

# ₩SLR

## **Winchester City Council**

## Local Plan 2020 - 2040

## (Regulation 19 of the Town and County Planning Act (Local Planning) (England) Regulations 2010)

Prepared on behalf of Vistry Group Ltd by SLR Consulting Limited

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SLR Project No.: 402.064888.00001

9 October 2024

Revision: 2

### **Revision Record**

Revision	Date	Prepared By	Checked By	Authorised By
1	20 September 2024	NB	CL	
2	9 October 2024	DH	CL	CL
3	9 October 2024	NB		
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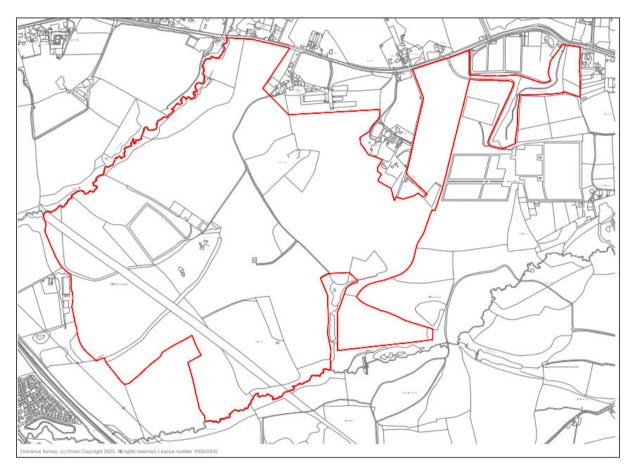
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## 1.0 Introduction

- 1.1 This representation is prepared by SLR Consulting Ltd (SLR) on behalf of Vistry Group Limited (Vistry) in response to the Winchester City Council (WCC) Local Plan 2020 – 2040: Proposed Submission Local Plan (hereafter the 'Local Plan') consultation.
- 1.2 Vistry have an interest in land to the east of Botley adjacent to the southern edge of the A334, known as Raglington Farm, which has also been identified as a Growth Area by the Partnership for South Hampshire. A plan identifying the land in which they hold an interested is appended to these responses at Appendix 1, with an extract provided below:



#### Figure 1 - Raglington Farm site location plan (Cooper Baillie)

- 1.3 This response is split into two parts.
- 1.4 Firstly, it will provide commentary on the approach to housing within the draft plan, with specific reference to the housing need and requirement, the large and growing unmet needs in the south Hampshire region and the proposed approach to the artificial delay in allowing new site allocations to come forward.
- 1.5 It will then go onto identify the significant opportunity presented by the land at Raglington Farm, East of Botley, to deliver a significant, sustainable new community to asssit in meeting the acute housing crisis in the region in an area already identified as having potential for housing growth by the Partnership for South Hampshire (PfSH).

## 2.0 Winchester District Housing Requirement

- 2.1 This section considers the housing policies of the draft plan focusing on the spatial strategy housing requirement and trajectory and spatial strategy.
- 2.2 The housing need within Winchester District equates to 13,565 homes for the period 2020-2040, based on the Standard Method as it stands now.<sup>1</sup> In addition, WCC, in recognition of the relatively unconstrained nature of the district, has proposed to provide an additional 1,900 homes towards unmet needs in neighbouring authorities. This brings the total housing requirement for the plan period, excluding the South Downs contribution of 350 dwellings, to 15,115.
- 2.3 WCC is commended for committing to both provide sufficient housing to meet their housing need as it stands now and make a contribution towards the unmet needs of neighbouring authorities. However, WCC's commitment to provide 1,900 homes above their Standard Method need is positive but does not go far enough.
- 2.4 The unmet needs within the sub-region are substantial and likely to grow significantly. WCC is one of 12 authorities that are members of the Partnership for South Hampshire (PfSH) whose purpose is

*'…to ensure joined up strategies, pooling of resources and delivery of transformational programmes that focus on better outcomes for local people.'* 

- 2.5 One of the greatest challenges facing the region requiring cross boundary working to better the fortunes of local people is the acute housing crisis. PfSH's latest agreed Spatial Position Statement dated 6<sup>th</sup> December 2023, confirms a deficit up to 2036 of 11,771 homes across the subregion. Whilst this may only be a 'snapshot' at a point in time, this deficit will likely get worse beyond 2036 if a new strategic solution is not identified and allocated.
- 2.6 Both Portsmouth City and Havant Borough Councils have also formally requested that WCC meet some of their unmet needs given the constrained nature of their plan areas.<sup>2</sup>
- 2.7 Furthermore, the new government has committed to reforming the Standard Method and boosting the supply of housing to try to meet this spiralling demand. The proposed new draft Standard Method would increase Winchester's need to 1,099 per annum, or, using their method of calculation, 19,977 dwellings over the plan period which exceeds the current requirement, even when the additional unmet need is factored in. As the Council are seeking to rush through under the transitional arrangement, they are in fact leaving thousands of people unable to find housing in the area, which will undermine the social and economic demands of the area.
- 2.8 Across the wider PfSH region, the calculated effect on the unmet need up to 2036, using the drafted Standard Method, is as follows:

<sup>&</sup>lt;sup>1</sup> Using past SM figures for years 2020-2024.

<sup>&</sup>lt;sup>2</sup> Appendices 1 and 2 of the Housing Topic Paper July 2024

Local Authority	Annual Housing Need using Standard Method (dpa) as at December 2023	Annual Housing need using draft SM	Total housing need 2023 – 2036 using draft Standard method (13 x draft SM figure)	Identified Supply = Commitments, local plan allocations + windfall estimate as at December 2023	Shortfall/ surplus using draft Standard Method
East Hants (part)	113	211*	2,743*	1,275	-1,468
Eastleigh	667	902	11,726	6,160	-5,566
Fareham	541	794	10,322	9,356	-966
Gosport	353	465	6,045	2,518	-3,527
Havant	516	874	11,362	4,105	-7,257
New Forest	1,056	1465	19,045	8,076	-10,969
Portsmouth	899	1098	14,274	11,304	-2,970
Southampton	1,475	1295	16,835	15,951	-884
Test Valley (part)	182	322*	4,186*	3,109	-1,077
Winchester (part)	235	385*	5,005	3,055 <sup>3</sup>	-1,950
Total	6,037	7,806	101,478	64,909	-36,634

\* based on % of whole of district figure – (19.6% East Hants / 35% Test Valley / 35% Winchester)

- 2.9 WCC's track record of facilitating delivery of three largescale strategic sites in recent times Barton Farm (Winchester), West of Waterlooville and North Whitley is helpful, and their success is demonstrated in the good level of delivery forecast for the early part of the plan period. It is a proven method of delivering new homes that works whilst providing the key infrastructure and facilities communities need in a sustainable way.
- 2.10 However, it is critical that more is done, and soon, to begin delivery of the next strategic site. This is evidenced by the sharp drop off in delivery from 2030 onwards as the existing sites near completion. The only practical way of plugging this forecast gap in delivery is to begin to plan for new strategic sites to replace the three existing ones.
- 2.11 WCC's proposal to withhold permissions on proposed new allocations until after 2030 is not considered an effective or reasonable mechanism for controlling the delivery of housing. Given the considerable need for housing <u>now</u>, WCC should not be artificially restricting the delivery of sites they otherwise consider suitable for allocation. Trying to rush through under the transition to keep the numbers of houses low is disappointing enough for those looking to

<sup>&</sup>lt;sup>3</sup> It is acknowledged that the PfSH report suggests that the actual supply within the PfSH part of the district may be higher than 3,055 as Winchester does not have a split in its adopted Local Plan between PfSH and the rest of the district. For consistency however, the supply of 3,055 is replicated across from Table 1 of the report.



get a house but to then further artificially deflate it further is not good planning or seeking to meet the social or economic requirements of the area.

- 2.12 Instead WCC should be considering as soon as possible the delivery of their next large scale strategic site in a location that is highly accessible and best located to meet the needs of both Winchester District and their neighbours.
- 2.13 Our contention is the Growth Area identified east of Botley, within which the land at Raglington Farm is a significant and clear part, represents such a location, as discussed further in the next section.
- 2.14 Based on the draft NPPF and the transition arrangements within it, WCC will, if their plan is adopted, need to begin an immediate review of their plan to accommodate the new housing need.

## 3.0 Raglington Farm, East of Botley – Strategic Growth Opportunity

- 3.1 The land at Raglington Farm, as indicated on the plan provided at Appendix 1, represents a significant opportunity to provide a highly accessible and sustainable new community to help meet both Winchester District and the wider south Hampshire region's housing needs.
- 3.2 This section will set out firstly some of the regional factors and evidence which indicates the site is a good location for growth, before providing some more site-specific commentary on why Raglington Farm represents a suitable site for a new community.

### **Good Location for Growth**

- 3.3 As set out in section 2, there will be both a district and regional need for a new strategic sized community to come forward if WCC and the wider region are to have any chance of addressing their already acute housing need. As mentioned previously, there is already an agreed unmet need within the PfSH region of 11,771 homes.<sup>4</sup> The new government has recently concluded a consultation on a new SM for calculating housing need. If adopted, this would result in unmet needs of *36,634* dwellings across the region.
- 3.4 PfSH have recognised the need to address this significant unmet need at a subregional level by considering potential 'Broad Areas of Search for Growth' (hereafter referred to as 'Growth Areas'). In 2023, to identify the Growth Areas, PfSH undertook an exercise focused on identifying Growth Areas that meet the following requirements:
  - Focus development on locations with a relative lack of significant constraints, both national constraints listed in the NPPF and additional constraints of subregional importance; and
  - Focus development at locations which are most accessible by public transport, walking and cycling, or have the potential to be made accessible.

(Spatial Position Statement December 2023 - paragraph 6.40)

- 3.5 The Broad Areas of Search for Growth were identified considering the combination of a relative absence of strategic constraints, relative proximity to opportunities and services, and their scope in principle for good public and active travel connectivity. This exercise identified several potential Growth Areas, including 'East of Botley (Winchester).'
- 3.6 Vistry agree with the identification of East of Botley, which would clearly and logically incorporate the land at Raglington Farm, as a suitable location for future growth.
- 3.7 Critically, its central location, relative to the sub-region, means it is capable of meeting a range of authorities' unmet needs in a highly accessible and central location close to the main rail and road transport corridor through the region.

<sup>&</sup>lt;sup>4</sup> Spatial Position Statement (06/12/2023) - Table 1

3.8 The area is highly accessible via a range of different transport modes. The table below summarises some of the key walking, cycling and driving times to local services and facilities.

Facility	Distance (m)	Walk time (mins)	Cycle Time (mins)
Hopscotch Botley Nursery	1900	23	7
Fairlands Day Nursery	2200	26	8
Curdridge Primary School	1800	22	7
Cornerstone Primary School, Whiteley	3500	43	14
Deer Park Secondary School	5100	61	19
Botley Railway Station	2000	24	8
Botley town centre	3400	41	13
Whiteley Shopping Centre	6300	76	24
Wickham Surgery	4400	53	17
BP Service Station	2300	28	9
North Whiteley new community	3500	43	14

3.9 The proximity of Botley Railway Station, within comfortable walking and cycling distance, also significantly heightens the sustainability of the site providing opportunities for onward access to Portsmouth, Fareham, Winchester and London. There are also longer term aspirations into the 2030s to further improve the Eastleigh to Fareham line on which Botley station sits to further improve the reliability and frequency of services.<sup>5</sup>

- 3.10 The area also benefits from significant and ongoing local investment, including
  - Construction of the new Botley Bypass due to be completed by 2027 providing faster trips by car, foot and cycle to Hedge End and Deer Park Secondary School.
  - New facilities provided as part of the North Whitley Strategic Development, including primary school and new local centre.
  - New employment opportunities and enhanced train station parking as part of the Sherecroft Farm development immediately east of Botley
- 3.11 New cycle and road infrastructure on the A3051, providing safe and faster journeys, including by cycle, to Whitley shopping centre (a destination shopping village) and the new facilities on the north Whitley strategic development.
- 3.12 These improvements collectively significantly increase the accessibility and sustainability east of Botley, providing ideal conditions for a sustainable new community.
- 3.13 Of course, a scheme of a strategic scale, as envisaged by the PfSH Growth Areas study would also likely be able to provide further local infrastructure improvements, including potential for onsite facilities to compliment the high levels of provision locally.

<sup>&</sup>lt;sup>5</sup> Strategic Investment Plan for the South East (March 2023)

- 3.14 The area is also relatively unconstrained as recognised by the Growth Areas identification study undertaken by the PfSH.
- 3.15 Strategically, the identification of the east of Botley Growth Area is logical and fully supported in order to make a significant contribution to delivering the new homes desperately needed in the south Hampshire region.
- 3.16 WCC have recognised the identification of the Growth Areas within the Local Plan, including the contribution they can make to meeting ongoing unmet housing need in the sub-region.

### **Raglington Farm new community**

- 3.17 Positioned just over 1.5km to the east of Botley, the Raglington Farm site plainly sits within the identified Growth Area as a central part.
- 3.18 The site is predominantly agricultural in use. A large area of Ancient Woodland, which currently hosts a Paintball Activity Centre, is located to the south of the site, accessed by an existing farm track. The site is well contained due to the site's topography and the Ancient Woodland located on the southern boundary of the site, making long distance view of the site difficult.
- 3.19 Vistry have already undertaken initial surveys of the site to better understand its potential for development. Surveys conducted so far include:
  - Topographical survey
  - Desktop Ecological Appraisals
  - Heritage Appraisal
  - Landscape Appraisal
  - Drainage and Flood Risk Appraisal
  - Odour Assessment in relation to existing farm uses on site
  - Access and Transport review
  - Utilities Searches
- 3.20 Vistry have also appointed a master planner to begin consideration of site feasibility options which we hope to be able to share in due course.
- 3.21 None of the assessments undertaken to date have indicated any overriding constraints preventing its development. Vehicular and pedestrian access appears to be achievable via the A334 and the potential for pedestrian improvements along the A334 is being explored. Whilst not considered essential, there may also be opportunities to provide pedestrian access to the south via the existing PRoW on site to connect to the recently improved cycle infrastructure along the A3051, albeit this is reliant on 3<sup>rd</sup> party land.
- 3.22 The importance of the Ancient Woodland on site is also recognised, which would be protected from development, with the potential for further enhancement.
- 3.23 The site's size also means there are opportunities to provide any mitigation, such as SANGs, and biodiversity enhancement to achieve a BNG on site.



- 3.24 Overall, the site, on its own or possibly in combination with other land parcels that may come forward at East of Botley, represents an ideally located opportunity to deliver a new community within an identified Growth Area.
- 3.25 Vistry have a track record of delivery of high quality homes, alongside community and highways infrastructure, in the local area, as demonstrated by the success of the North Whiteley development just to the south of the site. They are the UK's leading provider of affordable mixed tenure homes. Their purpose as a responsible developer is to work in partnership to deliver sustainable homes and communities.
- 3.26 Their partnership model includes social/affordable rent, intermediate tenures and home ownership/private sector. It enables them to potentially deliver enhanced levels of affordable housing provision. All their sites are developed with a partner; with a minimum of partner funded homes being 50%. The average partner funded homes equates to 65%, circa 13,000 homes per annum.
- 3.27 Overall, the site is plainly within the identified East of Botley Growth Area and is sustainably located to deliver a new community of homes, including significant levels of affordable homes. Vistry also have a track record locally of delivering strategic scale sites and look forward to continuing that track record at Raglington Farm, working with the Council and local community to deliver a new community at the site.

## 4.0 Summary

- 4.1 WCC's proposal to withhold permissions on proposed new allocations until after 2030 is not considered an effective or reasonable mechanism for controlling the delivery of housing. Given the considerable need for housing <u>now</u> and the lead in time for delivering strategic sites, WCC should not be artificially restricting the delivery of sites they would, on another occasion, consider suitable for allocation.
- 4.2 It is imperative that WCC consider planning now for the delivery of their next large scale strategic site in a location that is highly accessible and best located to meet the needs of both Winchester District and their neighbours.
- 4.3 Raglington Farm is a highly sustainable site with the potential to provide a significant number of dwellings plainly located in the identified east of Botley Growth Area. None of the assessments undertaken to date, as listed in paragraph 3.19, have indicated any overriding constraints preventing its development.
- 4.4 Access has been proven to be achievable from Botley Road and the site's size also means there are opportunities to provide areas such as SANGs, along with a biodiversity enhancement to achieve the required BNG on site.
- 4.5 Vistry have a national and local track record of delivering highly successful new, strategic scale, communities which, through their partnership model, can unlock enhanced levels of much needed affordable housing.
- 4.6 Overall, the site, on its own or possibly in combination with other land parcels that may come forward East of Botley, represent an ideally located opportunity to deliver a new community within an identified Growth Area and should be considered at the earliest opportunity.

#### SLR Consulting Limited

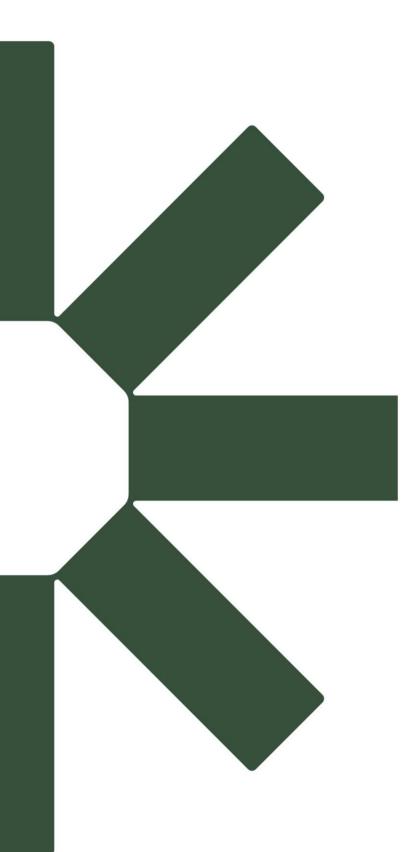


Principal Planning Consultant

## Appendix A Location Plan



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Making Sustainability Happen