



EXAMINATION OF THE WINCHESTER DISTRICT LOCAL PLAN 2020-2040

MATTER 5: SITE ALLOCATION METHODOLOGY

On behalf of Wates Developments Ltd.

April 2025

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CONTENTS

1.0 INTRODUCTION	3
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.	4
Methodology and application	4
Site specifics (Brightlands)	6

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 5: Site allocation methodology.
- 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 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 an submitted land at Brightlands 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 Sutton Scotney did not have any suggested allocation for that Reg. 18 consultation, and the reason cited for this was wastewater capacity, however, Wates responded to that consultation and suggested that:

Land at Brightlands (North of A30), Sutton Scotney is considered to be a sustainable location for new development (as set out above) that is able to connect into existing infrastructure, as part of a sustainable new residential development. The site has the potential to deliver about 120 homes, which would make a significant contribution to the viability and vitality of Sutton Scotney.

The site should be allocated for a residential-led development of about 120 new homes in the Local Plan. Land at Brightlands is available now and is deliverable within a five-year period.

- 2.4 The IIA assessment of land at Brightlands was specifically reviewed by Wates, and the following submissions were made:

Integrated Impact Assessment (IIA)

Wates has reviewed the supporting Integrated Impact Assessment (IIA) for the Local Plan and is concerned that there is a lack of consistency between the SHELAA site assessments and those in the IIA.

Moreover, Wates' view is that many of the sustainability challenges identified in the IIA are either overstated, entirely manageable or mitigatable, or have not been appropriately balanced with the benefits of development.

IIA1: climate change mitigation: It is accepted that greenfield development options are unlikely to 'score' in a very positive way when considering climate change mitigation or adaptation. However, the approach to development, the inclusion of modern construction techniques, and the choice of materials will make a difference as will the layout of development which will consider the orientation of buildings and the inclusion of open space and a biodiversity net gain.

IIA2: travel and air quality: As a more rural development option, development at Sutton Scotney is unlikely to achieve a strong positive score for 'travel.' This is accepted, but the need to support local communities – their social needs, and the continued viability of rural businesses – must not be overlooked.

IIA4: health and wellbeing: Development site options in more rural settings are likely to have access to the countryside, and open space so a positive score here is supported.

IIA7: services and facilities: It is disappointing to see a 'minor negative' assessment for this criterion. Whilst Sutton Scotney is not a major urban centre, like Winchester, there is a reasonable level of services and facilities in the village. It might be more appropriate to assess sites relative to the position of the associated settlement in the hierarchy. In this way, development options would more effectively recognise the value of development in rural locations which supports local community facilities to maintain vitality.

IIA8: economy: It is difficult to understand this assessment as 'negligible.' Whilst the site is unlikely to provide long term employment, part of the justification for rural development – as recognised in the NPPF – is to support the rural economy. This is to support rural enterprise through more users in the local community (an increase in the population) and thus more spending, but also providing the opportunity for people to live closer to where they might work in rural areas.

IIA9: biodiversity and geodiversity: There is a tension here, where the assessment in the IIA is a "significant negative" but the SHELAA assessed all biodiversity matters as 'green.' Wates tends towards the latter assessment, as it has demonstrated through these submissions and the associated Vision Document – biodiversity will be managed, and a net gain achieved.

IIA10: landscape and IIA11: historic environment: Wates agrees with the 'negligible' assessment here, as neither will be significantly affected.

IIA12: natural resources: Wates notes the same tension here between the IIA and the SHELAA assessment as for biodiversity. Consistency is called for, and Wates commends its evidence to the Council on these matters.

IIA13: water resources: The challenges of water management in the area is noted by Wates, and is also noted as a general challenge to development, not necessarily a site specific matter.

IIA14: flood risk: Wates agrees with the 'negligible' assessment here, as the site is almost entirely in Flood Zone 1 – where there is a very small amount of FZ 2&3 in the south western corner this would be excluded from the developable area.

- 2.5 The Council undertook further work in response to the Reg. 18 consultation and other engagement with local communities and Parish Councils.
- 2.6 The site along with several others was then included in an updated SHELAA which was published by the Council in 2023.
- 2.7 Ultimately the site – again with others – was included in the publication (Reg. 19) version of the Local Plan which is now the subject of this examination. This is supported by the SHELAA evidence, the updated IIA, the settlement hierarchy work, the Infrastructure Delivery Plan, and a specific topic paper for the site allocation in Sutton Scotney (DS02). 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.

- 2.8 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?**
- 2.9 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?**
- 2.10 Wates is particularly concerned about this matter. Land at Brightlands has been consistently presented as a site with capacity for 120 dwellings; the site can accommodate a range of dwelling types and sufficient open space and landscaping to make it an appropriate development – see our response to Matter 8. However, the Council – which considers the capacity of the site to be 95 dwellings in the SHELAA – has completely arbitrarily allocated the whole site for only 60 dwellings.
- 2.11 The Council has used the site area which was presented to them by Wates and Carter Jonas through the 'call for sites' / SHELAA exercise but has nowhere fully justified the use of the whole site, for only half its capacity.
- 2.12 Wates explained in its submissions at Reg. 19 that the proposed allocation risks underutilising the site, which is not “an effective use of land” as required by the NPPF at paragraph 123.
- 4. How would the proposed allocations provide flexibility in the event that some sites do not come forward?**
- 2.13 No comment
- The Council is requested to address the above questions 1-4 in general terms in relation to the proposed allocations.***

Site specifics (Brightlands)

- 5. In addition, for each site allocation the Council should provide evidence to justify their delivery within the Plan period.**
- 2.14 Wates has set out in response to Matter 8 significant detail about the deliverability of Land at Brightlands. It can be delivered during the Plan period, and it is Wates firm view that it can, and should be allowed to deliver in the early part of the plan period and start (if not also finish) within the first five year.
- 2.15 Under Matter 4 Wates has explained why policy H2 and the artificial suppression of housing delivery is unjustified and unsound. Housing can deliver quicker, and more comprehensively than is being 'allowed' by this plan. policies relating to phasing should be removed from the plan as they are unjustified, and are not positively written.
- 6. 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.’?

- 2.16 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 Sutton Scotney than for 60 dwellings and this should be reflected in the expectation for new homes, and in the allocation for Land at Brightlands.

