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

## **MATTER 4: MEETING HOUSING NEED**

**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 4: Meeting housing need.
- 1.6 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: WOULD THE OVERALL STRATEGY AND PROVISION FOR HOUSING DEVELOPMENT BE JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY?

### The overall supply of housing

**1. *Would the housing trajectory provide a sound basis for meeting the identified housing need and accord with NPPF paragraph 78, which requires a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites? Does it identify a supply of specific, deliverable sites for five years following the intended adoption and specific, developable sites or broad locations for growth for the subsequent years 6-10 and, where possible for years 11-15 of the remaining Plan period, in accordance with NPPF paragraph 69?***

2.1 No. Wates does not consider the housing trajectory in the Local Plan to provide the requisite level of detail. The Council has provided a trajectory with a good level of detail in its Housing Topic Paper (Doc: ED02), and it is suggested that this is perhaps a better template to use for the Local Plan, and for monitoring purposes.

**2. *Is the housing trajectory realistic and deliverable? Are there any threats to delivery?***

2.2 Wates has considerable concerns about the lack of realism shown in the Local Plan trajectory, and its overall robustness.

2.3 In the Housing Topic Paper - addendum (Doc: ED02) the trajectory appears to show that there is in fact a shortfall in the Council's supply of some 79 dwellings. This suggests that more sites are needed to meet the Council's identified housing requirement of 15,465 dwellings over the plan period.

2.4 Allocating Land at Brightlands, Sutton Scotney, for its appropriate capacity of 120 dwellings (an increase of 60 dwellings) would go some way to meeting this deficit. As is explained in our Matter 8 statement, and shown in the masterplan which accompanies that statement, 120 dwelling can be delivered on the site in a suitable, and sustainable way.

2.5 Wates also notes that there is no room for manoeuvre in the trajectory, there is no allowance for lapses in permissions, failure in site delivery, or the stalling/delay of other sites. It is likely therefore that more sites will be required to provide a buffer for the Council in its overall delivery strategy.

**3. *Is the contribution towards housing supply from windfall justified? Is there compelling evidence that they provide a reliable source of supply in accordance with NPPF paragraph 72?***

2.6 Wates is content that the contribution from windfall is reasonable and proportionally justified in the Windfall Assessment Report (Doc: HA07).

**4. *In broad terms, is the housing development proposed in the Plan and set out in the trajectory based on a sound understanding and robust evidence?***

2.7 In general terms, Wates is content that the lead in times and build out rates indicated in the housing trajectory is sound. The trajectories for some of the large-scale sites, and complex regeneration projects appear a little optimistic, but it will be for the Council to remain vigilant in its monitoring, and nimble in its actions in response (i.e. by allowing other consents) should any of those allocations stall. This also speaks to the lack of 'buffer' in the overall allocation of sites compared to the identified requirement; if

the Council was a little more positive in its number of allocations, then there would be more scope of optimism in its trajectories.

- 2.8 However, and foreshadowing the next question, the trajectory is unacceptably and unsoundly based on an artificial and unjustified suppression of “new greenfield sites.”

**5. Policy H2 holds back permissions for new greenfield site allocations until 2030 to prioritise previously developed land, achieve a more even housing trajectory and level of development over the Plan period. What would be the expected impacts on housing land supply, 5 year housing land supply, delivery of a variety of sites and matters such as nutrient mitigation and thereby nutrient neutrality requirements and electricity grid capacity?**

- 2.9 Wates believes policy H2 to be completely unjustified, and unsound. Policy H2 fails to present a positive response to the urgent need for housing in England and limits the opportunity to boost housing land supply.

- 2.10 Furthermore, it is noted that the policy is inconsistent with Paragraph 60 of the Framework which states that:

*“To support the Government’s objective of significantly boosting the supply homes, it is important that a **sufficient amount and variety of land** can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.” (our emphasis)*

- 2.11 Section 6 of the Housing Topic Paper (Doc: SD10g), published in support of the emerging Local Plan, sets out the detailed justification for the phasing policy and how it intends to operate. The reasons sets out by the Council are summarised below:

- Given the high level of commitments and existing Local Plan allocations, the only realistic ‘lever’ available to promote more housing in the later part of the Plan period, so as to level out housing delivery, is to use phasing to hold back new Local Plan allocations.
- A large part of the housing commitments are greenfield sites of various types and sizes, as illustrated by the AMR information on housing commitments and recent brownfield / greenfield development. Reflecting on the emphasis on prioritising brownfield sites, the Regulation 18 Plan sought to hold back new greenfield allocations
- Phasing new greenfield sites to hold them back until after 2030 coincides with Government requirements for water companies to reduce nutrient discharges (which is a constraint and cost within Winchester District).
- It has become evident that the capacity of the Scottish and Southern Electricity Networks (SSEN) electricity grid poses a potential issue. Planning for long-term infrastructure needs is important to ensure that the community is resilient to future challenges and capable of accommodating growth without compromising quality of life.

- 2.12 Against the above points, Wates is of the following view:

- The Council’s attempt to create an artificial housing trajectory in order to ‘level out housing delivery’ fails to account for the variable nature of the housing market in the District. In the absence of a buoyant market, there is a risk of insufficient completions being achieved in the plan period. This in turn is likely to increase the affordability ratio in the District. Furthermore, the proposed policy does not account for site-specific circumstances which change over time and makes the phasing strategy less robust.

- As set out in the WMS, brownfield development alone will not be enough to meet the existing unmet housing and commercial needs. The proposed principle of prioritising the delivery of development on brownfield sites during the early phases of the plan period is likely to deter and delay sustainable development in the District. It is considered that the most strategic way to meet the housing demands of the District is to undertake a 'housing first approach', where high quality housing in available and deliverable locations are encouraged. Furthermore, brownfield redevelopment is expensive and can lead to viability challenges, where the Council will have to inevitably make concessions on matters such as affordable housing provision or other infrastructure impacts.
- The proposed upgrades to wastewater treatment works presents only part of the solution in reducing nutrient discharge. To drive forward nutrient neutrality in the District, localised mitigation solution must be encouraged to create wider sustainability benefits. The land at Brightlands presents an opportunity to reduce the nutrient runoff into the Test by ceasing intensive agricultural activities on the land and the use of associated fertilisers. Thereby, making nutrient neutrality achievable. While Wates notes that current environmental challenges need to be addressed pragmatically, it considers that there is no merit in delaying the delivery of allocated greenfield sites where it can be demonstrated that appropriate forms of mitigation can be employed on a site.
- The concerns cited with regard to the capacity of the electricity grid should not be presented as a barrier in the delivery of homes on allocated greenfield sites. A balanced approach should be undertaken to overcome the competing crisis of housing and energy. The Government has been steering reforms to address the energy crisis with the Connections Actions Plan being published at the end of 2023 outlining the need slim down queue of viable progressing projects aligned to the country's strategic need. The Council must engage with energy providers and regulators and seek to secure wider and coordinated enabling works instead of delaying the vital delivery of homes.

2.13 The Council's proposed phasing of new greenfield housing sites allocated in the Local Plan is contrary to the NPPF and will likely create a barrier to the sufficient amount and variety of land to come forward and meet the critical need for housing.

**6. *In the absence of a stepped trajectory would the approach taken by the Council be effective, justified and consistent with national policy to significantly boost the supply of homes (NPPF paragraph 60)?***

2.14 No. See comments above.

