



Winchester Local Plan Examination: Response to Matter 1

Land at Titchfield Lane, Wickham

Boyer

Prepared on behalf of Cateby Estates plc | March 25

REPORT CONTROL

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1. INTRODUCTION

- 1.1 Boyer has prepared this Hearing Statement on behalf of Catesby Estates plc ('Catesby') in response to the Inspector's Stage 1 Matters, Issues, and Questions ('MIQs'). This is in relation to the examination of the Winchester District Local Plan 2020-2040 ('Local Plan'/ 'the Plan')
- 1.2 Boyer has prepared this statement in response to Matter 1: 'Legal and Procedural Requirements', as identified in Examination Document ED13 – Matters Issues and Questions – Stage 1.
- 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 1

Issue 1: Whether all Statutory and Regulatory requirements have been met?

Duty to Cooperate

Is there clear evidence that the Council has engaged constructively, actively and on an ongoing basis with neighbouring authorities and prescribed bodies in accordance with section 33A of the 2004 Act, in respect of strategic matters with cross-boundary impacts considered through the preparation of the Plan?

In particular in relation to the unmet housing need in Partnership of South Hampshire area (PfSH) and individual adjoining Councils, especially Portsmouth and Havant and Basingstoke in relation to the establishment of a new community at the Popham Airfield and Micheldever Station?

- 2.1 Catesby does not consider that matters relating to unmet housing needs have been adequately addressed through the Duty to Cooperate (DTC). Without repeating the more detailed commentary in our Matter 4 Statement, in summary, the Plan does not attempt to engage with the true scale of unmet needs within the Partnership for South Hampshire (PfSH) area. The 2023 Position Statement (PSH01) identified an unmet need of approximately 11,000 homes, and clearly, this figure rises by orders of magnitude in the context of the revised Standard Method and December 2024 NPPF.
- 2.2 There is nothing in the DTC Statement (SD06) or the associated Statements of Common Ground (SoCG) concluded with Havant or Portsmouth to suggest that Winchester has ever made any serious attempt to establish whether it could accommodate, more fully, the extent of unmet needs arising in these Authorities. Indeed, as set out in our Matter 4 Statement, the arrival at the proposed 1,900 home figure appears arbitrary and taken 'as gospel' following the signing of the PfSH Position Statement in December 2023.
- 2.3 It is far from clear that the cooperation between Winchester and neighbouring Authorities (in so far as housing needs are concerned) has maximised the effectiveness of this Plan, as required by the Planning and Compulsory Purchase Act at Section 33a.

Sustainability Appraisal

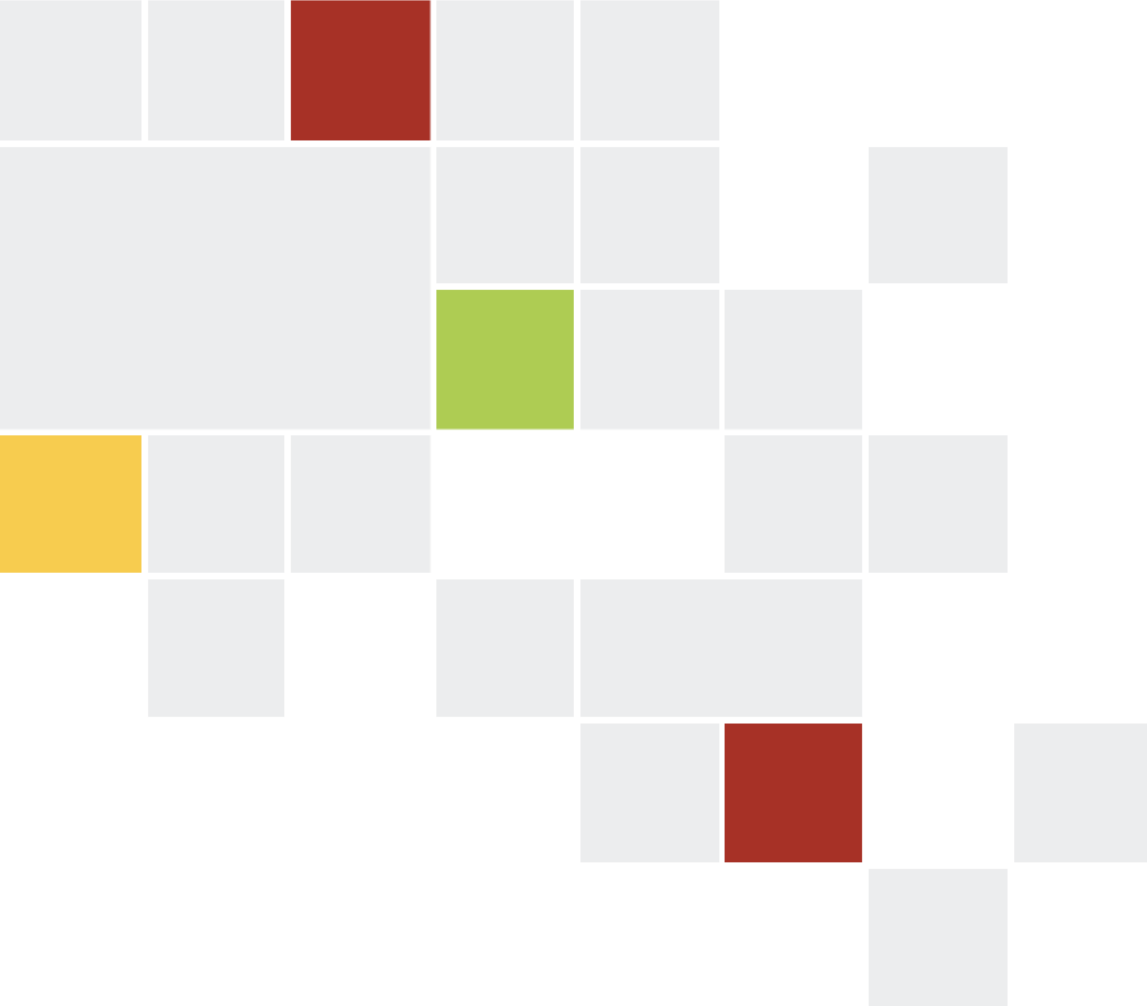
The SA tested five spatial strategy options: a development strategy based on the adopted Local Plan, focusing development on Winchester and the larger more sustainable settlements; a strategy based on a new strategic allocation/new settlement; a strategy based on dispersing development around the District largely in proportion to the size of existing settlements; and, a variation of option 1, known as option 1A, which provides for a higher total number of dwellings. It takes account of existing commitments, windfall allowance and has the effect of reducing development in the South Hampshire Urban Area and increasing it in Winchester and the Market Towns and Rural Areas. Given national policy that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas should an option with a

higher growth target have been considered?

- 2.4 Yes, Catesby considers that an option to provide for a significantly higher level of housing growth should have been evaluated. The Integrated Impact Assessment (IIA) sets out that five options were tested. Four of the options treated a figure of 14,000 homes over the Plan period as a 'constant'. Only one option (Option 1A) tested a higher figure, 15,620 homes.
- 2.5 It is concerning that the Council did not test options for a significantly higher level of overall housing growth (above that tested in Option 1A), given the level of unmet need known to be arising in the PfSH area. Indeed, the IIA Main Report, pages 588 to 595, suggests that in identifying 'capacity' for the tested scenarios, WCC simply relied upon shortlisted HELAA sites alongside Parish Council preferences and responses to earlier Regulation 18 consultations.
- 2.6 By taking this approach and failing to consider scenarios for a much higher level of housing delivery, the IIA (and, therefore, the Plan itself) cannot be said to be effective and based on an appropriate evaluation of reasonable alternatives. This is particularly relevant, as this Plan makes minimal provision for new housing allocations overall (as further explored in our Statements for Matters 2, 3, 4 and 5).

In overall terms does the Plan meet the legal requirements of Section 19(5) of the 2004 Act and accord with National Planning Policy Framework (NPPF) paragraph 32 and the Planning Practice Guidance (PPG) in this regard?

- 2.7 Catesby does not consider that the Plan has fully considered reasonable alternatives, notably exploring whether significantly increased growth scenarios may be more appropriate, taking account of available evidence and the prevalence of unmet needs.



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