



**EXAMINATION OF THE
WINCHESTER
DISTRICT LOCAL
PLAN 2020-2040**

**MATTER 8:
DEVELOPMENT
ALLOCATIONS THE
MARKET TOWNS AND
RURAL AREAS
(MTRAS)**

NEW ALRESFORD

**POLICY NA3
NEIGHBOURHOOD
PLAN DESIGNATION
AREA**

On behalf of Wates Developments Ltd.

April 2025

Carter Jonas

CONTENTS

1.0 INTRODUCTION	3
Background	3

2.0 ISSUE: WHETHER THE PROPOSED HOUSING SITE ALLOCATIONS IN MTRAS WOULD BE JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY.	5
New Alresford	5
Policy NA3 Neighbourhood Plan Designation Area	5

3.0 OMISSION SITE: LAND TO THE REAR OF THODYS, NEW FARM ROAD, NEW ALRESFORD.	7
Integrated Impact Assessment (IIA)	7

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 to the rear of Thodys, New Farm Road, at the western edge of New Alresford ("the site" or "Land to the rear of Thodys")
- 1.3 Wates controls the site is identified in the Strategic Housing & Economic Land Availability Assessment (SHELAA) (December 2021) as site reference NA01.
- 1.4 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.
- 1.5 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.
- 1.6 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.
- 1.7 In this submission, Wates sets out its responses to Matter 8: Development Allocations the Market Towns and Rural Areas (MTRAs).
- 1.8 This statement should be read in combination with Wates' responses to the Inspector's others Matters,

Background

Wates Development Ltd.

- 1.9 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.
- 1.10 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

- 1.11 Land to the rear of Thodys 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.
- 1.12 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.
- 1.13 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.

- 1.14 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.
- 1.15 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.
- 1.16 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.
- 1.17 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

- 1.18 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

- 1.19 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 ISSUE: WHETHER THE PROPOSED HOUSING SITE ALLOCATIONS IN MTRAS WOULD BE JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY.

New Alresford

Policy NA3 Neighbourhood Plan Designation Area

1. What is the evidence to justify an approach to designate an additional site/sites in the Neighbourhood Plan?

- 2.1 Wates has explained in response to Matter 5 that the Council's SHELAA, IIA and IDP have collectively demonstrated that there is additional capacity for development in New Alresford. Wates site investigations, and vision for Land to the rear of Thodys, as set out in these submissions supports this additional capacity and demonstrates that the site is a sustainable and deliverable location for around 75 new homes.

2. When is the Neighbourhood Plan expected to be 'made'? What is the evidence that it will come forward in an appropriate and timely manner?

- 2.2 Wates is engaging with the New Alresford Neighbourhood Development Plan when and where it can. Wates' understanding is that following the review, a draft Neighbourhood Development Plan will be prepared by the Parish Council along with a supporting evidence base.
- 2.3 Wates is expecting the Reg. 14 consultation to take place later this year, with the Reg. 16 consultation, and examination thereafter.
- 2.4 On this basis, the earliest that the Neighbourhood Development Plan will be adopted is likely to be 2026, although there is still some significant uncertainty in this timeframe.

3. What is the evidence that there are suitable sites available for designation? Would this approach provide the necessary certainty for the development plan process? In taking this approach would the Plan accord with a Plan led approach?

- 2.5 Wates is firm in its view that Land to the rear of Thodys is a suitable, and deliverable, development site. This is set out at the beginning of these submissions and at Appendix A.
- 2.6 Wates is content to follow the Neighbourhood Development Plan process, but suggests that the scale of housing need in Winchester and to provide certainty in meeting those needs, Land to the rear of Thodys should be allocated for development in the Local Plan – or at least indicated as a development location, for further detail to be identified in a site allocation policy in the Neighbourhood Development Plan.

4. If the Neighbourhood Plan was not made in a timely manner, how would the housing shortfall be made up?

- 2.7 Should the Neighbourhood Development Plan not reach its Reg. 16 consultation by early 2026, with the intention for it to be made no later than mid 2026 then it would be reasonable for the Council to 'step in.'
- 2.8 Wates suggests that sites could be identified in the Local Plan as 'broad locations for development' that are given site allocation policies in the Neighbourhood Development Plan, and if the Neighbourhood Development Plan stalls these 'broad locations for development' can be considered as reserve sites

where the principle of development is acceptable, and an application would be in conformity with the development plan.

- 2.9 It is accepted that 'broad locations for development' are most often considered for large scale sites, and should the approach not be considered appropriate for the Neighbourhood Plan areas, then the alternative is for the Council to commit to a site allocations Development Plan Document which identifies sites where Neighbourhood Plans have not come forward in a timely manner. Any site allocations DPD must be prepared in the most efficient way, however, to maintain a properly plan led system, which is not over taken by speculative planning appeals.
- 2.10 In summary, Wates is firmly of the view that Land to the rear of Thodys should, in order of preference, be:
- (a) allocated (or at least identified as a preferred location for development) in this Local Plan; or
 - (b) allocated in the New Alresford Neighbourhood Development Plan; or
 - (c) allocated in a subsequent site allocations DPD.

5. Should policy NA3 address off site infrastructure needs? Would it be necessary for the purposes of soundness to address the requirement to liaise with water and waste water providers?

- 2.11 It is not necessary for policy NA3 to address off site infrastructure needs as this matter can be managed through the development management process, and through S106 agreements / CIL.

6. Would the phasing of development until 2030 be justified by the evidence?

- 2.1 No. As Wates sets out in response to this issue, under Matter 4, the arbitrary 'phasing' of development is completely unjustified, and unsound. This approach fails to present a positive response to the urgent need for housing in England and limits the opportunity to boost housing land supply.
- 2.12 Phasing in this way is contrary to national planning policy, in particular at Paragraph 60 of the Framework.

3.0 Omission site: Land to the rear of Thodys, New Farm Road, New Alresford.

- 3.1 As is set out at the beginning of these submissions, and in the presentation material at **Appendix A**, Wates is of the firm view that Land to the rear of Thodys, New Farm Road is a suitable, sustainable, and deliverable site for residential development.
- 3.2 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."*
- 3.3 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.
- 3.4 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).
- 3.5 On the face of the SHELAA assessment — there are no impediments to development of the site.

Integrated Impact Assessment (IIA)

- 3.6 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.
- 3.7 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.
- 3.8 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.
- 3.9 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.

- 3.10 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.
- 3.11 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.
- 3.12 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.
- 3.13 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.
- 3.14 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.
- 3.15 IIA11: historic environment: Wates agrees with the 'negligible' assessment here, as no heritage assets will be significantly affected.
- 3.16 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.
- 3.17 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.
- 3.18 IIA14: flood risk: Wates agrees with the 'negligible' assessment here, as the site is almost entirely in Flood Zone 1.
- 3.19 Having reviewed the IIA; Land to the rear of Thodys 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 site as suitable and sustainable for development. It is respectfully requested, therefore, that it is allocated in the Local Plan.