



# Winchester Local Plan Examination: Response to Matter 2

Land at Titchfield Lane, Wickham

**Boyer**

Prepared on behalf of Cateby Estates plc | March 25

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**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'/'the Plan')
- 1.2 Boyer has prepared this statement in response to Matter 2: 'Spatial strategy and distribution of development Policies SP1, SP2, SP3, H1, H2, H3, and E1 and E2', 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 Representations were submitted, by Boyer, to the Council's Regulation 19 Consultation on behalf of Catesby.

## 2. RESPONSE TO MATTER 2

### **Issue 1: Issue: Whether the spatial strategy and distribution of development is positively prepared, justified, effective and consistent with national policy.**

**The Settlement Hierarchy Review (2024) scores settlements and groups them which provides the settlement hierarchy in the District. Is the methodology used robust and the outcomes accurate? Is the distribution of development between the tiers of settlements justified and how has it been established?**

- 2.1 Catesby has no comment on the Settlement Hierarchy Review and agrees that levels of planned housing growth should indeed also scale across the hierarchy. However, the Plan fundamentally fails to provide sufficient new housing allocations overall. It does not, therefore, reflect the opportunities to achieve sustainable patterns of development across the settlement hierarchy as a whole.
- 2.2 As detailed below, additional allocations are needed, and this includes within the 'Market Towns and Rural Area' and at Wickham as 'Large Rural Settlement', which is a notably sustainable settlement within the Plan area.

**Is the spatial strategy and settlement hierarchy as set out in Strategic policy SP2 justified as an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence?**

- 2.3 No, Catesby does not support the strategy presented in Draft Policy SP2. Firstly, (as detailed in our Statement for Matter 4) the sources of housing supply currently identified in the Plan will not meet the identified housing requirement. Nor does the spatial strategy promote levels of delivery to address the significantly uplifted LHN that applies under the December 2024 NPPF, which will define the housing requirement that the Council will need to address through an immediate review of the Plan.
- 2.4 The Council will then have to allocate new strategic allocations/strategic growth areas to meet the dramatically higher housing targets arising. However, new strategic sites will invariably take a long time to come forward. They must then be balanced through the allocation of an extensive suite of small/medium-sized sites, which can be brought forward more easily as self-contained developments, thereby offering a consistent supply throughout the Plan period.
- 2.5 Put more simply, the Council should not repeat the shortcomings of LPP1, where delayed completions from strategic sites were not offset by supply from small and medium-sized sites. This requires additional allocations within the 'Market Towns and Rural Area' category. This is essential to start future-proofing the Plan in anticipation of the fundamental change in the level of housing that will need to be provided.
- 2.6 Many sites are available for development around Wickham (as identified in the SHELLA, 2024), which is recognised as a sustainable 'Larger Rural Settlement' in the proposed settlement hierarchy. Of the promoted sites, Land at Titchfield Lane (site ref WI19) has long

been identified as a strong candidate for allocation at this settlement, with the Parish Council regarding it as the 'runner-up' site during the preparation of Local Plan Part 2 (LPP2). However, as we note below, WCC has seemingly sought to exclude it from full consideration despite it having been consistently promoted and despite it being already established as a potential location for future housing development in the eyes of the Parish Council.

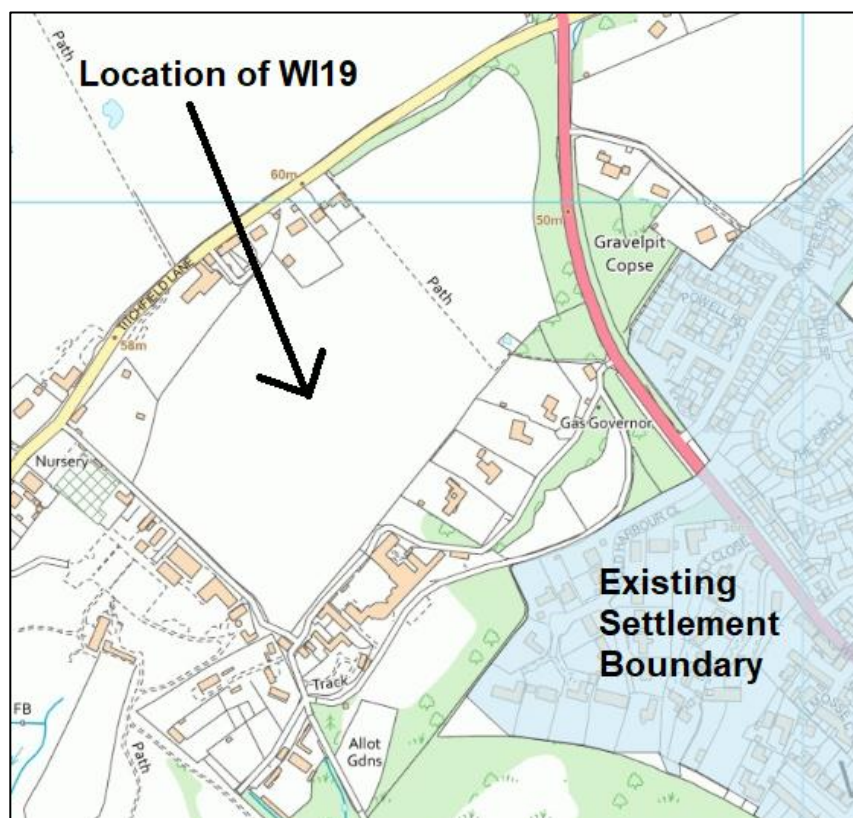
- 2.7 Accordingly, Policy S2 is not justified in the context of the above. It should be modified to apportion additional homes to Wickham, as a sustainable Larger Rural Settlement, as part of wider revisions to the Plan which are needed to address an overall increase in the identified housing requirement.

**Is the proposed distribution of housing and other development supported by the evidence in the SHELAA, settlement hierarchy, and IIA, and will it lead to an appropriate pattern of housing and economic growth?**

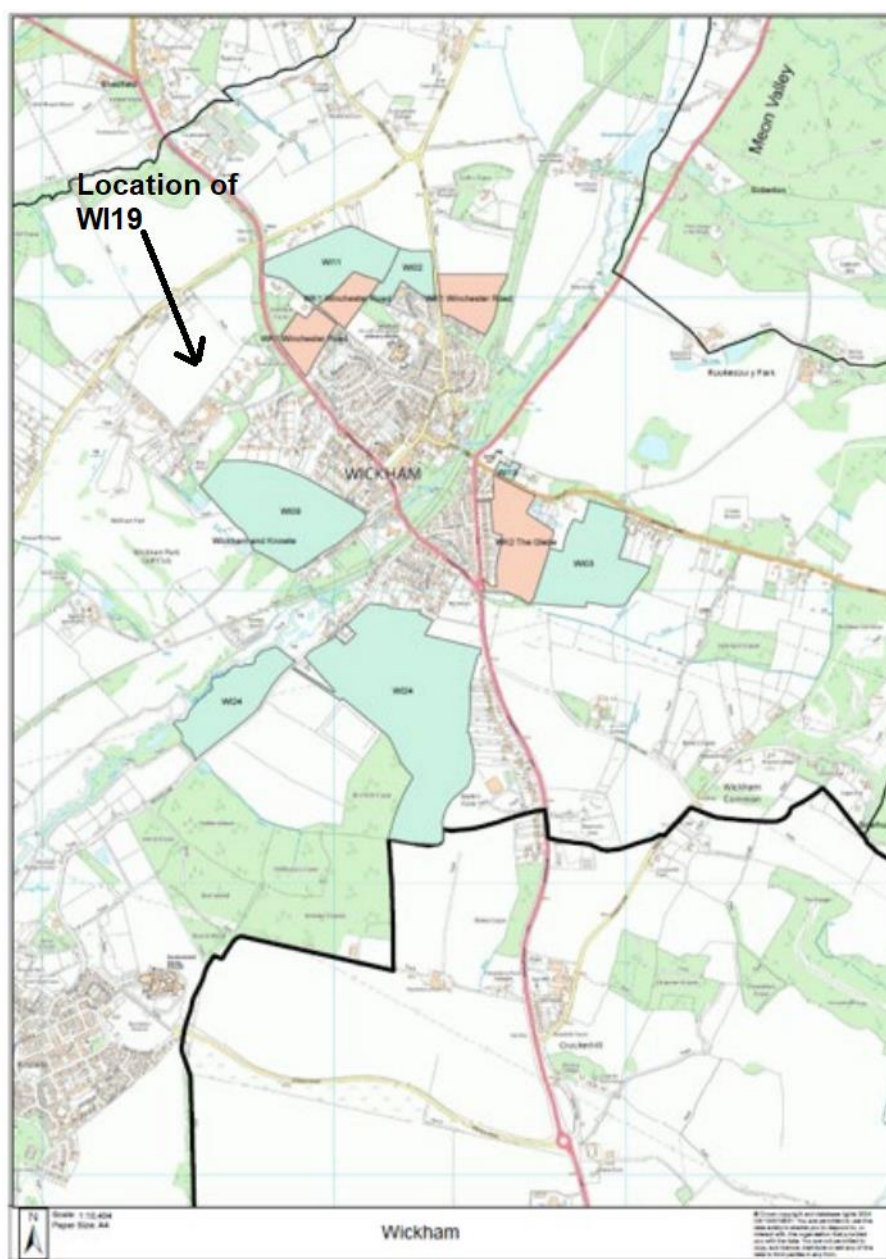
- 2.8 No, the Plan should allocate additional sites across the settlement hierarchy, including within the 'Market Towns and Rural Area' category. This will bolster supply throughout the Plan period, including addressing the requirements of the December 2024 NPPF and the uplifted LHN, which will apply when the Plan (if ultimately adopted) is reviewed.
- 2.9 The Settlement Hierarchy Review (August 2024) recognises Wickham as a particularly sustainable settlement (awarding a daily facilities score of 18, the same score awarded to New Alresford and Bishop's Waltham). Then, in the total scoring presented on page 19 of the Settlement Hierarchy Review, Wickham is identified as the 5<sup>th</sup> most sustainable settlement (of a total of 50 settlements listed). This indicates that it is a sustainable location for further growth.
- 2.10 The SHELAA also identifies a range of available sites at Wickham, indicating strong developer interest. Based on the promoted sites, it cites a 'theoretical residential capacity' of 2,503 homes in Table 10 (pages 20 to 21).

**Have settlement boundaries been defined in accordance with a clear and easily understood methodology that is consistently applied?**

- 2.11 Catesby has fundamental concerns regarding the approach taken regarding Wickham. Specifically, WCC (including during their recent engagement with Wickham Parish Council) has entirely discounted consideration of Catesby's site (WI19). It is not altogether clear why this is the case. However, the inference on pages 4 to 5 of the 'Wickham Site Selection Background Paper November 2024' (SD10KJ) is that the site may have been excluded because it does not directly adjoin the existing settlement boundary.
- 2.12 This is problematic because the current Wickham settlement boundary does not extend to include all of the existing built-up area at the settlement, particularly to the northwest, towards Catesby's site (as illustrated below). WCC undertook a settlement boundary review in 2014 in support of LPP2. However, no further review has been undertaken to support the preparation of the new Local Plan. This is a significant omission, given the context of current national policy and the emphasis on facilitating increased housing delivery.



- 2.13 This, in turn, meant that WCC did not invite the Parish Council to offer their views on W119 despite this site being suitably connected to the village. Therefore, excluding site W119 from the shortlist of preferred sites at Wickham appears arbitrary. This is concerning when it is noted that the site performs comparably to the alternatives that were shortlisted.
- 2.14 WCC's approach is particularly troublesome, noting that Wickham Parish Council had previously identified (in their engagement with WCC regarding LPP2) site W119 as their 'runner-up option' for prospective allocation, with the site being presented (by WCC) as one of the main credible options for the Parish Council to consider. Yet the extract overleaf (lifted from the Wickham Site-Selection Background Paper) suggests that WCC did not even acknowledge the site's continued availability in their engagement with the Parish Council in preparing the Local Plan, now subject to Examination.
- 2.15 Given that WCC's approach to site selection gives great weight to the preferences of Parish Councils, it is perplexing that Wickham Parish Council were told (by WCC's Planning Policy Officers) that they could not consider a site they had previously viewed positively.



- 2.16 The broader point is that whilst adjacency to a settlement boundary may be a proxy for assessing a site's sustainability, it is not the final word. Moreover, WCC's approach appears to have reduced the number of sites identified as potentially suitable for allocation. WCC does not have this luxury, noting the level of housing needs to be addressed now through this Local Plan and in the anticipated immediate review that will be necessary, assuming it is capable of being found sound.
- 2.17 The omission of a general settlement boundary review also stands at odds with the approach taken at South Wonston (an Intermediate Rural Settlement), where the settlement boundary is being adjusted to encompass existing dwellings. WCC has not identified a methodology to support this, so it is unclear why settlement boundaries should be adjusted at this settlement (presumably to reflect the existing pattern of built form) but not at others.



**Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?**

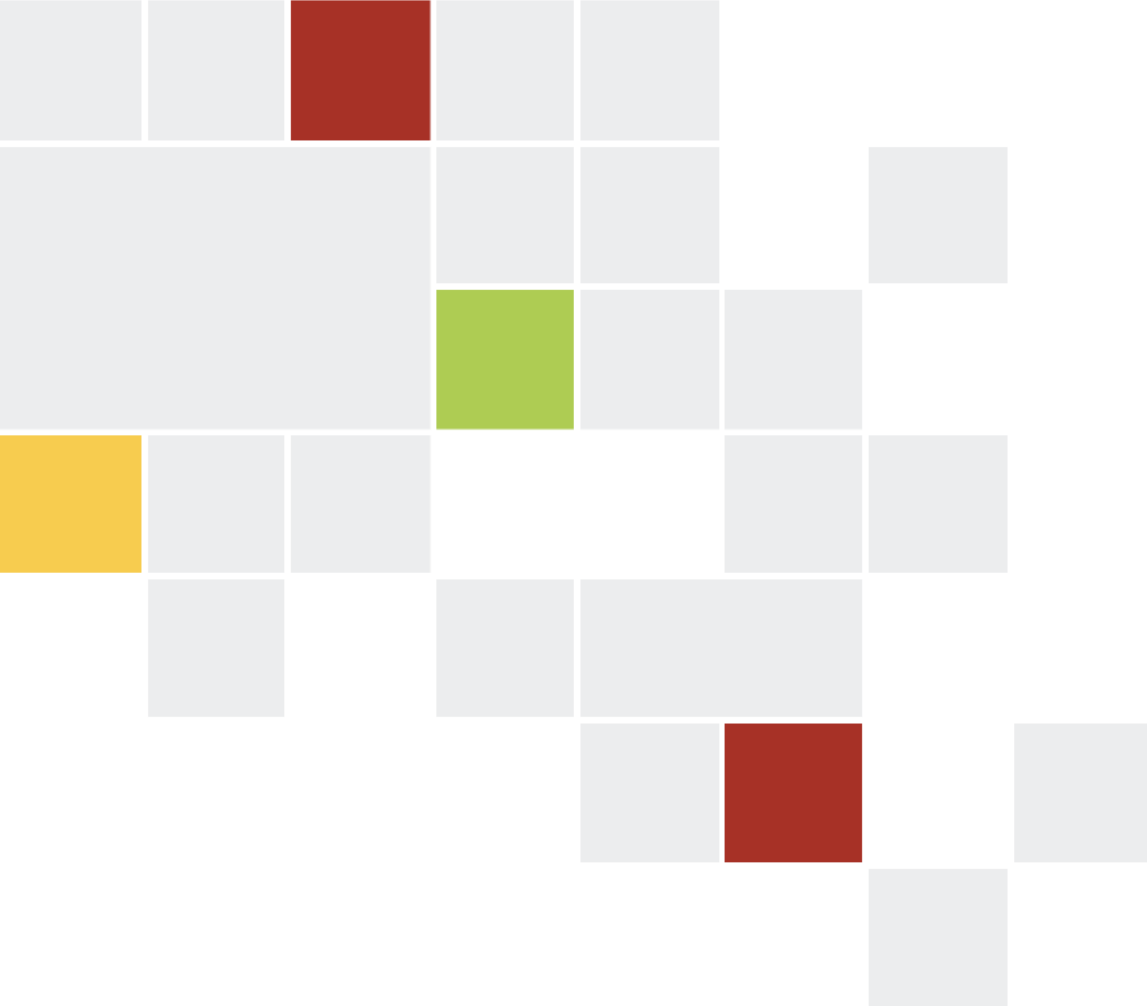
- 2.18 The Plan does not propose a significant number of *new* homes that were not already planned for through existing allocations or otherwise derived from existing commitments or projected windfall. Table H2 of the Plan (page 216) identifies that the new allocations (i.e., newly proposed in the Plan and not already benefiting from planning permission) will provide 2,875 homes. This represents approximately 19% of the proposed housing requirement (15,115 homes).
- 2.19 Indeed, this Plan does so little to boost the supply of new homes that, ironically, its failure at Examination might (via the corresponding application of NPPF paragraph 11d and the tilted balance to decision-taking) have the effect of enabling the delivery of more than the 2,875 homes identified through new allocations. This is noting that existing commitments, current allocations, and windfall supply do not rely on the success of this Local Plan at Examination.
- 2.20 The SHLAA, at Table 10, indicates that land for some 62,359 homes was promoted through the 'call for sites' consultations. Whilst not all of these sites will be suitable for development, there is clearly scope for delivering far more homes than the Plan envisages. This is relevant when it is remembered that the LHN figure arising in connection with the December 2024 NPPF is markedly higher than the level of growth envisaged in this 'transitional arrangements' Local Plan.
- 2.21 Additional allocations are needed throughout the settlement hierarchy, particularly within the Market Town and Rural Area category, as presented in Policy H3. Wickham is a particularly sustainable settlement within this spatial category and can accommodate far more growth than presently envisaged.

**Would the Plan's spatial strategy strike the right balance between the need for development across brownfield and greenfield sites and any related impact on housing affordability?**

- 2.22 No, the spatial strategy relies too greatly on redeveloping brownfield sites, such as Sir John Moore Barracks (WC2), 900 homes, and the Central Winchester Regeneration Area (WC7), 300 homes. This is in addition to other sites, such as Clayfield Park (CC1), proposed for 48 homes.
- 2.23 Whilst the redevelopment of previously developed land (PDL) finds support in the NPPF, a restrictive brownfield first approach does not, noting that, as is well documented (in work by Litchfields' 'Start to Finish Report'), brownfield sites often take longer to deliver. This feeds into Catesby's wider concerns regarding recycling allocations/sources of supply from the 2013 Joint Core Strategy or the 2017 Local Plan Part 2.



- 2.24 Policy H6, in proposing an affordable housing tariff of between 25% and 40% for new housing developments, depending on a site's location and constraints, anticipates that previously developed sites will be less able to deliver affordable housing than greenfield sites. Restricting the supply of greenfield development land via insufficient allocations or artificially constraining supply will undermine the provision of much-needed affordable housing.
- 2.25 The interrelationship with the envisaged 'brownfield first' approach (as further addressed in our Matter 4 Statement) also has to be considered, as the Council are effectively contending that for the first half of the Plan period (i.e. when PDL sites are to come forward, rather than greenfield allocations), only 30% of new dwellings will be affordable. This assumes that brownfield sites can deliver a policy-compliant level of affordable housing. Many PDL sites are, in fact, unlikely to achieve this (as evidenced by the under-delivery of affordable housing during the Plan period of the adopted LPP1).



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