



WINCHESTER LOCAL PLAN REGULATION 19 CONSULTATION

On behalf of Wates Development Ltd.

October 2024

Carter Jonas

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1.0 INTRODUCTION

- 1.1 Carter Jonas is instructed by Wates Development Ltd. ('Wates') to respond to the Winchester City Council ('the Council') Local Plan 2020-2040 ('the Local Plan') Regulation 19 consultation.
- 1.2 Wates controls Land to the rear of Thody's, New Farm Road, at the western edge of New Alresford ("the site" or "Land to the rear of Thody's"). The site is identified in the Strategic Housing & Economic Land Availability Assessment (SHELAA) (December 2021) as site reference NA01.
- 1.3 The SHELAA confirms that the site is 'deliverable' and 'developable' with only very limited environmental, historical, or physical constraints. Wates confirms that the site remains available for development. It is therefore considered wholly suitable for allocation through the Local Plan, or the subsequent Neighbourhood Development Plan.

Background

Wates Development Ltd.

- 1.4 Wates is an expert in land, planning and residential development throughout Southern England. The business focuses on securing land and delivering planning consents in sustainable locations, in areas of high demand.
- 1.5 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.

Site Context

- 1.6 Land to the rear of Thody's lies directly to the west of the built-up area of New Alresford. It is located to the west of New Farm Road between that road and the Fish Farm on the B3047 Alresford Road.
- 1.7 The site is approximately 4 hectares in extent and is currently largely in pastoral use, with some buildings at the north of the site, to enable access.
- 1.8 The site is bounded by hedges and some trees on all sides; to the west of the site is a farm access track, with a Fish Farm beyond. To the north, is another small pastoral field with residential properties beyond and to the east and south are residential properties.
- 1.9 The site is not constrained by any national or local landscape designations, with the South Downs National Park located to the south, on the southern side of the A31 Part of New Alresford is within a Conservation Area, although the field to the north of the site, the disused railway and, housing at De-Lucy Avenue separates the site from the southern boundary of this designation, and the majority of the heritage assets in the Conservation Area are further to the north east. As the SHELAA concludes, this is not a constraint to development on the site.
- 1.10 The River Itchen SSSI is approximately 80 metres to the southwest of the site, and the River Itchen SAC is about 225 metres to the west.
- 1.11 The site is a relatively small scale, enclosed, field with residential development adjacent to it. There are also the visual influences of the Fish Farm and various minor local roads. Beyond this, the site is inside a boundary set by the B3047 (Alresford) Road and the A31. The site represents a discrete and contained extension to the town.

1.12 There are a number of local services and amenities within walking/cycling distance of the site, which make it a sustainable location for new development. These existing services and facilities include:

- Convenience retail
- Post office
- Pubs / cafes / restaurants
- Health care including GP surgery / dentists / opticians
- Pre school / nursery
- Primary school
- Secondary school
- Library
- Bus stops
- Various employment opportunities
- Recreation Grounds
- Children's Play Areas
- Allotments

Development Benefits

1.13 The site has the potential to deliver approximately 75 homes including 40% (30) affordable homes. It would also include areas of open space including recreational space for the residents and children's play; have access to and promote sustainable and active travel opportunities for new and existing residents; and seek to provide improvements to the local footpath network increasing connectivity to local services and facilities and green infrastructure.

Deliverability

1.14 Wates confirms that the site is available for development, and no impediments to development are known. It is expected that development could be achievable in the next five years, but Wates is cognisant of the need, and value, of engaging with the local community in the early stages of planning development on the site.

2.0 GENERAL COMMENTS

2.1 Wates is of the opinion that the Local Plan is generally sound, having reviewed its contents and supporting documentation and evidence. There are, however, elements of the Plan that would benefit from some amendments so as to ensure that the Plan conforms to the national policy and that the policies are effective.

'Soundness'

- 2.2 It is understood during Regulation 19 stage of the Local Plan that (in accordance with Paragraph 35 of the National Planning Policy Framework) the Council is specifically seeking comments on whether the plan passes the legal test and is 'sound'. Plans are deemed 'sound' if they are:
- **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, where relevant.
- 2.3 Our representation hereunder is made with the above context in mind and will reference, where appropriate, where we consider the Local Plan does not meet these tests of soundness.

3.0 VISION FOR THE AREA

Strategic Policy SP1: Vision and Objectives

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 3.1 Wates welcomes the aims of policy SP1, and supports the Council in its vision to deliver high quality sustainable and inclusive development.
- 3.2 Wates is particularly pleased to note the reference to partnership working, which will be key if the overall quantum and scale of growth required by the area is to be achieved, especially if that scale is to increase under a new National Planning Policy Framework and as such may well require some flexibility and pragmatism from all parties.

Strategic Policy SP2: Spatial Strategy and Development Principles

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 3.3 Wates supports the Council’s overall spatial strategy and acknowledges that the most sustainable location for new development are likely to be those with the most services and facilities. The spatial strategy also recognises the need to support the more rural parts of the plan area, and the need to strike a balance between the social, economic, and environmental needs of the area.
- 3.4 However, and as is set out later in these submissions, the Council must be cognisant of forthcoming changes in national policy and must build in some flexibility to its overall strategy. It is likely that housing needs (and targets) will increase in the near future, so the Council should include a provision in its early strategic policies for an early plan review. Alternatively, the Council could consider ‘reserve’ sites, or commit to reviewing the development capacity at specific sites, and locations where more development might reasonably be achieved without additional harm (for example, by allocating Land to the rear of Thody’s).

4.0 CARBON NEUTRALITY AND DESIGNING FOR LOW CARBON INFRASTRUCTURE

Strategic Policy CN1: Mitigating and Adapting to Climate Change

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 4.1 Wates notes that Strategic Policy CN1 is a ‘gateway’ policy which is supported by later Development Management style (non-strategic) policies of the draft Local Plan. The approach of the Policy is generally sound, and it strikes the right balance between requiring planning applications to demonstrate certain matters and encouraging higher standards where possible.
- 4.2 The Council can, and should, support strategies which seek address climate change, and move away from fossil fuels towards innovative and renewable sources of power, but the influence of a Local Plan on such matters is limited to the local level. The challenge of the climate emergency and the need to reduce our carbon dependence is accepted by the Government.
- 4.3 Chapter 14 in the NPPF sets the policy aim of transitioning to a low carbon future. To meet the 2050 target, new homes are already being built to higher energy efficiency standards set out in the 2021 Building Regulations which will deliver a 30% improvement on previous regulations.
- 4.4 The policy runs the risk of becoming outdated as regulations, and national policy shifts, so its role must be kept under review. The Council will need to reflect its desire for partnership working, in this policy and use its agency to identify solutions to the challenges of climate change, and to support development opportunities where it can be demonstrated that climate change adaption and mitigation is being delivered.

Policy CN2: Energy Hierarchy

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

- 4.5 Wates understands the principles of proposed Policy CN2 but is unclear of its necessity as a standalone policy.

Necessary modification to the Policy

- 4.6 Delete the policy and include its wording in Strategic Policy CN1.

Policy CN3: Energy Efficiency Standards to Reduce Carbon Emissions

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

- 4.7 Wates acknowledges that in order to meet the Government’s aim of net zero emissions by 2050, there is a need to improve the environmental performance of new residential (but also non-residential) forms of construction. To reach these targets, there is clear benefit in standardising an approach to sustainable design and construction across the UK as part of a collective approach.
- 4.8 We expect further amendments to building regulations and the new Future Homes Standard to be implemented from 2025. These proposed changes will see new homes being built to standards that reduce CO2 emissions by 75% on current standards from 2025 onwards. Furthermore, Homes built under the Future Homes Standard will be ‘zero carbon ready’, which means that in the longer-term, no further retrofit work for energy efficiency will be necessary to enable them to become zero carbon homes as the electricity grid continues to decarbonise.
- 4.9 The Council will need to reflect on the role that building regulations play in the delivery of new development, and whilst national policy does not prevent local authorities from setting higher ambitions, the Plan is still required to demonstrate that its chosen strategy is deliverable and strikes the appropriate balance of social, economic and environment factors in the aim of achieving sustainable development.
- 4.10 Any deviation from national requirements should have been carefully considered in terms of its viability. As far as we can tell from reviewing the Local Plan Viability report, the assumptions regarding additional costs appear reasonable, but will have some effect on deliverability in the short term, and especially on the smaller sites. The Future Homes Hub estimates that the increase in build cost for a full ‘fabric first’ approach, compared with Part L 2021, is circa £19,200 (17%). Compared with the expected 2025 specification it is circa £13,500 (11%) more¹.

Necessary modification to the Policy

- 4.11 The Council will need to keep its viability work under review, to ensure it is robust. Wates recommends that the Council reviews the Future Homes Hub work on this matter: [Ready for Zero - Evidence to inform the 2025 Future Homes Standard -Task Group Report FINAL- 280223- MID RES.pdf \(cdn-website.com\)](#)
- 4.12 The policy will need to be clear that any requirements and encouragements regarding sustainable construction are subject to site specific viability assessments.
- 4.13 The Council will also need to carefully consider how it will monitor (and if necessary enforce) a policy which is directed towards attempting to regulate unregulated energy usage.

¹ [Ready for Zero - Evidence to inform the 2025 Future Homes Standard -Task Group Report FINAL- 280223- MID RES.pdf \(cdn-website.com\)](#)

Policy CN4: Water Efficiency Standards in New Developments

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

4.14 Wates understands the water management challenges in the area, and that the South East of England is a water stressed area. Targets of 110l per day, and 105l per day have been achieved in developments and as such the new target of 100l per day is ‘sound’ so long as it is approached in a collaborative way between applicants, the Council, and Southern Water. Punitive conditions should not be applied, to development consents, which could stifle development, rather a proactive and knowledge sharing approach should be sought which introduces new technologies in a phased manner.

Policy CN8: Embodied Carbon Assessment

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

4.15 Wates raises no objection with the principle of proposed Policy CN8, and it recognises the need to manage embodied carbons. However, it is likely that this will have a national standard in development techniques in the short to medium term. It is right that matters of this importance and national application are managed at a national level, but there is not any current national policy or guidance at this time, therefore its explicit inclusion in the Local Plan is questioned.

4.16 Wates welcomes the fact that there are no ‘targets’ introduced in the proposed policy, but it does question how the Council proposes to assess the feasibility of demolition or re-use of various buildings. Also, Wates suggests that the operational needs of buildings and businesses, should be considered more clearly in this policy, and if a building is no longer fit for its intended purpose, then this should weigh in favour of its removal.

5.0 HIGH QUALITY WELL-DESIGNED PLACES AND LIVING WELL

Strategic Policy D1: High Quality, Well Designed and Inclusive Places

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes

Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 5.1 Wates supports the principles set out in proposed Strategic Policy D1. The Council's approach to high quality, well designed, places chimes with Wates own approach to promoting sites for development.
- 5.2 Wates recognises the importance of quality design and place making, indeed the NPPF contains an entire chapter (12) on the subject. Paragraph 126 of the NPPF explains that:
- “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”*
- 5.3 Proposed Strategic Policy D1 follows the principles set out in the NPPF and adds some local context, it is therefore a ‘sound’ policy.
- 5.4 An element of design should continue to be reserved for Neighbourhood level and where positive and aiding in the delivery of development in the production of site-specific design codes. This is because design is often reflective of site-specific circumstances. As advocated by paragraph 129 of the NPPF, design codes can sometimes be prepared by landowners and developers.

Strategic Policy D2: Design Principles for Winchester Town

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

- 5.5 Wates is unclear of the specific value of proposed Policy D2. Whilst the intensions of the policy are clear, and Wates strongly supports well designed new places, the need to have a set of development management policies which follow proposed Strategic Policy D1, is not justified.
- 5.6 Proposed policies D2, D3 and D4 all follow a similar structure which all relate back to proposed Strategic Policy D1. There is little additional detail, and no more direct guidance for the decision maker in the non-strategic policies, and in essence each policy is setting out that design should respond to its surrounds and context. Having additional repetitive policies is unhelpful for effective and efficient decision making.

Necessary modification to the Policy

- 5.7 Delete the policy and include its wording in Strategic Policy D1.

6.0 SUSTAINABLE TRANSPORT AND ACTIVE TRAVEL

Strategic Policy T1: Sustainable and Active Transport and Travel

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 6.1 Wates broadly supports this policy.
- 6.2 The policy for sustainable travel and connectivity, should refer to the overall spatial strategy which includes both locating and promoting development that can reduce the need to travel and promote a genuine choice of transport modes, whilst also investing appropriately in supporting infrastructure.
- 6.3 Wates considers that a successful strategy of co-locating new homes and jobs can make a significant contribution to producing a sustainable and active transport network, reducing the need to travel long distances (and promoting the idea of a 20-minute neighbourhood).
- 6.4 Whilst reducing the need to travel by vehicle makes a significant contribution to creating an active transport network, the Local Plan will need to take account of the comparatively poorer transport connections in the more rural areas of Winchester – as recognised by paragraph 105 of the NPPF.
- 6.5 Accordingly, a key part of transitioning towards a sustainable transport network, whilst maintaining sustainable growth, is locating development adjacent to existing or proposed major routes that can accommodate sustainable forms of travel – including cycle lanes, bus routes or by train and where possible, co-locating major housing and employment-generating development.
- 6.6 The spatial strategy in the Local Plan supports active travel, and Wates is committed to supporting active travel choices on sites which it promotes.

Policy T3: Enabling Sustainable Travel Modes of Transport and the Design and Layout of Parking for New Developments

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 6.7 Wates supports this policy, and it chimes with its own design and layout philosophies. The ‘hierarchy’ of streets is a well understood principle, and developers / developments are becoming better at providing for active travel and promoting pedestrian and cycle safety.
- 6.8 The need to promote public transport options as early as possible in new developments is also understood and supported.

7.0 BIODIVERSITY AND THE NATURAL ENVIRONMENT

Policy NE3: Open Space, Sport and Recreation

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 7.1 Wates recognises and supports the inclusion of policy guidance on the amount of open space, and sports/recreation facilities with new development.
- 7.2 Wates notes that the tables set out in support of proposed Policy NE3 are very similar to those of the extant plan, and Policy CP7. This policy is well understood and had been delivered in development across Winchester.
- 7.3 Land to the rear of Thody's has capacity to deliver the open space guidance, even with more houses being included, when development is consented.

Policy NE5: Biodiversity

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 7.4 The concept of Biodiversity Net Gain (BNG) is becoming better understood and since the enactment of the Environment Act 2021, most developments are attuned to demonstrating a 10% net gain as required by that Act from 2024.
- 7.5 This does not mean that the Plan should not seek to encourage developments to secure BNG in excess of the 10% set in the Environmental Act – which of course will be the legal minimum. However, accordingly, any encouragement to demonstrate a net gain in excess of 10% should be subject to a viability assessment. For guidance purposes, biodiversity units generally cost £25,000-£35,000 but the number of dwellings these cater for is very scheme dependent. Government credits are much more expensive again.
- 7.6 Moreover, this cost, along with others concerning sustainable design will need to be monitored on a site-by-site basis to ensure the Council's overall strategy remains deliverable across the plan period. The Council may need to be open to negotiation on such matters to ensure its strategy is delivered.

- 7.7 PPG Paragraph 022 (Reference ID: 8-022-20190721) advises that biodiversity net gain can be achieved on-site, off-site or through a combination of both on-site and off-site measures. National guidance does not explicitly state the percentage split between such provision, but Paragraph 023 (Reference ID: 8-023-20190721) confirms that such gains can be delivered entirely on-site or by using off-site gains where necessary.
- 7.8 Land to the rear of Thody's will be able to demonstrate an appropriate net gain in biodiversity.

Policy NE11: Open Space Provision for New Developments

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

- 7.9 Wates understands the principles of proposed Policy NE11 but is unclear of its necessity as a standalone policy.

Necessary modification to the Policy

- 7.10 Delete the policy and include its wording in Strategic Policy NE3.

8.0 HOMES FOR ALL

Strategic Policy H1: Housing Provision

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

- 8.1 Wates is broadly supportive of the housing requirements set out under Strategic Policy H1, including the provision of a buffer to accommodate the needs from the neighbouring authorities. However, it is not clear how this approach to identifying need complies with the guidance for calculating housing needs. The basis for calculating need is to use the submission year of the plan as the starting point and to calculate need and a trajectory forward over the plan period. Previous targets and delivery performance, under current policy and guidance is not necessarily relevant, other than to provide context.
- 8.2 Winchester Strategic Housing Market Assessment Update ('SHMA') (published in July 2024) supports the case for the housing requirement, as set out in Policy H1, to be retained or potentially increased and the case for proposed allocations to be retained.
- 8.3 The SHMA highlights that the housing delivery rates over the last five years have significantly exceeded the Local Plan average requirement of 625 dwellings per annum. However, it is also noted that while affordable housing delivery has significantly improved, there does not appear to have been an immediate, or significant, impact on improving market affordability in Winchester District.
- 8.4 The need to maintain the housing delivery rates and increase the delivery of affordable housing is identified in the SHMA.
- 8.5 The urgent need for housing is brought into sharp focus with Secretary of State's written ministerial statement entitled "Building the homes we need" ('WMS') which sets out the measures to address the housing crisis. It should also be noted that the WMS has material weight.
- 8.6 At the time of drafting this representation, the Government has signalled its firm intention to revise the National Planning Policy Framework ('Framework') in relation to housing land supply and delivery and to this end the Government has published a draft revised Framework (dated 30th July 2024) which is was subject to an eight week period of consultation up to 24th September.
- 8.7 Part of the Government's proposed changes include the revisions to the way the housing need is calculated through the introduction of revisions to the Standard Method of calculating the need. If the proposed method for calculating housing need is implemented, as currently proposed, the annualised housing target for Winchester would **increase from 676 dwellings per annum to 1099 dwellings per annum.**
- 8.8 At the heart of the draft guidance is the continued support for sustainable development in locations which are accessible and well served by social infrastructure. Moreover, the draft Framework signals the determination to boost deliverable housing land supply with a revised standard methodology for calculating housing need and a return to mandatory housing targets.
- 8.9 The draft Framework shows the likely direction of travel for Government policy relating to development growth and infrastructure provision, application determination, and plan-making in England. If the

revised standard method is adopted, this could result in significant uplift in the annualised housing requirement in Winchester District.

Necessary modification to the Policy

- 8.10 Given the growing mandate for the standard method to be used as the basis for determining local authorities’ housing requirements in all circumstances, the Council must commit to an early review of the Local Plan to enable sufficient housing to come forward to meet local targets.
- 8.11 There are sites, such as Land to the rear of Thody's, which could be allocated to provide a buffer to meet the expected rise in housing targets.

Strategic Policy H2: Housing Phasing and Supply

Legally compliant	No	Positively prepared	No
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

- 8.12 Wates is concerned that draft Policy H2 fails to present a positive response to the urgent need for housing in England and limits the opportunity to boost the housing land supply in the District.
- 8.13 Furthermore, it is noted that the draft policy is inconsistent with Paragraph 60 of the NPPF which states that:

*“To support the Government’s objective of significantly boosting the supply homes, it is important that a **sufficient amount and variety of land** can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.” (our emphasis)*

- 8.14 Section 6 of the Housing Topic Paper (July 2024), published in support of the emerging Local Plan, sets out the detailed justification for the phasing policy and how it intends to operate. The reasons sets out by the Council are summarised below:
 - Given the high level of commitments and existing Local Plan allocations, the only realistic ‘lever’ available to promote more housing in the later part of the Plan period, so as to level out housing delivery, is to use phasing to hold back new Local Plan allocations.
 - A large part of the housing commitments are greenfield sites of various types and sizes, as illustrated by the AMR information on housing commitments and recent brownfield / greenfield development. Reflecting on the emphasis on prioritising brownfield sites, the Regulation 18 Plan sought to hold back new greenfield allocations
 - Phasing new greenfield sites to hold them back until after 2030 coincides with Government requirements for water companies to reduce nutrient discharges (which is a constraint and cost within Winchester District).
 - It has become evident that the capacity of the Scottish and Southern Electricity Networks (SSEN) electricity grid poses a potential issue. Planning for long-term infrastructure needs is important to ensure that the community is resilient to future challenges and capable of accommodating growth without compromising quality of life.

- 8.15 Against the above points, Wates is of the following view:

- The Council’s attempt to create an artificial housing trajectory in order to ‘level out housing delivery’ fails to account for the variable nature of the housing market in the District. In the absence of a buoyant market, there is a risk of insufficient completions being achieved in the plan period. This in turn is likely to increase the affordability ratio in the District. Furthermore, the proposed policy does not account for site-specific circumstances which change over time and makes the phasing strategy less robust.
- As set out in the WMS, brownfield development alone will not be enough to meet the existing unmet housing and commercial needs. The proposed principle of prioritising the delivery of development on brownfield sites during the early phases of the plan period is likely to deter and delay sustainable development in the District. It is considered that the most strategic way to meet the housing demands of the District is to undertake a ‘housing first approach’, where high quality housing in available and deliverable locations are encouraged. Furthermore, brownfield redevelopment is expensive and can lead to viability challenges, where the Council will have to inevitably make concessions on matters such as affordable housing provision or other infrastructure impacts.
- The proposed upgrades to wastewater treatment works presents only part of the solution in reducing nutrient discharge. To drive forward nutrient neutrality in the District, localised mitigation solution must be encouraged to create wider sustainability benefits.
- The concerns cited with regard to the capacity of the electricity grid should not be presented as a barrier in the delivery of homes on allocated greenfield sites. A balanced approach should be undertaken to overcome the competing crisis of housing and energy. The Government has been steering reforms to address the energy crisis with the Connections Actions Plan being published at the end of 2023 outlining the need slim down queue of viable progressing projects aligned to the country’s strategic need. The Council must engage with energy providers and regulators and seek to secure wider and coordinated enabling works instead of delaying the vital delivery of homes.

8.16 Council’s proposed phasing to new greenfield housing sites allocated in the emerging Plan is contrary to the NPPF and will likely create a barrier in sufficient amount and variety of land to come forward and meet the critical need for housing.

Necessary modification to the Policy

8.17 As set out above, it is considered that draft Policy H2 does not meet the test of soundness and is in direct conflict with the Government’s ambition to boost the supply of homes as set out the WMS and draft NPPF. Therefore, it is recommended the draft Policy is removed from the emerging Local Plan.

Strategic Policy H3: Spatial Housing Distribution

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

8.18 Wates broadly supports the spatial strategy, as set out in these submissions, but believes that there is clearly greater capacity for development in Winchester District.

Necessary modification to the Policy

8.19 The Council should, in light of the increased housing needs identified in these submissions, and foreshadowed in the WMS, adjust the housing targets and distribution in proposed Strategy Policy H3.

8.20 Land to the rear of Thody's should be allocated for development.

Policy H5: Meeting Housing Needs

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

8.21 Wates notes that 'needs' work which underpins this policy as presented in "*Winchester Strategic Housing Market Assessment (SHMA)*," and supports the delivery of homes for all parts of the community.

8.22 We note the need for accessible and adaptable homes and confirm that these can be provided at Land to the rear of Thody's.

8.23 The Policy is 'sound,' but as with other proposed non-strategic policies of the Local Plan the Council will need to ensure its application is cautious to ensure it does not create an undue burden on the providers of accommodation for older people, to ensure timely delivery.

Policy H6: Affordable Housing

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

8.24 Wates notes that 'needs' work which underpins this policy as presented in "*Winchester Strategic Housing Market Assessment and 2024 Update*," and supports the delivery of homes for people who cannot access the housing market.

8.25 The Local Plan viability work suggests that the provision of Affordable Housing at 40% of residential development is achievable, and therefore Wates supports this too. The caveats around previously developed land, and the need to mitigate the impact of additional phosphates on the River Itchen SAC are also noted.

- 8.26 Wates expects that Land to the rear of Thody's can provide up to 40% affordable homes. Affordable housing will be evenly distributed within the site and designed to a high quality, so as to be indistinguishable from other development. The delivery of affordable housing, including mix and tenure, will be secured through a s106 agreement.

9.0 Market Towns: New Alresford

- 9.1 The Local Plan's spatial strategy must allow housing on the edge of sustainable settlements in the district on a proportionate basis, to ensure the local services and facilities are maintained and to improve levels of affordability at Market Towns in the more rural areas. This should include allocating Wates's land interests at New Alresford for about 75 new homes.
- 9.2 It is important to allocate a range of housing sites, including small and medium sized developments, to ensure that the supply and delivery of new homes can be maintained throughout the plan period. This will ensure the timely delivery of new housing and will enable a mixture of sites to come forward to meet housing requirements across the entire Plan period.
- 9.3 Wates considers that the allocation of Land to the rear of Thody's is reasonable and should be considered as part of the Council's Local Plan as it would help ensure a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability, in accordance with Paragraph 70 of the NPPF:

"...authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability."

- 9.4 Wates also notes that there is an emerging Neighbourhood Development Plan (NDP) in New Alresford, and this is referenced in the emerging Local Plan. We consider that it could be appropriate to allocate Land to the rear of Thody's in a NDP, subsequent to the Local Plan, but the Council will need to be confident that the NDP will be completed in a timely fashion to support the housing land supply and "mix of sites" across the district.

New Alresford

- 9.5 Wates is pleased to note that New Alresford is identified as a Market Town in the Local Plan. Market Towns are settlements with a good level of services and facilities, which gain a 'score' of 30 or more in the Council's settlement assessment work. Market Towns are therefore rightly considered to be sustainable locations for new development.
- 9.6 Wates is pleased to read paragraph 14.28 of the Local Plan, which recognises the potential for growth at New Alresford:

It is expected that there is capacity for the development of about 610 dwellings in New Alresford

- 9.7 Wates is however, somewhat concerned at the somewhat arbitrary nature of the figure of 610, and that this is not fully justified in evidence, instead it is a reflection of completion in recent times. Wates further notes that the proposal in the Local Plan is to rely on – and 'roll forward' – allocations for the extant Winchester Plan. Whilst this is can be an appropriate strategy, the Council will need to demonstrate that these sites are deliverable in the plan period and has confidence that their continued allocation is suitable.

Policy NA3: Neighbourhood Plan Designated Area

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

- 9.8 It is noted that it is proposed to rely on additional site allocations in the Neighbourhood Development Plan (NDP). This can be an appropriate way to manage the allocation of development sites, and Wates will be continuing their ongoing engagement with the Town Council.
- 9.9 However, the Council will need to be confident that it has sufficient sites allocated in the Local Plan to meet needs and to provide a rolling five-year supply of deliverable sites. Should there be any uncertainty about the deliverability of sites proposed in the Local Plan, then alternatives – such as Land to the rear of Thody's – could be allocated, or at least allocated as a reserve site.

Necessary modification to the Policy

- 9.10 The Council should consider a fall-back position in the event that NDP do not come forward in an appropriate and timely manner. This should involve the identification of reserve development sites.

Settlement boundaries

- 9.11 Wates' opinion is that settlement boundaries are an arbitrary and blunt instrument, which do not have regard to the contribution that some open spaces within settlements make to the character and appearance of those settlements. In terms of impact on amenity and the local landscape it might be preferable to locate new homes in edge of village locations which technically, might sit outside the arbitrary boundaries. It is therefore suggested that the philosophy and operation of settlement boundaries is carefully considered in the Council's final drafting exercises before the Local Plan is published to ensure that they are still generally fit for purpose. Wates submits that the Councils will need to reflect on the operation of settlement boundaries and how they comply with the Planning Practice Guidance as follows:

“The nature of rural housing needs can be reflected in the spatial strategy set out in relevant policies, including in the housing requirement figures for any designated rural areas. A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness.”

Paragraph: 009 Reference ID: 67-009-20190722

10.0 Omission site: Land to the rear of Thody's, New Farm Road, New Alresford.

- 10.1 As is set out at the beginning of these submissions Wates is of the firm view that Land to the rear of Thody's, New Farm Road is a suitable, sustainable, and deliverable site for residential development.
- 10.2 Wates' opinion of the site is supported by the assessment of the site in the Strategic Housing & Economic Land Availability Assessment (SHELAA). Under reference NA01 where the conclusion is that:
- "The site is deemed as deliverable/developable."*
- 10.3 Wates' notes that the majority of environmental constraints, historical constraints, policy constraints and physical constraints are 'scored' as a 'green' in the SHELAA assessment. This effectively means there are only very limited negative effects identified.
- 10.4 The only 'amber' concerns are about: Tree Preservation Orders; the site's countryside location (outside the settlement boundary); a Waste Consultation Zone; archaeology and access (all matters that can be managed and mitigated through development).
- 10.5 On the face of the SHELAA assessment — there are no impediments to development of the site.

Integrated Impact Assessment (IIA)

- 10.6 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.
- 10.7 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.
- 10.8 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.
- 10.9 IIA2: travel and air quality: As a more rural development option than at Winchester for example, development at New Alresford is unlikely to achieve a strong positive score for 'travel,' but there is a significant range of services and facilities in the town, and access to these is achievable by sustainable methods. The Council could consider a weighted response to this criterion, which places sites at Market Towns in a different assessment to those close to urban centres, because the need for homes will not be met all at the edge of urban areas, and there is a need to support local town and village communities – their social needs, and the continued viability of rural businesses – which should be balanced with the need to travel.

- 10.10 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.
- 10.11 IIA7: services and facilities: It is disappointing to see a 'minor negative' assessment for this criterion. Whilst New Alresford is not a major urban centre, like Winchester, it is a 'second tier' market town with a good level of services and facilities. 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 town and village locations which support local community facilities to maintain vitality.
- 10.12 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 development in more rural locations, including market towns – as recognised in the NPPF – is to support the local, and rural economy, and smaller town centres. This is to support smaller local 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 more rural areas.
- 10.13 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, because it is confident that biodiversity will be managed, and a net gain achieved, in any development.
- 10.14 IIA10: landscape: Wates questions an assessment of the site which concludes that it has a medium or higher overall landscape sensitivity. The site is relatively discrete and limited in scale, and cannot be seen from many public viewpoints. The site lies adjacent to existing residential development. The site is also enclosed by hedges, roads, and slightly further out by the B3047 (Alresford) Road and the A31. Wates is confident that a full landscaping scheme that supports the site's development can be created to manage and mitigate any residual effects.
- 10.15 IIA11: historic environment: Wates agrees with the 'negligible' assessment here, as no heritage assets will be significantly affected.
- 10.16 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 seeks clarification regarding minerals safeguarding on the site. Given the need for greenfield development across the district it is also likely that some agricultural land will be lost, so this should not be seen as a total impediment to development.
- 10.17 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.
- 10.18 IIA14: flood risk: Wates agrees with the 'negligible' assessment here, as the site is almost entirely in Flood Zone 1.
- 10.19 Having reviewed the IIA; Land to the rear of Thody's would appear to be appropriate to allocate for development. None of the constraints to development are insurmountable, and in fact, much of the assessment supports the sites as suitable and sustainable for development. It is respectfully requested, therefore, that it is allocated in the Local Plan.

11.0 CONCLUSION

- 11.1 Wates is pleased to have had the opportunity to comment on the emerging Local Plan and is heartened to see such an advanced draft. There are some matters of detail, touched upon in these submissions that make the Local Plan unsound, and critically, Wates requests that an additional site allocation is made at New Alresford. Nonetheless, the Wates will also continue to engage with the Town Council regarding its Neighbourhood Development Plan and seek the allocation of its site here too.
- 11.2 Land to the rear of Thody's, New Farm Road is considered to be a sustainable location for new development (as set out above) as part of a sustainable new residential development. The site has the potential to deliver about 75 homes, which would make a significant contribution to the viability and vitality of New Alresford.
- 11.3 The site is well related to the town of New Alresford and would constitute sustainable development in accordance with the NPPF's presumption in favour of sustainable development.
- 11.4 In summary, based upon the identified opportunities and constraints set out in these submissions; the site has the potential to deliver approximately 75 homes including 40% (30) affordable homes. It would also include areas of open space including recreational space for the residents and children's play; have access to and promote sustainable and active travel opportunities for new and existing residents; and seek to provide improvements to the local footpath network increasing connectivity to local services and facilities and green infrastructure.
- 11.5 Overall, in planning to meet the future objectively assessed housing development needs of Winchester to 2040, the Council should recognise the merits of the potential for sustainable, residential-led development at the site on the edge of New Alresford, for the reasons set out above.

12.0 PARTICIPATION AT THE ORAL PART OF THE EXAMINATION

- 12.1 Carter Jonas, on behalf of Wates, confirms that it does wish to take part in the oral part of the Local Plan examination. This is to be able to fully explain the concerns about the policy drafting and to answer questions that the Inspector might have.

