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# **EXAMINATION OF THE WINCHESTER DISTRICT LOCAL PLAN 2020-2040**

## **MATTER 5: SITE ALLOCATION METHODOLOGY**

**On behalf of Wates Developments Ltd.**

**April 2025**

**Carter Jonas**

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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 5: Site allocation methodology.
- 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 SITE ALLOCATION METHODOLOGY FOR PROPOSED HOUSING, MIXED-USE AND NON-RESIDENTIAL SITE ALLOCATIONS IS JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY.**

### **Methodology and application**

#### ***1. How have the proposed allocations been identified?***

- 2.1 The Council sets out in its Development Strategy and Site Selection paper (SD10b) that the starting point concerning the availability of suitable sites was the 2021 Strategic Housing and Employment Land Availability Assessment (SHELAA). The SHELAA exercise is an initial assessment of the suitability, availability and achievability of sites promoted for development in the Plan area. Wates and Carter Joans engaged with this early stage of plan making and submitted Land to the rear of Thodys for assessment.
- 2.2 Wates notes that all the SHELAA sites were assessed through the Integrated Impact Assessment (although as highlighted under Matter 2 this did not fully consider the capacity of sites) and this informed the shortlisting of sites for inclusion in the draft Regulation 18 Local Plan.
- 2.3 Land to the rear of Thodys was not suggested as an allocation for that Reg. 18 consultation, and Wates responded to suggesting for very sound and robust reasons – set out at the end of this submission – why the site should be allocated.
- 2.4 The Council undertook further work in response to the Reg. 18 consultation and other engagement with local communities and Parish Councils.
- 2.5 The site along with several others was then included in an updated SHELAA which was published by the Council in 2023.
- 2.6 Ultimately the site was not included in the publication (Reg. 19) version of the Local Plan which is now the subject of this examination. Wates remains confident that Pudding Lane should be allocated, and is deliverable. Moreover, the site has been promoted by Wates through the Local Plan drafting exercise, and it has been accompanied by visioning work, and technical data.
- 2.7 Further detail on this question is included in our response to Matter 8.

#### ***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?***

- 2.8 Yes. Notwithstanding Wates' concerns about housing numbers included in the other policies mentioned in this question, the proposed allocations are in accordance with the overall strategy of the Local Plan.

#### ***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?***

- 2.9 Wates has no comments to make in response to this question, relating to its land interests at Land to the rear of Thodys.

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

2.10 No comment

***The Council is requested to address the above questions 1-4 in general terms in relation to the proposed allocations.***

**Site specifics**

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

2.11 Wates has no comments to make in response to this question, relating to its land interests at Land to the rear of Thodys.

2.12 ***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.'***

2.13 Wates remains unconvinced by the arbitrary nature of the housing requirement, and supply tables set out in the Local Plan. As is set out on several occasions in Wates written submissions to this examination, the settlement hierarchy, and the subsequent housing requirement tables do not make full use of the evidence which is intended to support them. There is greater capacity in New Alresford, and this should be reflected in the expectation for new homes, and in an allocation of Land to the rear of Thodys.

