



Winchester Local Plan Examination: Response to Matter 5

Fairthorne Grange Farm and Brindle Farm, Botley Road, Whiteley

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Prepared on behalf of Vistry Homes Ltd | April 25

REPORT CONTROL

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1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Boyer on behalf of Vistry Homes ('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 5: Site allocation methodology.
- 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 5

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

2.1 It is noted the Inspector has specifically requested WCC provide a response to questions 1-4 in relation to the proposed allocations. It is considered pertinent that Vistry also provide a response to the questions.

1. How have the proposed allocations been identified?

- 2.2 A document titled 'Development Strategy and Site Selection' forms part of the evidence base to the Local Plan. This document set out the stages of site allocation which started with a consideration of the existing site allocations which have not yet come forward. WCC then considered the sites within the SHELAA 2021 to consider new allocations with each site considered within the Integrated Impact Assessment.
- 2.3 The Integrated Impact Assessment provides an assessment of the site against a number of criteria. However, these assessments are undertaken using a 'policy-off' vs 'policy-on' approach. In this respect, sites proposed for allocation are evaluated based on potential mitigation measures (i.e., 'policy-on'), improving their scoring. This is explained in paragraphs 5.282 to 5.288 of the Main IIA Report. However, the potential for mitigation is discounted where omission sites are considered. This is apparent from the assessments undertaken in Appendix F of the IIA and the explanation commencing at paragraph 4.269 of the Main IIA Report. Indeed, this paragraph confirms that details provided by developers/site promoters (such as technical reports, emerging masterplans, and Vision Documents) were not considered when evaluating omission sites.
- 2.4 There is a lack of like-for-like comparison between allocated sites and omission sites and indeed the proposed suite of allocations may not represent the most sustainable of the available options.
- 2.5 With regards to South Hampshire Urban Areas, several sites adjoining North Whiteley were considered for allocation but only five are allocated on the grounds that they are contained by existing or proposed development. Only 200 new homes are allocated in North Whiteley, which given its significant housing and economic role within the District appears conservative. Land at Fairthorne Grange Farm and Brindle Farm, Botley Road would be a sound site to allocate due to its location immediately to the north/west of North Whiteley, safe vehicular access from Botley Road and ability to accommodate c. 430 homes.
- 2.6 Whilst the Development Strategy and Site Selection document highlights this site would extend development to the west of Botley Road into a more open area, there is an existing dense woodland located to the west of the site which would restrict views of the development from the wider area and would prevent further development to the west. As set out in the

Vision Document which supported Vistry's Reg. 19 reps, an ecological area would be located in the southern part of the site which would reinforce the relationship with the countryside.

- 2.7 Appendix 3 to the 'Development Strategy and Site Selection' includes full appraisals of the draft allocated sites but does not include any detailed assessment of omission sites. This makes it very difficult to compare the choice of sites allocated in the Local Plan.
- 2.8 Instead, an equal and transparent analysis of all sites should have been undertaken through the site selection process which incorporates supporting information in the same manner. Failure to undertake this task has disguised the potential of the Plan to deliver a higher housing requirement than proposed.

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 The Policies mentioned in this question relate to the spatial strategy, with Policy SP2 setting out the housing provision within the spatial areas and Policy H1 setting out the housing provision for the Plan Period.
- 2.10 The site allocations (both existing allocations brought forward and new allocations) technically provide sufficient housing to meet the requirement. However, as discussed in Hearings relating to Matters 2-4, Vistry has concerns in relation to the overall supply subject to an inappropriate Plan Period, reliance on extant planning permissions and previously allocated sites, lack of buffer applied and housing requirement adopted from 2023 Standard Method rather than from the uplifted 2024 Standard Method.
- 2.11 Given these concerns, it would be prudent for additional sites to be allocated to ensure flexibility and ensure sufficient homes are delivered across the Plan Period.
- 2.12 Policy H2 refers to the attempt to artificially restrict the delivery of greenfield sites in favour of brownfield sites. The allocation of brownfield sites is supported by the NPPF; however, the Local Plan places reliance on the delivery of brownfield sites in the early part of the Plan Period which appears to ignore the known complexities of delivering a brownfield site. Such complexities may include constraints such as contamination, viability concerns or even an existing use on the site.
- 2.13 Lichfield's 'Start to Finish' document (3rd edition) highlights that build-out rates are considerably lower on brownfield sites than their greenfield counterparts. Therefore, the reliance on brownfield sites in the first half of the Plan-period will likely cause under-delivery. Hence, the approach undermines the Plan's effectiveness as a whole. To counteract this, additional greenfield sites should be allocated to ensure the Plan does not under-deliver/fail.

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?

- 2.14 Appendix 3 of the 'Development Strategy and Site Selection' document contains an assessment of each allocated site; however, this provides no discussion on the site boundaries or discussion on the capacity assumed. It rather focuses on the principle of the site in terms of landscape sensitivity and heritage assets.
- 2.15 The capacities are only mentioned within the Local Plan and as such there is no justification or evidence provided to demonstrate how capacities have been calculated and whether they have been tested to demonstrate the capacities are appropriate for each site.
- 2.16 It is of fundamental importance to fully understand the capacities assumed for allocated sites. For example, the Local Plan allocates Sir John Moore Barracks for between 750-1,000 homes. The trajectory in the updated Housing Topic Paper assumes 900 homes will be delivered in the Plan Period (ending in 2037/2038 so two years before the end of Plan Period thus assuming no development would occur in the next Plan Period).
- 2.17 Firstly, the range of 750-1,000 homes is considerable for the site and the trajectory suggests 900 will be provided. This leaves a potential shortfall of 100 homes, including a shortfall of affordable homes, which will not be provided for across the Plan Period. The draft Policies should reflect up to date evidence-based work on the allocations.
- 2.18 There is a lack of Statement of Common Grounds between WCC and developers as to the capacity of the allocated sites and the likely delivery of them. This would be very helpful to ensure the information in the trajectories is correct and has been tested based on clear and informed evidence.

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

- 2.19 Table H2 of the Local Plan sets out the supply for 15,465 homes across the Plan Period. Of this, only 2,875 homes would come from new allocations. The remainder relies on completions, sites benefiting from planning permission but not yet built out, previous Local Plan allocations carried forward and windfall sites. This equates to the provision of 15,465 homes against a requirement of 15,465 homes with no buffer and no scope for any sites to deliver below their assumed capacity or not to be delivered at all. This also assumes that upper capacities are achieved on site which have a capacity range, such as Sir John Moore Barracks. As recent history in the District demonstrates non-delivery of allocated sites can, and does occur. For example, Clayfield Park was allocated in LPP1 and has not been delivered, with commercial uses still on site.
- 2.20 The Local Plan includes 4,770 homes comprising windfalls and new allocations. For both sources of supply, there will be inevitable delay or delivery under capacity. The lack of a buffer fails to provide any flexibility should these sites not come forward as anticipated. Once

again, when reflecting on the quantum of allocated sites being brought forward from the Local Plan Part 1 and 2, it is clear there has been a serious under-delivery of allocated sites historically, and a buffer should be provided to prevent such under-delivery occurring once again.

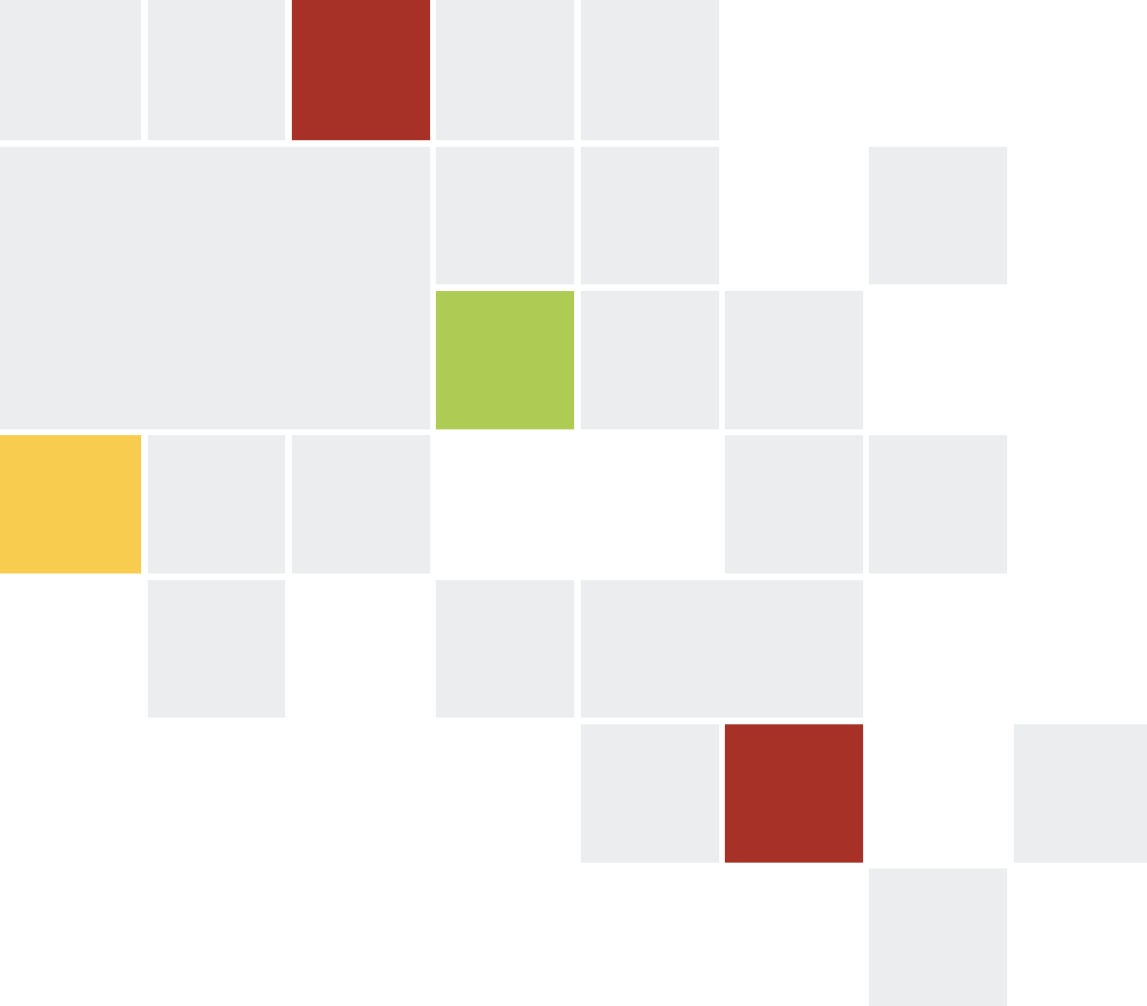
- 2.21 Therefore, on the basis of robustness and demonstrating an *effective* supply, the Council should still seek to include a buffer of at least 5% to account for a reduced windfall provision, over-estimation of development capacity of sites, and failed delivery circumstances. In addition, 6,780 dwellings already benefit from planning permission, and it is undoubtedly unrealistic to assume there will be no lapses within this provision. The inclusion of a buffer would provide some means to accommodate any losses due to lapsed permissions.
- 2.22 The other solution to providing flexibility within the Local Plan is to allocate additional sites to ensure overall delivery would meet the requirements, even if over-estimation of site capacity or lapse in delivery occurs.

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

- 2.23 Vistry agree that evidence of delivery should be provided for each allocated site.
- 2.24 It is noted the updated Housing Topic Paper now includes a detailed trajectory for each allocated site. However, there is no justification presented to support this trajectory. Accordingly, we have been unable to assess and test whether the stated trajectory is justified.

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.

- 2.25 Vistry agree that evidence should be provided against the assumed figures for completions, outstanding permissions, windfall allowance, Neighbourhood Plan allocations, extant Plan existing commitments and new site allocations. Vistry have a number of concerns with the supply assumptions, which is discussed in our Statements for Matter 4.



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