



# Winchester Local Plan Examination: Response to Matter 2

Fairthorne Grange Farm and Brindle Farm, Botley Road, Whiteley

**Boyer**

Prepared on behalf of Vistry Homes Ltd | April 25

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**REPORT CONTROL**

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## **1. INTRODUCTION**

- 1.1 This Hearing Statement has been prepared by Boyer on behalf of Vistry Homes Ltd ('Vistry'), in response to the Inspector's Stage 1 Matters, Issues and Questions ('MIQs') in relation to the examination of the Winchester District Local Plan 2020-2040 ('Local Plan').
- 1.2 Boyer has prepared this statement in response to Matter 2: 'Spatial strategy and distribution of development Policies SP1, SP2, SP3, H1, H2, H3, and E1 and E2'
- 1.3 This Hearing Statement has been prepared in respect to the promotion of Fairthorne Grange Farm and Brindle Farm, Botley Road, Whiteley. The comments in the Hearing Statement relate only to those questions which are pertinent to Vistry's interest.
- 1.4 Representations were submitted by Vistry Homes Ltd to the Regulation 19 Consultation on behalf of Vistry.

## 2. RESPONSE TO MATTER 2

**Issue 1: Issue: Whether the spatial strategy and distribution of development is positively prepared, justified, effective and consistent with national policy.**

**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?**

- 2.1 The Plan does not accommodate the delivery of a sufficient number of homes across the Plan Period, which is discussed further in our Statements relating to Matters 3 and 4. Additional housing is required across the hierarchy in order to provide sufficient housing, not just in the larger settlements.

**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?**

- 2.2 No, Vistry have concerns about Policy SP2. As outlined in the Hearing Statement for Matter 4, the sources of housing supply currently identified in the Plan will not meet the identified housing requirement. Whilst under the 2023 NPPF it is not necessary for the Plan to accommodate for the housing requirement identified within the 2024 Standard Method, the Council will need to address the uplift through an immediate Local Plan Review. It would be prudent for this Plan to start to accommodate for the higher levels of growth now to ensure they have a sound spatial strategy.
- 2.3 Otherwise it calls into question the soundness of the spatial strategy and development principles presented in Policy SP2. This is to say that even if the Plan is capable of adoption in 2025, as the Council hopes, its spatial approach risks becoming redundant almost from the outset of the plan's adoption. On this basis, the Council will find itself needing to allocate new strategic allocations/strategic growth areas to meet the dramatically higher housing targets now expected, and put in place by the Government.
- 2.4 To future-proof the Plan, additional sites should be allocated now, the identification and allocation of additional medium and smaller sites for allocation is of paramount importance for the success of the new Draft Local Plan's strategy and delivery. This is also important in light of the 20% buffer which will be applied to the requirement from 1 July 2026 which will impact the housing land supply. This is further discussed in relation to Matter 4.

**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?**

- 2.5 No. This Local Plan does not provide a long-term strategy for housing and economic growth based The Local Plan was submitted in order to meet the transitional arrangements and

escape the need to provide for the higher number of homes. However, they are failing to meet the transitional arrangements with no Policy to secure an early review and the Plan fails to take the opportunity to allocate additional homes to ensure a robust strategy. To future-proof the Plan, it would be sensible to allocate further sites now as part of this plan-making process, rather than await for the next plan review to be completed, which although may be expected by the NPPF (specifically paragraph 236) to commence as soon as the relevant provisions of the Levelling Up and Regeneration Act 2023 are brought into force in 2025, will still be undertaken against an as yet to be determined timescale.

- 2.6 The Plan should also accommodate a higher level of development to provide for more affordable homes. The Forward to the Local Plan is clear that there is a “*challenge in affordability*”, acknowledging that “*it is harder for all ages, and especially younger people, to find a suitable house they can afford*”. This is discussed further in relation to Matter 4.
- 2.7 The Plan should allocate additional sites across the settlement hierarchy, particularly within/surrounding North Whiteley. North Whiteley is strategically important, with its significant housing and economic role demonstrating its importance within the District. Additional allocations surrounding North Whiteley would support and benefit the substantial infrastructure investments being made in the locality including new schools, greenspaces and transport infrastructure. An appropriate site for allocation would be Fairthorne Grange Farm and Brindle Farm, Botley Road (site ref: CU32) which would form a logical extension to North Whiteley strategic allocation.
- 2.8 The Settlement Hierarchy Review does not include the areas of Whiteley or Waterlooville within the hierarchy. Whilst it is understood they are not settlements, they do nevertheless play an important role in the District, this is evidenced in the PfSH Spatial Position Statement where these areas are identified as locations appropriate for mixed use development. Paragraph 5.4 notes that Whiteley scores slightly less than market towns, even though it is not included in the hierarchy. On this basis additional sites should be allocated surrounding North Whiteley.
- 2.9 Re-organisation of Local Government through devolution is causing a large degree of uncertainty at present. It is important that this Plan provides sufficient housing and a robust strategy at this point rather than relying on a Local Plan review.

**4. Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?**

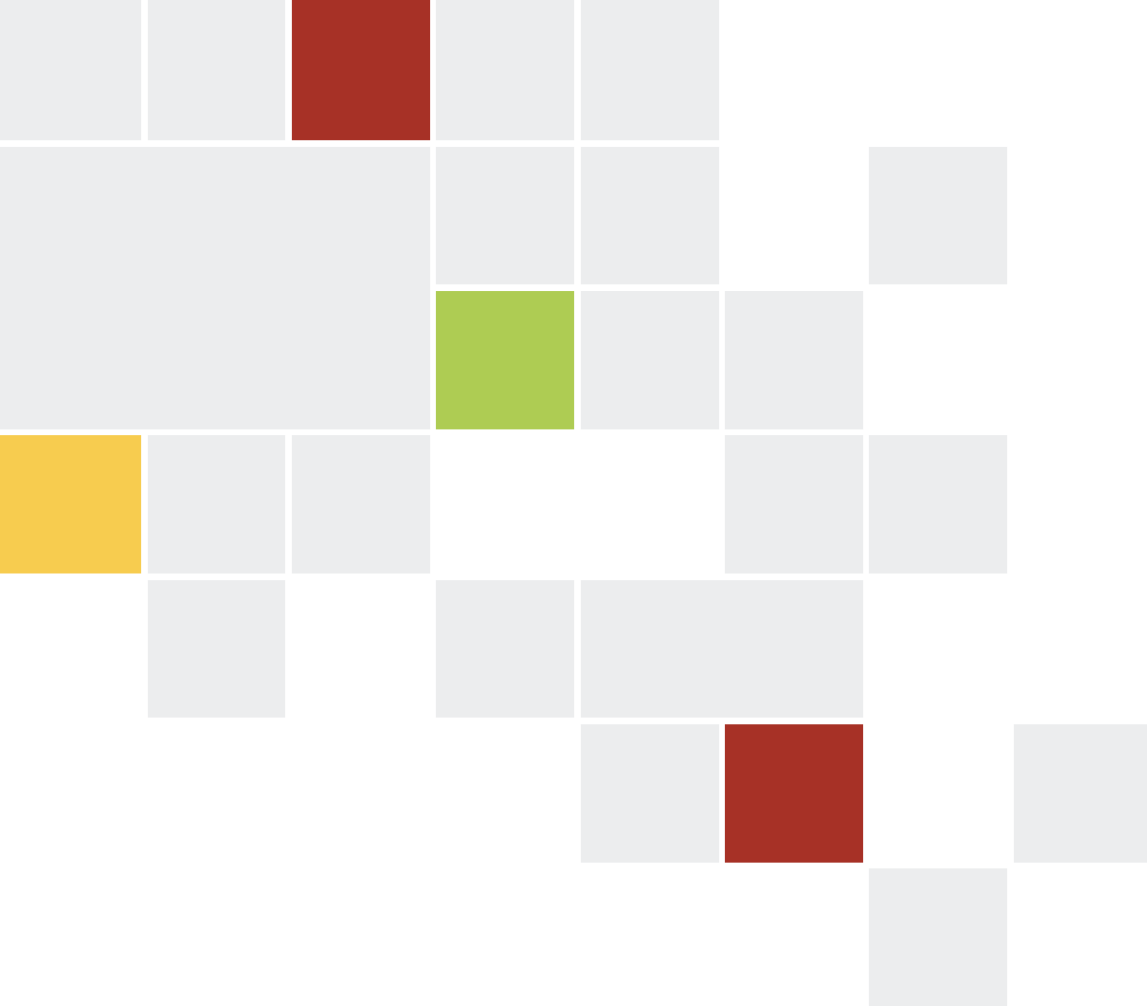
- 2.10 The Local Plan is heavily reliant on existing allocations which are brought forward into this Local Plan and from sites which benefit from planning permission but are not yet built out. Table 2 of the Local Plan sets out that only 2,875 homes will be on newly allocated sites.
- 2.11 Given the number of sites previously allocated in LPP1 and LPP2 (some of which have been allocated since 2013), there is reasonable doubt that some of the legacy allocations may still not be deliverable. Based on the lessons learnt through LPP1, to avoid the same delayed

housing delivery situation arising again through the next plan, additional sites should be allocated now.

- 2.12 The SHLAA, Table 10, demonstrates that land for 62,359 homes was promoted through the Call for Sites. There is scope, therefore, for WCC to allocate additional new sites in order to deliver more homes through this plan review. This would at worst go some way to future proofing the Plan against the increased Standard Method, which the next Local Plan Review will need to provide for.
- 2.13 The IIA considered 'reasonable alternatives' for Levels of Growth, relying on shortlisted HELAA sites, the identified preferences of Parish Councils and the feedback provided from previous Regulation 18 consultations. Therefore, the potential to provide for a significantly higher level of overall housing growth (for example, 3,000 to 5,000 additional dwellings above the current proposal) has not been properly tested in the IIA. This is a key shortcoming given the prevalence of unmet needs in the region and the pending uplift in the Standard Method.

**5. 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?**

- 2.14 No. The Plan relies heavily on brownfield sites, primarily within Winchester Town, including Sir John Moore Barracks and the Central Winchester Regeneration Area (allocated for 1,200 homes between them).
- 2.15 The development of brownfield sites is supported by the NPPF, and the principle is fully supported. However, Policy H2 proposes a brownfield first approach whereby greenfield sites are artificially held back until the later parts of the Plan Period, with brownfield sites coming forward at the start of the Plan Period. It is unclear why allocations on previously developed land should be expected to come forward more easily and quickly than those on greenfield sites. Indeed, the approach appears counterintuitive, noting that brownfield sites are often already occupied for a non-residential existing use or may otherwise be subject to complexities, constraints, such as contamination and viability concerns. Indeed, Lichfield's 'Start to Finish' document (3<sup>rd</sup> edition) finds that actual build-out rates were considerably lower on brownfield development sites than their greenfield counterparts. Therefore, the reliance on brownfield sites in the first half of the Plan-period will likely cause under-delivery.
- 2.16 Policy H6 refers to affordable housing, with a sliding tariff of 25% - 40% depending on the sites location and constraints. Brownfield sites are required to provide 30% affordable housing compared to 40% on greenfield sites. With greenfield sites restricted until later in the Plan Period, the quantum of affordable housing able to be delivered will be reduced in the earlier part of the Plan Period. It is also questionable whether the brownfield sites will be able to provide a policy compliant 30% affordable housing, if there are complexities on site which may impact viability.



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