



EXAMINATION OF THE WINCHESTER DISTRICT LOCAL PLAN 2020-2040

MATTER 2: SPATIAL STRATEGY AND DISTRIBUTION OF DEVELOPMENT

On behalf of Wates Developments Ltd.

April 2025

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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 to the rear of Thodys, New Farm Road, at the western edge of New Alresford ("the site" or "Land to the rear of Thodys")
- 1.3 Wates controls The site is identified in the Strategic Housing & Economic Land Availability Assessment (SHELAA) (December 2021) as site reference NA01.
- 1.4 The SHELAA confirms that the site is 'deliverable' and 'developable' with only very limited environmental, historical, or physical constraints. Wates confirms that the site remains available for development. It is therefore considered wholly suitable for allocation through the Local Plan, or the subsequent Neighbourhood Development Plan.
- 1.5 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.
- 1.6 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.
- 1.7 In this submission, Wates sets out its responses to Matter 2: Spatial strategy and distribution of development.
- 1.8 This statement should be read in combination with Wates' responses to the Inspector's others Matters, especially with reference to its response to Matter 8.

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 at New Alresford.

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.

New Alresford

- 2.9 The Local Plan's spatial strategy must allow housing on the edge of sustainable settlements in the district on a proportionate basis, to ensure the local services and facilities are maintained and to

improve levels of affordability at Market Towns in the more rural areas. This should include allocating Wates's land interests at New Alresford for about 75 new homes.

- 2.10 It is important to allocate a range of housing sites, including small and medium sized developments, to ensure that the supply and delivery of new homes can be maintained throughout the plan period. This will ensure the timely delivery of new housing and will enable a mixture of sites to come forward to meet housing requirements across the entire Plan period.

- 2.11 Wates considers that the allocation of Land to the rear of Thodys is reasonable and should be considered as part of the Council's Local Plan as it would help ensure a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability, in accordance with Paragraph 70 of the NPPF:

"...authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability."

- 2.12 Wates also notes that there is an emerging Neighbourhood Development Plan (NDP) in New Alresford, and this is referenced in the emerging Local Plan. We consider that it could be appropriate to allocate Land to the rear of Thodys in a NDP, subsequent to the Local Plan, but the Council will need to be confident that the NDP will be completed in a timely fashion to support the housing land supply and "mix of sites" across the district.
- 2.13 Wates is pleased to note that New Alresford is identified as a Market Town in the Local Plan. Market Towns are settlements with a good level of services and facilities, which gain a 'score' of 30 or more in the Council's settlement assessment work. Market Towns are therefore rightly considered to be sustainable locations for new development.
- 2.14 Wates is pleased to read paragraph 14.28 of the Local Plan, which recognises the potential for growth at New Alresford:

It is expected that there is capacity for the development of about 610 dwellings in New Alresford

- 2.15 Wates remains concerned at the somewhat arbitrary nature of the figure of 610, and that this is not fully justified in evidence, instead it is a reflection of completion in recent times. Wates further notes that the proposal in the Local Plan is to rely on – and 'roll forward' – allocations for the extant Winchester Plan. Whilst this can be an appropriate strategy, the Council will need to demonstrate that these sites are deliverable in the plan period and has confidence that their continued allocation is suitable.

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 toward additional capacity in New Alresford in particular. The Council's decision to choose a dwelling requirement in the Settlement Hierarchy of 1375 dwellings for Market Towns, with only an additional 200 dwellings per settlement for the next 15 years, is not clearly justified, especially when the Council's evidence demonstrates that there is capacity for many more dwellings.

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

- 2.19 Wates has no 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, as set out in response to Matter 8, is that the capacity for development in the Market Towns and Rural Areas – and specifically in New Alresford – has been underestimated, and underutilised.
- 2.21 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.
- 2.22 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 additional sites – including Land to the rear of Thodys – should be allocated for development.

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?

- 2.23 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.

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, and to make the most efficient use of sites which have been allocated. Land to the rear of Thodys should be allocated to deliver about 75 dwellings.

