



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 on the northern edge of Sutton Scotney ('the site'). The site is identified in the 'Regulation 19' consultation draft of the Local Plan under draft Policy SU01 'Land at Brightlands'
- 1.3 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.
- 1.4 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.
- 1.5 In this submission, Wates sets out its responses to Matter 2: Spatial strategy and distribution of development.
- 1.6 This statement should be read in combination with Wates' responses to the Inspector's other 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 SU01: Land at Brightlands.

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.
- 2.9 In the Development Strategy and Site Selection Topic Paper (SD10b) the Council explains that:

6.48 *The Regulation 18 draft Local Plan did not include a proposed allocation at Sutton Scotney due to concerns over the availability of wastewater infrastructure. Since then, considerable progress has been made on the construction of a new sewerage pipeline between Sutton Scotney and South Wonston that is anticipated to be completed by the end of 2024. The new sewerage pipeline, which is currently under construction, has been designed to be of sufficient size to be able to meet the current needs of the village and surrounding area, and to provide additional capacity for additional development in the village (up to an additional 120 dwellings).*

2.10 In the Site Selection Paper - Sutton Scotney (DS02) it further explains that:

... Part of the testing of the distribution of development entailed considering the capacity of infrastructure, and in particular the disposal of wastewater.

2.11 Wates also notes that in the Infrastructure Delivery Plan (Document IN01) there is only a limited amount of infrastructure improvement required alongside development of Brightlands (sewerage – as above – open space and health provision) therefore the capacity of other services is assumed to be sufficient.

2.12 In light of the above, the allocation at Brightlands should be increased to 120 dwellings to reflect the evidence base on site capacity. Further detail about the Brightlands site is given in response to Matter 8, but in short, the under allocation of the site is unjustified and puts at risk further greenfield sites where it does not make efficient use of the scale of the site allocated.

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?

2.13 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.

2.14 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?

2.15 The Settlement Hierarchy evidence, and the supporting Infrastructure Delivery Plan, as explained in our response to question 1 above, point toward additional capacity in Sutton Scotney in particular. The Council's decision to chose a dwelling requirement in the Settlement Hierarchy of 360 dwellings for Intermediate Rural Settlements, which equates to an allocation in Sutton Scotney of only 60 dwellings is not clearly justified, especially when the Council's evidence demonstrates that there is capacity for 120 dwellings.

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

2.16 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?

- 2.17 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 Sutton Scotney – has been underestimated, and underutilised.
- 2.18 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.
- 2.19 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 allocated sites – especially SU01: Land at Brightlands – 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?

- 2.20 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.
- 2.21 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. SU01: Land at Brightlands should be allocated to deliver 120 dwellings.

