



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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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 Winchester, ('the site' or 'Pudding Farm').
- 1.3 The site is identified in the Strategic Housing & Economic Land Availability Assessment (SHELAA) (December 2021) as site reference HW03. The SHELAA confirms that the site is 'deliverable' and 'developable' with no identified environmental, historical, constraints, and only limited physical constraints (this includes flood risk, which is disputed). Wates confirms that the site remains available for development. It is therefore considered wholly suitable for allocation through the Local Plan.
- 1.4 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.
- 1.5 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.
- 1.6 In this submission, Wates sets out its responses to Matter 5: Site allocation methodology.
- 1.7 This statement should be read in combination with Wates' responses to the Inspector's others Matters.

Background

Wates Developments Ltd.

- 1.8 Wates is an expert in land, planning and residential development throughout England. The business focuses on securing land and delivering planning consents in sustainable locations, in areas of high demand.
- 1.9 As a family-owned business Wates shares a deep sense of responsibility to provide outstanding projects for customers which make a long-lasting difference to the communities in which it works.

Pudding Farm - Site Context

- 1.10 The site is located 2–2.5km to the north of Winchester city centre. The centre of Winchester offers a large and broad range of high-order services and facilities including retail, leisure, health and employment.
- 1.11 The Land at Pudding Farm extends to some 18.7 hectares in total and is split into four arable fields.
- 1.12 Barton Farm Cottages are located on Worthy Road, outside of the site boundary.
- 1.13 The site is bound by Abbott's Barton to the south, the St Swithun's Way to the east and the River Itchen to the north. Along the western boundary runs Worthy Road, beyond which lies the Kings Barton/Barton Farm development comprising 2,000 homes. Barton Meadows Nature Reserve, created during the Kings Barton Housing Development, also sits to the west of the site.

- 1.14 Wates has undertaken technical assessment of the environmental and technical features of the site which confirm that there are no significant physical, environmental or technical constraints that would preclude the development of the site for residential use.

Pudding Farm - Site Vision and Development Benefits

- 1.15 A team of specialist consultants has been appointed by Wates to research and review available technical information relating to the site and its context in order to accurately and robustly develop a deliverable vision for the site.
- 1.16 The accompanying Vision Document includes three concept masterplans which demonstrate that the site can deliver up to 150-200 homes and/or a Care Homes Village. Based upon the identified opportunities and constraints set out in the Vision Document, the development of the site has the potential to deliver:

Option 1: 150-200 new homes/care home village and the creation of a new country park

- 1.17 The mixture of parkland, natural and semi-natural areas seeks to maximise the Biodiversity benefits of the site and creates a sensitive interface with the countryside and safeguards against the potential for unchecked growth and coalescence with Headbourne Worthy.

Option 2: 150-200 new homes/care home village and the creation of a solar park

- 1.18 Solar farms are large-scale collections of photovoltaic panels. Capturing the sun's energy to generate electricity they feed into local and regional power grids. This will support to the Council to achieve the goal of carbon neutrality by 2030 and producing 550 megawatts of solar energy by 2030.

Option 3: 150-200 new homes/care home village and the creation of a new country park and solar park

- 1.19 This approach seeks to balance the environmental benefits of both the county park and solar park to address the key areas of both biodiversity and the natural environment and carbon neutrality.

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

Question 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 Jonas engaged with this early stage of plan making and submitted land at Pudding Farm 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 Pudding Farm was not suggested as an allocation for that Reg. 18 consultation, and Wates responded to suggesting for very sound and robust reasons – set out at in Appendix B – why the site should be allocated.
- 2.4 The Council undertook further work in response to the Reg. 18 consultation and other engagement with local communities and Parish Councils.
- 2.5 The site along with several others was then included in an updated SHELAA which was published by the Council in 2023.
- 2.6 Ultimately the site was not included in the publication (Reg. 19) version of the Local Plan which is now the subject of this examination. Wates remains confident that Pudding Lane should be allocated, and is deliverable. 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.
- 2.7 Further detail on this question is included in Appendix A, and Appendix B, which provides a case study in the approach to allocating sites in Winchester, and how some evidence was potentially overlooked.

Question 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?

- 2.8 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.

Question 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?

- 2.9 Wates has no comments to make in response to this question, relating to its land interests at Pudding Farm.

Question 4

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

- 2.10 No comment

The Council is requested to address the above questions 1-4 in general terms in relation to the proposed allocations.

Site specifics

Question 1

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

- 2.11 Wates has no comments to make in response to this question, relating to its land interests at Pudding Farm.

Question 2

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.'?

- 2.12 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 the city of Winchester and this should be reflected in the expectation for new homes.