



EXAMINATION OF THE WINCHESTER DISTRICT LOCAL PLAN 2020-2040

MATTER 2: SPATIAL STRATEGY AND DISTRIBUTION OF DEVELOPMENT

On behalf of Wates Developments Ltd.

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1.0 INTRODUCTION

- 1.1 This statement is submitted on behalf of Wates Developments Ltd. ('Wates') in relation to the Examination in Public of Winchester City Council ('the Council') Local Plan 2020-2040 ('the Local Plan'). Carter Jonas LLP is instructed by Wates.
- 1.2 Wates is promoting the development of land on the northern edge of Winchester, ('the site' or 'Pudding Farm').
- 1.3 The site is identified in the Strategic Housing & Economic Land Availability Assessment (SHELAA) (December 2021) as site reference HW03. The SHELAA confirms that the site is 'deliverable' and 'developable' with no identified environmental, historical, constraints, and only limited physical constraints (this includes flood risk, which is disputed). Wates confirms that the site remains available for development. It is therefore considered wholly suitable for allocation through the Local Plan.
- 1.4 Wates has been supportive of the preparation and principal direction of the key elements of the plan. Wates supports the overall strategy and the aim to provide a stable policy context for developers to help deliver much needed housing across the Local Plan area in a sustainable manner.
- 1.5 Wates made representations in response to the consultations held on the informal (Regulation 18) Plan and the Publication Plan (Regulation 19) consultation on the Local Plan.
- 1.6 In this submission, Wates sets out its responses to Matter 2: Spatial strategy and distribution of development.
- 1.7 This statement should be read in combination with Wates' responses to the Inspector's others Matters.

Background

Wates Developments Ltd.

- 1.8 Wates is an expert in land, planning and residential development throughout England. The business focuses on securing land and delivering planning consents in sustainable locations, in areas of high demand.
- 1.9 As a family-owned business Wates shares a deep sense of responsibility to provide outstanding projects for customers which make a long-lasting difference to the communities in which it works.

Pudding Farm - Site Context

- 1.10 The site is located 2–2.5km to the north of Winchester city centre. The centre of Winchester offers a large and broad range of high-order services and facilities including retail, leisure, health and employment.
- 1.11 The Land at Pudding Farm extends to some 18.7 hectares in total and is split into four arable fields.
- 1.12 Barton Farm Cottages are located on Worthy Road, outside of the site boundary.
- 1.13 The site is bound by Abbott's Barton to the south, the St Swithun's Way to the east and the River Itchen to the north. Along the western boundary runs Worthy Road, beyond which lies the Kings Barton/Barton

Farm development comprising 2,000 homes. Barton Meadows Nature Reserve, created during the Kings Barton Housing Development, also sits to the west of the site.

- 1.14 Wates has undertaken technical assessment of the environmental and technical features of the site which confirm that there are no significant physical, environmental or technical constraints that would preclude the development of the site for residential use.

Pudding Farm - Site Vision and Development Benefits

- 1.15 A team of specialist consultants has been appointed by Wates to research and review available technical information relating to the site and its context in order to accurately and robustly develop a deliverable vision for the site.
- 1.16 Wates has developed three concept masterplans which demonstrate that the site can deliver up to 150-200 homes and/or a Care Homes Village. Based upon the identified opportunities and constraints, the development of the site has the potential to deliver:

Option 1: 150-200 new homes/care home village and the creation of a new country park

- 1.17 The mixture of parkland, natural and semi-natural areas seeks to maximise the Biodiversity benefits of the site and creates a sensitive interface with the countryside and safeguards against the potential for unchecked growth and coalescence with Headbourne Worthy.

Option 2: 150-200 new homes/care home village and the creation of a solar park

- 1.18 Solar farms are large-scale collections of photovoltaic panels. Capturing the sun's energy to generate electricity they feed into local and regional power grids. This will support to the Council to achieve the goal of carbon neutrality by 2030 and producing 550 megawatts of solar energy by 2030.

Option 3: 150-200 new homes/care home village and the creation of a new country park and solar park

- 1.19 This approach seeks to balance the environmental benefits of both the county park and solar park to address the key areas of both biodiversity and the natural environment and carbon neutrality.

2.0 ISSUE: WHETHER THE SPATIAL STRATEGY AND DISTRIBUTION OF DEVELOPMENT IS POSITIVELY PREPARED, JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY.

- 2.1 Wates is of the opinion that the spatial strategy is sound in principle, but the housing requirements, and their distribution are not fully justified and are therefore unsound.
- 2.2 There is greater capacity for development across the Local Plan area, and especially in Winchester at Pudding Farm.

1. 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?

- 2.3 Wates notes that the Settlement Hierarchy is based on the range of facilities that are available in a given location. Settlements with more facilities are generally identified as more sustainable and are therefore higher up the hierarchy. The Council has also identified facilities and services that are likely to be required on a daily basis, and those that are important, but generally used less often; 'daily services' are given an additional weighting in the final assessment of sustainability.
- 2.4 Wates is of the opinion that the general approach set out in the Settlement Hierarchy background paper (Document DS01) is sound, and that the Council has broadly identified those locations which are most sustainable for new development. The hierarchy does not, however, acknowledge that new development can bring with it new services and facilities, and as such could provide additional capacity and could elevate a settlement in the hierarchy. This is a matter that the Council will need to consider as it maintains and monitors its hierarchy, especially when it is notes that:

5.2 *...an important point regarding the production and use of assessments such as this. The scoring of settlements by the presence of services and facilities may be expected to change, as facilities close and open. It is also the case that the available capacity for some services (i.e. schools and health centres) will vary over time. Finally, not all facilities are of the same importance to all households.*

- 2.5 Overall, Wates agrees that:

...assessments such as these can evolve but are, nevertheless, a suitable method to help develop and inform the emerging development strategy.
- 2.6 Wates believes that the assessment of settlements is accurate and reflects the current level of services and facilities that are available in the plan area.
- 2.7 There are some references across the Local Plan evidence base that the quantum of development is based on needs, and infrastructure capacity. However, the housing needs are questioned in general (see Matter 4), and infrastructure capacity is not clearly explained or assessed on a consistent basis.
- 2.8 The housing requirements for each level of the Settlement Hierarchy appear to be arbitrary and pay little attention to the opportunities that are available at individual settlements.

Winchester

- 2.9 Wates supports the vision for Winchester as set out in paragraphs 12.1 – 12.2:

The area referred to by the city council as Winchester Town consists of the Winchester Wards plus the adjoining built up areas of Badger Farm, Oliver's Battery and Harestock, as defined on the Policies Map. It is compact, vibrant, distinctive, and located within a remarkable natural setting. It has played an important role over the centuries as a seat of political and religious power, and it is still a major centre of civil government, the law and the military. The Cathedral, the College and the Universities are also great Winchester institutions. The town has a thriving cultural life with museums, galleries, many fine art installations and live performances occurring throughout the year.

The unique characteristics of Winchester Town include historic and cultural assets of exceptional quality. The town is set in some of the most beautiful landscape in the country, and is connected both physically and visually to the surrounding countryside and the South Downs National Park. The river Itchen flows through the heart of Winchester, with its tranquil water meadows reaching right into the town itself.

- 2.10 Wates, however, firmly believes that Winchester has a greater capacity for development than is presented in the Local Plan, not least if Pudding Farm is included as an allocation. This would reflect the proposed allocations W2 – Sir John Moore Barracks and W4 - Land West of Courtenay Road, which are both in 'strategic gaps' but these gaps do not outweigh the need for new homes.
- 2.11 Increasing allocations at Winchester could go some way to meeting the potential under supply identified in these submissions. Wates also notes that central Winchester brownfield sites have a long history of non-delivery, therefore more greenfield sites will be needed to bolster delivery: All of which would help to ensure development is delivered in the most sustainable locations.
- 2.12 Wates also believes that its vision for Pudding Farm aligns with the Council's aspirations for Winchester. The site can provide housing, as a scale that provides for some local needs, but can deliver quickly and critically, the housing can be provided alongside significant areas of open space that will preserve the urban edge of Winchester and avoid merging into any surrounding settlements. Being specific about the justification of 'green gaps', their function and quality is necessary in policy and can be enshrined through a site-specific allocation which delivers specifically protected open space – rather than a potential arbitrary open space or settlement boundary.
- 2.13 The housing land capacity in the city of Winchester is underestimated, also because the assessment relies on ward/parish boundaries, which are very tightly drawn. For example, Pudding Farm is spatially well relates to the city, and should be considered as part of the potential land supply for Winchester city, it is erroneously county as Headbourne Worthy, and while it is acknowledged that this is the parish where the land is situated, it does not help the council, or any other reader of the SHELAA to understand the proper capacity of the city.
- 2.14 In the same way, the infrastructure capacity of the city of Winchester should be considered in the way that it provides for a wider area than just the tightly drawn ward/parish area. Development at Pudding Farm would use – and support the improvement – of infrastructure in the city of Winchester, and for communities at the edge of the city.
- 2.15 There is a greater capacity for development in the city of Winchester than is expressed in the Local Plan. More sites will need to be allocated, and Pudding Farm should be allocated to deliver more much needed homes.

2. 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?

- 2.16 Wates' assessment of the overall spatial strategy is that it is, in principle, sound. The Council has considered the sustainable delivery of development based on the current level of services and facilities in the Local Plan area. There are some flaws to this approach, especially when the capacity for new services and facilities is given little consideration, but nevertheless, the Council's approach is an appropriate strategy.
- 2.17 Regarding alternatives, the Council appears to have focussed on the distribution of development – i.e. spreading out development evenly or proportionately relating to the position of sites in the hierarchy. This is a reasonable consideration of alternatives, which may need to be revisited should a higher quantum of housing need be identified through the examination.

3. 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?

- 2.18 The Settlement Hierarchy evidence, and the supporting Infrastructure Delivery Plan, as explained in our response to question 1 above, also point towards additional capacity in Winchester in particular.

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

- 2.19 Wates has comment to make on this matter.

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

- 2.20 No. Wates' view, is that there is greater capacity for development across the Local Plan area, and there is an increasing need for new homes that can be met in sustainable ways, in sustainable locations.
- 2.21 The Council will need to review its Local Plan in short order, for it to be capable of enduring, and engaging with increased housing needs (even if it does not require major modification through this examination), and as such the capacity of settlements – especially the city of Winchester and its immediate surroundings – should be updated.

6. 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 Wates is generally of the view that the Council has pitched its strategy soundly in terms of using previously developed land, and greenfield sites. Inevitably, some greenfield sites will need to be developed, and these are often the sites that can bear a higher weight of obligation (S106/CIL) because there are fewer 'abnormal costs' such as site clearance and ground contamination

remediation. Greenfield sites are therefore more likely to deliver affordable housing at greater scale; a view which is supported by the Council's viability work, and assessment of site typologies.

- 2.23 The chronic need for new homes; the national prerogative to boost significantly their supply; and, affordability challenges locally all point towards the need for the Council to allocate more sites for delivering new homes, including land at Pudding Farm.

