sustainable settlement (of a total of 50 settlements identified).

3. 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?

- 2.15 Appendix 3 of the 'Development Strategy and Site Selection' document contains an assessment of each of the proposed allocations. This focuses on whether there are constraints, such as relating to landscape and heritage, which merit consideration as matters of principle.
- 2.16 However, there is no direct discussion concerning site boundaries or assumed capacity. It is, therefore, unclear whether a site's development capacity (as identified in the Local Plan) is based on the Council's assumptions or those agreed by the landowner/promoter/developer interest. As indicated, there is a conspicuous absence of Statements of Common Grounds concluded between WCC and developer parties.
- 2.17 Catesby accepts there will always be a degree of uncertainty regarding site capacity until this is tested through a planning application. Nonetheless, assumptions concerning site capacity could (cumulatively) have significant implications for the Plan's capacity to address the identified housing requirement and sustain a rolling 5YHLS. In some instances, there is substantial ambiguity about the capacity of proposed allocations.
- 2.18 The proposed allocation of Sir John Moore Barracks for 750 to 1,000 homes amplified this point. This represents a considerable 'range' for one site, which risks a shortfall arising. In turn, this highlights the importance of having a strong evidential basis for each proposed allocation or assumed source of supply. In Catesby's view, the paucity of evidence increases the degree of risk associated with this Local Plan and the consequential need for much greater flexibility to be embedded within it, as detailed below.

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

- 2.19 Table H2 of the Local Plan sets out the supply for 15,465 homes across the Plan Period. Of this, only 2,875 homes would come from new allocations. The balance relies on completions,

commitments, and sites benefiting from planning permission but not yet built out, in addition to carried forward existing allocations and an assumed windfall contribution. This equates to the provision of 15,465 homes against a requirement of 15,465 homes, which means there is no scope for any deviation.

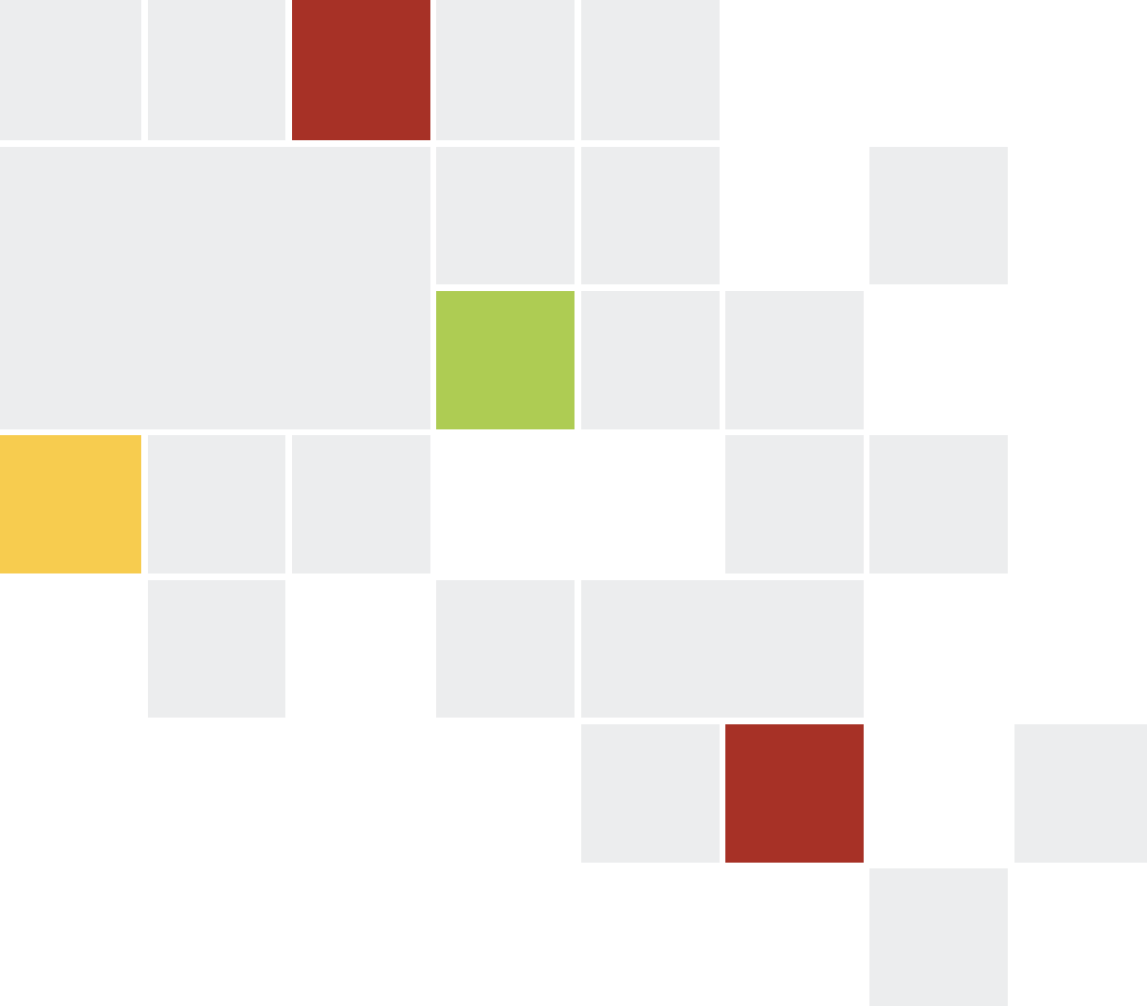
- 2.20 Invariably, some sites will fail to come forward or do so more slowly than anticipated, and windfall rates could be lower. Despite this obvious risk, the Housing Topic Papers (2024 and 2025) reject the proposition of a 'buffer' in favour of a phased trajectory and restrictive brownfield first approach, which (we believe erroneously) is said to secure a consistent housing supply across the Plan period.
- 2.21 At its heart, the trajectory for the Plan and the associated sources of supply are plagued by uncertainty. This is because the Council has sought to avoid the allocation of sufficient new greenfield sites, and the Plan is likely to be ineffective as a result. Adding a buffer to the identified housing requirement is the least that should be done to help mitigate the uncertainties identified. This new Local Plan should not repeat the shortcomings of the 2013 Joint Core Strategy or the 2017 Local Plan Part 2, which have been characterised by delayed delivery.
- 2.22 Therefore, to ensure robustness and demonstrate an *effective* supply, the Plan should include a buffer of at least 5% to account for risks concerning windfall provision, overestimation of site development capacity, and potential delayed delivery generally. Including a buffer would be appropriate, given the contribution of challenging brownfield sites within the claimed trajectory.
- 2.23 Notwithstanding our comments on the soundness of the Plan's housing requirement, the addition of a moderate 5% buffer (to provide flexibility) would add 773 homes to the identified requirement, equating to 15,465 homes overall. As detailed above, Wickham is recognised as a particularly sustainable settlement within the 'Market Towns and Rural Area', and Land at Titchfield Lane (WI19) is a suitable site for delivering new homes, which is unburdened by the uncertainties affecting other parts of the identified trajectory. It should be allocated for development alongside a suite of other deliverable sites.

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

- 2.24 Catesby agrees that evidence of delivery should be provided for each proposed allocation. Although the Updated Housing Topic Paper (ED02) now includes a detailed trajectory, there is a notable absence of Statements of Common Ground concluded between the respective developer/promoter and the Council. It is, therefore, unclear on what evidential basis the identified detailed trajectory is justified.

6. 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.

- 2.25 Catesby agrees that evidence should be provided against the assumed figures for completions, outstanding permissions, windfall allowance, Neighbourhood Plan allocations, extant Plan existing commitments, and new site allocations. Catesby has a number of concerns about the supply assumptions presented by the Council in the Updated Housing Topic Paper (ED02), as detailed in our Statement for Matter 4, which we do not repeat here.



Crowthorne House, Nine Mile Ride, Wokingham, RG40 3GZ | 01344 753 220
wokingham@boyerplanning.co.uk | boyerplanning.co.uk

Boyer