



WINCHESTER LOCAL PLAN REGULATION 19 CONSULTATION

On behalf of Wates Developments Ltd.

October 2024

Carter Jonas

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APPENDIX A – VISION DOCUMENT

APPENDIX B – PUDDING FARM GAP REVIEW

1.0 INTRODUCTION

- 1.1 Carter Jonas is instructed by Wates Developments 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 on the northern edge of Winchester, ('the site' or 'Pudding Farm'). 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.
- 1.3 A comprehensive Vision Document for the site can be found at **Appendix A** of these submissions.

Background

Wates Developments Ltd.

- 1.4 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.
- 1.5 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 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.
- 1.7 The Land at Pudding Farm extends to some 18.7 hectares in total and is split into four arable fields.
- 1.8 Barton Farm Cottages are located on Worthy Road, outside of the site boundary.
- 1.9 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.
- 1.10 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.

Site Vision and Development Benefits

- 1.11 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.

- 1.12 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

- 1.13 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

- 1.14 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

- 1.15 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 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 should 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 at Pudding Farm).

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.

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

- 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.

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.

5.5 The Vision Document for Land at Pudding Farm shows how a well set out and accessible development could be achieved. The development would be sustainable and inclusive, and this could be achieved with a greater site capacity of around 120 new dwellings.

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

5.6 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.

- 5.7 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

- 5.8 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 at Pudding Farm has capacity to exceed 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 at Pudding Farm will be able to demonstrate an appropriate net gain in biodiversity.

Policy NE7: Settlement Gaps

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

- 7.9 Wates understands the principle of Strategic Gaps and acknowledges the role that they play in preventing the coalescence of settlements. However, these Gaps risk becoming too much of a restriction to development. Typically, the purpose of having a ‘gap’ is to ensure that settlements are physically separated, and each retains its own character and identity. This is achieved through:
 - Conserving the countryside between settlements
 - Maintaining the open (undeveloped) character
 - Recognising the distinctive character of the settlements and their setting.
- 7.10 Wates suggests that Land at Pudding Farm could be removed from the Winchester – Kings Worthy/ Headbourne Worthy Gap, without it having any material effect on the role of the Gap. Please see Pudding Farm Gap Review at **Appendix B** of this report.
- 7.11 Land at Pudding Farm is located on the Winchester settlement edge. Bringing forward the site for residential development would not result in the coalescence of settlements, and subject to careful masterplanning and landscape mitigation, would not compromise the perception of the gap between the settlements.

- 7.12 When the land at Pudding Farm is brought forward for development, it will deliver significant landscaping benefits. These benefits include accessible green space, which could be delivered alongside development at the edge of Winchester, plus improvements such as better accessibility to the surrounding landscape, longer-range foot and cycle paths, biodiversity, landscape and environmental enhancements, and improved management opportunities.

Necessary modification to the Policy

- 7.13 The Council should review the general extent of its proposed “Settlement Gaps” to ensure that they are performing only a landscape function and are not an unjustified Green Belt (by another name). Specifically, Wates strongly believes that Land at Pudding Farm should be removed from the Winchester – Kings Worthy/ Headbourne Worthy Gap, without it having any material effect on the role of the Gap, to allow for its allocation as a development site.

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

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

Necessary modification to the Policy

- 7.15 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 at Pudding Farm, 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.

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 at Pudding Farm 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 at Pudding Farm.

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 at Pudding Farm can provide up to 40% affordable homes including 35% as low cost home ownership, and 65% as Social Rent or Affordable Rent. 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 Omission site: Pudding Farm, Worthy Road

Winchester

- 9.1 Wates supports the vision for Winchester as set out in paragraphs 12.1 – 12.2:

The area referred to by the city council as Winchester Town consists of the Winchester Wards plus the adjoining built up areas of Badger Farm, Oliver's Battery and Harestock, as defined on the Policies Map. It is compact, vibrant, distinctive, and located within a remarkable natural setting. It has played an important role over the centuries as a seat of political and religious power, and it is still a major centre of civil government, the law and the military. The Cathedral, the College and the Universities are also great Winchester institutions. The town has a thriving cultural life with museums, galleries, many fine art installations and live performances occurring throughout the year.

The unique characteristics of Winchester Town include historic and cultural assets of exceptional quality. The town is set in some of the most beautiful landscape in the country, and is connected both physically and visually to the surrounding countryside and the South Downs National Park. The river Itchen flows through the heart of Winchester, with its tranquil water meadows reaching right into the town itself.

- 9.2 Wates, however, firmly believes that Winchester has a greater capacity for development than is presented in the Local Plan, not least if Pudding Farm is included as an allocation. This would reflect the proposed allocations W2 – Sir John Moore Barracks and W4 - Land West of Courtenay Road, which are both in 'strategic gaps' but these gaps do not outweigh the need for new homes.
- 9.3 Increasing allocations at Winchester could go some way to meeting the potential under supply identified in these submissions. Wates also notes that central Winchester brownfield sites have a long history of non-delivery, therefore more greenfield sites will be needed to bolster delivery: All of which would help to ensure development is delivered in the most sustainable locations.
- 9.4 Wates also believes that its vision for Pudding Farm aligns with the Council's aspirations for Winchester. As is set out in the Vision Document, the site can provide housing, as a scale that provides for some local needs, but can deliver quickly and critically, the housing can be provided alongside significant areas of open space that will preserve the urban edge of Winchester and avoid merging into any surrounding settlements. Being specific about the justification of 'green gaps', their function and quality is necessary in policy and can be enshrined through a site-specific allocation which delivers specifically protected open space – rather than a potential arbitrary open space or settlement boundary.

Pudding Farm, Worthy Road.

- 9.5 As is set out at the beginning of these submissions – and in the accompanying Vision Document (**Appendix A**) – Wates can demonstrate that Pudding Farm, Worthy Road is a suitable, sustainable, and deliverable site for residential development.
- 9.6 Wates' opinion of the site is supported by the assessment of the site in the Strategic Housing & Economic Land Availability Assessment (SHELAA). Under reference HW03 where the conclusion is that:

"The site is deemed as deliverable/developable."

- 9.7 Wates' notes that environmental constraints and historical constraints, are all 'scored' as a 'green' in the SHELAA assessment. However, a limited number of physical and other constraints are identified: including: 'countryside,' 'settlement gap,' 'minerals safeguarding,' 'Flood Zones,' 'archaeology,' 'accessibility,' and, 'landscape.' All of these matters can be managed and mitigated through development.
- 9.8 Specifically, Wates can demonstrate that there is no risk from flooding to the developable area of its proposals, and that the gap between Winchester and Headbourne Worthy will be protected by the inclusion of significant open space, landscaping and country park.
- 9.9 At **Appendix B** is an assessment which shows that by applying the 'Eastleigh criteria' it is clear that development of land at Pudding Farm, in the form illustrated in the Vision Document, would not undermine the function of the gap, and would retain the separate identities of Kings Worthy and Winchester. The proposed residential development at Pudding Farm would thus comply with the requirements of draft policy NE7 (notwithstanding the concerns raised against that policy in these submissions).
- 9.10 On the face of the SHELAA assessment – and Wates' Vision Document – there are no impediments to development of the site.

Justification for development of the site

- 9.11 There are no known constraints which would prevent development in this location. The site is well related to Winchester and would constitute sustainable development in an area where there is an identified local housing need.
- 9.12 Sustainable Development
- a. Wates is committed to integrating the principle of Carbon Neutrality into the scheme and welcome discussions with the Council in order to maximise these opportunities.
 - b. The site is located in close proximity to a number of local services and facilities and the proposed development could support local vitality.
 - c. This site benefits from the employment opportunities in Winchester,
 - d. The site will reduce operational energy use by incorporating renewable energy supply in the solar park, but also including other features such as photovoltaic (solar) panels on the dwellings which is a known aspiration of the Council.
 - e. The site offers several other opportunities to promote sustainable travel for the future occupants of new homes at Winchester, as set out below.
 - f. The site will deliver a Biodiversity Net-gain and is nutrient neutral.
 - g. The delivery of a new country park
 - h. Improvements to the local footpath network increasing connectivity to local shops and green infrastructure.
 - i. Financial contributions to improve the existing public transport service.
- 9.13 Sustainable Travel
- a. **Pedestrian and Cycle Connectivity:** The site is well connected to existing and future pedestrian and cycle connections, and its location means much of the City is within a reasonable walking and cycling distance of the site. The city centre can be reached in a pleasant 20-25 minute walk, or a short 6-7 minute cycle ride.

- b. **Public Transport:** Excellent existing bus services are available along Worthy Road with bus stops adjacent to the site boundary providing access to bus services 67 and The Spring. The Spring service provides a frequent and attractive everyday connection for travel to Winchester City Centre (a journey of 5-10 minutes). Service 67 provides a route to destinations further afield including New Alresford and Petersfield, as well as Winchester City Centre. A range of further onward services are also available from Winchester City Centre.
- c. Winchester Railway Station is located 1.9km from the centre of the site and provides the opportunity for travel destinations further afield including London, Southampton, Basingstoke, Portsmouth and Bournemouth.
- d. The site offers several other opportunities to promote sustainable travel for the future occupants of new homes, including:
 - e. Partnership with Enterprise Car club to provide membership and car club vehicle on-site;
 - f. Electric vehicle charging facilities (including for e-bike);
 - g. High quality secure cycle parking facilities, including for non-standard cycles;
 - h. Travel vouchers for use on public transport;
 - i. Vouchers that can be used towards cycling equipment and repairs;
 - j. High speed broadband and home office provision to encourage flexible working patterns;

9.14 Highways & Connectivity

- a. The site is located adjacent to the urban area of Winchester, close to numerous local facilities and services including Winchester City Centre and the Kings Barton development. Good quality public transport connections are provided to the city centre which offer the opportunity to deliver a well-connected and sustainable extension to Winchester.
- b. Safe and suitable access is readily achievable onto B3047 Worthy Road adjacent to the site, providing access to one of the main arterial routes into and out of the City.
- c. The traffic impacts of the scheme will be modest and are not expected to give rise to significant mitigation requirements. Detailed assessment will be undertaken at the appropriate time and will identify any improvements and enhancements that may be needed.

9.15 Landscape

- a. The site is generally visually enclosed. It has no landscape designations nor is it clearly visible from publicly accessible areas in the South Downs National Park.
- b. The visibility of the site could be contained, which means in turn that the landscape effects of development would be localised.
- c. Whilst the site is currently identified as a Settlement Gap (Policy CP18), a substantial area of open space will ensure/keep a distance of 700m between Winchester and Kings Worthy and the perception of gap between settlements could be retained.

9.16 Biodiversity Net Gain & Nitrate Neutrality

- a. The existing arable cultivation on the land is suppressing the ecological interest on the site.
- b. The proposals present a significant opportunity for ecological habitat enhancement and creation and exceed biodiversity net gain requirements.
- c. The existing arable land use is associated with a high nitrate current use value. The cessation of this activity in combination with the large areas of proposed open space will be effective in ensuring the proposals are nitrate neutral.

9.17 Flood Risk & Drainage

- a. The EA's online Flood Map for Planning shows the site to be located almost entirely within Flood Zone 1
- b. Sustainable drainage solutions (SuDS) will be implemented on the site
- c. A diversity of SuDS will be implemented to maximise the benefits to water quality and biodiversity

Deliverability

- 9.18 The site is in the sole control of Wates and is being promoted as a single opportunity with a comprehensive masterplan.
- 9.19 Wates has completed a considerable amount of work to date such that they could, if the site were allocated, proceed to submit a planning application in a timely fashion. Wates has a good track record in progressing the development of their sites in a quick and efficient manner therefore the site is capable of being delivered swiftly. Wates' role as a house builder joint venture partner makes them distinct from other land promoters as it enables them to drastically reduce the time taken between securing an outline planning consent and delivering first home on site.

Integrated Impact Assessment (IIA)

- 9.20 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.
- 9.21 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.
- 9.22 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.
- 9.23 IIA2: travel and air quality: Given the urban edge location of Pudding Farm, it is accepted that the development site option could bring additional traffic to already used roads, where air quality might not be at its best, even if not AQMA. However, the accessibility of the site to public transport, and the significant opportunities for pedestrian bicycle connectivity must be balanced with the potential negative effects.
- 9.24 IIA4: health and wellbeing: Development site options at Pudding Farm will include access to the countryside, and significant open space / a country park, therefore a 'negligible' score here is questioned.
- 9.25 IIA7: services and facilities: It is disappointing to see a 'minor negative' assessment for this criterion. Pudding Farm is readily accessible by sustainable means to a range of services and facilities in Winchester.

- 9.26 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 urban edge development is to support the continued vitality and vibrancy of town and city centres. Pudding Farm with its sustainable access to Winchester centre will provide direct economic benefits to the city.
- 9.27 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, as it has demonstrated through these submissions and the associated Vision Document – biodiversity will be managed, and a net gain achieved.
- 9.28 IIA10: landscape: it is accepted that the current policy position for Pudding Farm is that it would close a ‘gap’ between Winchester and Headbourne Worthy, however Wates can demonstrate how this gap can be reinforced and properly protected – alongside some residential development – in the Vision Document for the site.
- 9.29 IIA11: historic environment: Wates agrees with the ‘negligible’ assessment here, as no heritage assets will be significantly affected.
- 9.30 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 commends its evidence to the Council on these matters.
- 9.31 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.
- 9.32 IIA14: flood risk: Wates agrees with the ‘negligible’ assessment here, as the site is entirely in Flood Zone 1
- 9.33 Having reviewed the IIA; Pudding Farm, Worthy Road 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.
- 9.34 The vision document at **Appendix A** of these submissions clearly demonstrates how development can be sustainably delivered at Pudding Farm, Worthy Road, and it is respectfully requested that it is allocated in the Local Plan.

10.0 CONCLUSION

- 10.1 Wates welcomes the opportunity to comment of the emerging Winchester City Local Plan. There are some matters of detail, touched upon in these submissions that are unsound, and critically, Wates requests that an additional site allocation is made at Winchester.
- 10.2 Overall, Land at Pudding Farm provides an excellent opportunity to deliver new housing and/or Care Village very close to local supporting facilities including Winchester city centre. In addition to providing much needed new housing in a suitable location, the site offers the opportunity to create a new country park and/ or solar farm to help the Council to achieve carbon neutrality, increase biodiversity and the health and wellbeing of its residents.
- 10.3 The Land at Pudding Farm is a small to medium sized site which the NPPF clarifies, at paragraph 70, can make an “important contribution” to meeting housing requirements, as it can be built out relatively quickly and is not reliant on significant infrastructure delivery.
- 10.4 Within this context, first consideration should be given to the Land at Pudding Farm. We would be delighted to work with the Council and other stakeholders to bring forward this exciting opportunity.
- 10.5 The Vision Document at **Appendix A** sets out the emerging development vision for the site and demonstrates that it could come forward in the emerging Local Plan as a deliverable strategic development site.
- 10.6 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 Winchester, for the reasons set out above.

11.0 PARTICIPATION AT THE ORAL PART OF THE EXAMINATION

- 11.1 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.
- 11.2 We also consider it important to share the vision for the Land at Pudding Farm and provide confidence as to its deliverability.

APPENDIX A – VISION DOCUMENT



LAND AT PUDDING FARM WINCHESTER

VISION DOCUMENT

December 2022

Wates 

Masterplanning, Desk Top Publishing and
Graphic Design by Mosaic.



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Pembroke Square
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London
W2 4EW

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01



INTRODUCTION

INTRODUCTION

This Vision Document has been prepared by Mosaic on behalf of Wates Developments Ltd (Wates) to support the allocation of Land at Pudding Farm, Winchester, (the “site”) to deliver much-needed new family and affordable homes as part of the sustainable growth of Winchester.

The site presents a fantastic opportunity to support Winchester City Council’s nine key areas of focus for addressing climate change through the adoption of Garden Cities Principles and the concept of a ‘20 minute neighbourhood’. The site provides new housing at a highly sustainable location and is capable of offering a range of benefits including a solar farm and/or country park to help the Council achieve its aim for carbon neutrality by 2030 while enhancing the health and wellbeing of its residents.

This document demonstrates the Land at Pudding Farm is deliverable, technically unconstrained and a sustainable location for new development. This document sets out our overall vision for the site and explores a number of different and sustainable options for achieving this vision.

SUMMARY OF BENEFITS



Meeting Housing Need

The site is deliverable and has no technical or viability constraints. It is capable of being delivered swiftly and in the early part of the plan period for 150-200 new market and affordable homes to ensure Winchester Town Centre meets its housing needs.



Sustainable Location

The site is ideally located adjacent to the urban area of Winchester and benefits from excellent public transport, walking and cycling routes. There are numerous local services and facilities within close proximity to the site which will reduce the reliance on private cars.



Biodiversity Net Gain

The proposals present an opportunity to significantly exceed Biodiversity Net Gain requirements and deliver an uplift in the region of 98% in habitat units and 31% in hedgerow units. This substantial surplus has the potential to offset other development sites in the District.

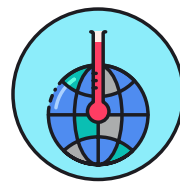


Nitrate Neutrality

The existing arable land use is associated with a high nitrate current use value. The cessation of this activity in combination with large areas of proposed open space can ensure the proposals are nitrate neutral and self-sufficient.



150-200 new homes and the creation of a new country park



Carbon Neutrality

This site can help the Council meet its Carbon Neutrality objective through the potential for an on-site Solar Farm and maximising opportunities around building efficiency.



Community Contributions

Contribute financially to new infrastructure through s106/ Community Infrastructure Levy payments

ABOUT WATES DEVELOPMENTS

Wates Developments 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. The business partners with a number of national housebuilders in joint ventures to deliver much-needed housing developments.

Everything we do is guided by our purpose of working together to inspire better ways of creating the places, communities and businesses of tomorrow. Our goals are to be more sustainable, trusted and progressive, and our people are driven by our behaviours of **'we care'**, **'we are fair'** and **'we look for a better way'**.

At Wates, we are committed to reducing our industry's environmental impact and our five-year strategy sets out this commitment and how we can be better custodians of the environment and protect our Earth's precious resources and habitats for future generations.

WATES IN WINCHESTER

Wates has been appointed by Winchester Council to deliver 76 high-quality affordable homes in Winnall, Winchester.

This forms part of the City Council's plans to regenerate the area and build attractive new homes that reflect the local area and integrate with the surrounding landscape.

Measures to **minimise carbon emissions**, promote renewable energy and manage water effectively will be integral parts of the scheme in order to align with Winchester City Council's

£7.6m spent with social enterprises

£15.2m social value created

Over 11,000 young people on Wates Build Yourself programme including...
2,085 primary-aged children on Wates' new Build Yourself Junior

Over 800 people upskilled through Wates pre-employment programmes



4 QUALITY EDUCATION



5 GENDER EQUALITY



8 DECENT WORK AND ECONOMIC GROWTH



9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



10 REDUCED INEQUALITIES



11 SUSTAINABLE CITIES AND COMMUNITIES



aim for the district to be carbon neutral by 2030. The proposed new units are designed to be highly sustainable (AECB) standard and provide for a high quality living environment for new and existing residents.

The scheme has also been designed to offer enhancements to local green spaces. This will include a new community park which will include seating, areas to socialise, a play area for younger children and food growing beds.

Wates and Winchester City Council have made a joint pledge to **provide additional education, employment and training opportunities** for local people as part of their investment in the local area. This will include providing a boost to the Winchester economy by employing local businesses and creating job opportunities for local people.

Cabinet Member for Housing and Asset Management, Cllr Kelsie Learney, said:

“Working with Wates is a great fit for the city council in helping us achieve our housing, environmental and employment goals. These 76 new homes in the Winchester district will help ensure more of our residents can afford to live in well-designed, energy efficient homes. We look forward to work starting in summer 2021.”





View looking south across the site with Abbott's Barton and Winchester in the background



View looking west across the site with the Kings Barton/Barton Farm development in the background



Close up view of the site looking south with the cottages of Worthy Road/London Road in the foreground

THE SITE: PUDDING FARM

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.

The Land at Pudding Farm extends to some 18.7 hectares in total and is split into four arable fields.

Barton Farm Cottages are located on Worthy Road, outside of the site boundary.

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.



Site in context. NTS



The site is located to the north of Abbott's Barton, Winchester and covers a total area of approximately 18.7 hectares.

The site. NTS

**THE BENCHMARK:
WINCHESTER CITY COUNCIL'S NINE KEY
AREAS OF FOCUS**



1. Carbon neutrality

At a local level, Winchester City Council has declared its own climate emergency and is committed to becoming a carbon neutral council by 2024. The ambition for the wider District is that it should become carbon neutral by 2030.

Response:

This site can help the Council meet its carbon neutrality objective through the potential for an on-site solar farm and maximising opportunities around building efficiency.



2. Biodiversity and the natural environment

The district covers around 250 square miles of beautiful and diverse landscapes which support numerous important species.

Response:

Significant Biodiversity Net Gain is achievable from habitat creation and enhancement of existing habitats in conjunction with the proposed development. The site can deliver an uplift of 98% in habitat units and 31% in hedgerow units supporting a large array of important wildlife.



3. Conserving and enhancing the historic environment

There is a rich wealth of historic assets in the district.

Response:

This site can help the Council meet its carbon neutrality objective through the potential for an on-site solar farm and maximising opportunities around building efficiency.



4. Homes for all

The Government wants to boost the supply and delivery of new homes.

Response: The site can deliver 150-200 much needed homes swiftly to ensure the Council can boost the supply and delivery of new homes through the plan period.



5. Creating a vibrant economy

Winchester town centre is a vibrant retail and commercial centre, with a growing leisure and tourism economy.

Response: The site benefits from close proximity to employment, including Winchester City centre and will ensure that home working opportunities can be supported with the provision of high speed broadband.



6. Promoting sustainable transport

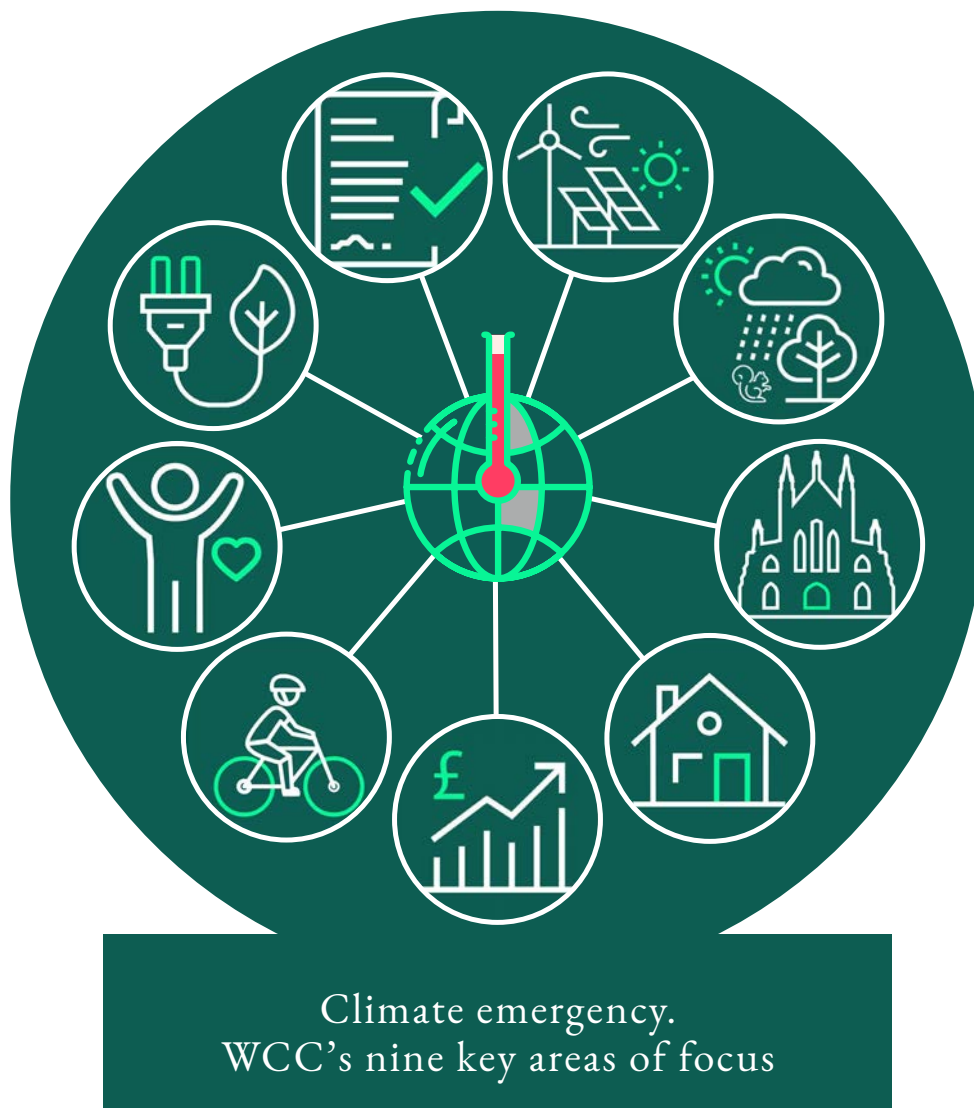
Transport is one of the highest sources of carbon emissions in the district. The Council has set ambitious targets for carbon neutrality as a Council by 2024 and as a district by 2030.

Response: The site is ideally located to benefit from excellent public transport, walking and cycling routes which will reduce the reliance on private cars.



7. Living well

The 'Living Well' topic of the Council's Local Plan is about creating places where people want to live, and ensuring those places do as much as possible to support our health and wellbeing and reduce inequality.



Response: New Green and Blue infrastructure has been incorporated into the proposals and the site is ideally located to existing high-quality open space.



8. Low carbon infrastructure and local plan viability

It is important the Council plans for infrastructure needs over the life of the new Local Plan.

Response: The Site seeks to employ Low Carbon infrastructure, such as a potential Solar Farm to support the Council's objectives.



9. Delivery and success of the local plan

Monitoring the Local Plan is important to ensure that the policies are working efficiently, and development targets are being met.

Response: This document demonstrates that the Site is deliverable, technically unconstrained and a sustainable location for new development.



Cobbs Farm Shop



Tesco Express and petrol station on Andover Road

THE 20 MINUTE NEIGHBOURHOOD

The idea of the ‘20-minute neighbourhood’ (also known as 15-minute cities) has grown with interest around the world, especially since the COVID-19 pandemic put a spotlight on the importance of the liveability of where we reside.

Another way of describing a complete, compact and connected neighbourhood, where people can meet their everyday needs within a short walk or cycle, the idea of the 20-minute neighbourhood presents multiple benefits including boosting local economies, improving people’s health and wellbeing, increasing social connections in communities and tackling climate change

The Land at Pudding Farm is a sustainable location for new development and benefits from a wide range of facilities, the majority of which are around a 20 minute walk.

The site offers a range of open space, including the potential for a new country park, to promote health and wellbeing and is within an easy walk of employment opportunities and a range of facilities to meet the day to day needs of its residents sustainably. In summary, the Land at Pudding Farm creates a unique and distinctive new neighbourhood based upon 21st century Garden City principles.



Sources:

<https://www.tcpa.org.uk/garden-city-principles>

<https://www.tcpa.org.uk/guide-the-20-minute-neighbourhood>

Guidance notes on Garden City Principles, Uttlesford District Council

02



ANALYSIS

SUSTAINABLY LOCATED

The site is sustainably located and enjoys access to a wide range of facilities.

Sustainability Audit

The Sustainability Audit is a comprehensive analysis of the site and the wider area encompassing assessment of the site's access to local facilities and connectivity.

We understand that access to local facilities is fundamental to the concept of locating sustainable development.

Winchester: A sustainable city

The site is at a highly sustainable location due to its relationship with the existing city centre of Winchester and the wide range of services, facilities and employment opportunities on offer. The site is also well located to benefit from the existing nearby employment, shopping, leisure and recreation areas of Abbott's Barton, Headbourne Worthy, Hyde, Fulflood and Weeke.



Building for a Healthy Life

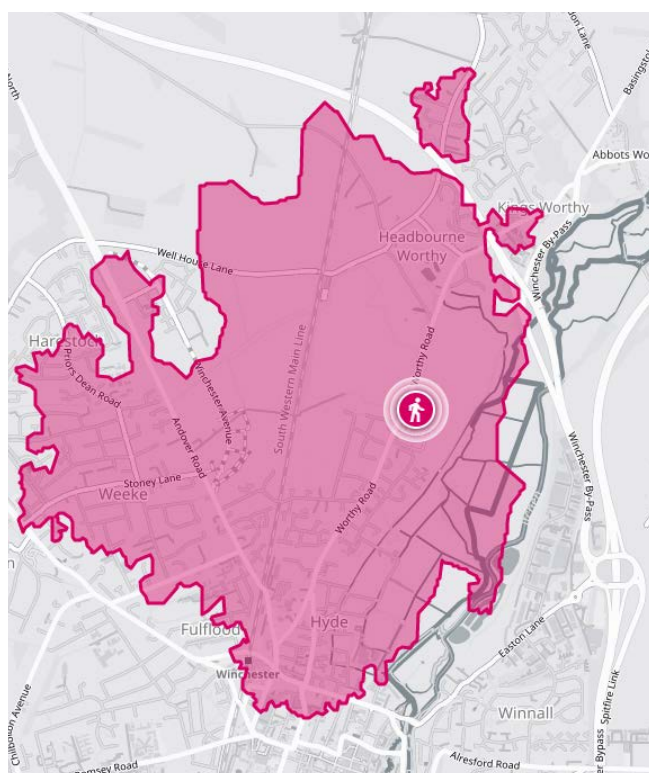
Building for a Healthy Life (BHL) is a tool to assess and compare the quality of proposed neighbourhoods. It has been

written by Design for Homes in partnership with Homes England, NHS England and NHS Improvement. Whilst BHL is usually awarded to completed schemes, the site selection criteria have been applied to the Land at Pudding Farm to demonstrate the sustainability of the design proposals. Building for a Healthy Life principles advise places should **'offer social, leisure and recreational opportunities a short walk or cycle from their homes'** and that developments should provide or be near to **'community facilities, such as shops, schools, workplaces, health facilities, co-working spaces, parks, play spaces, cafés and other meeting places that respond to local community needs'**.

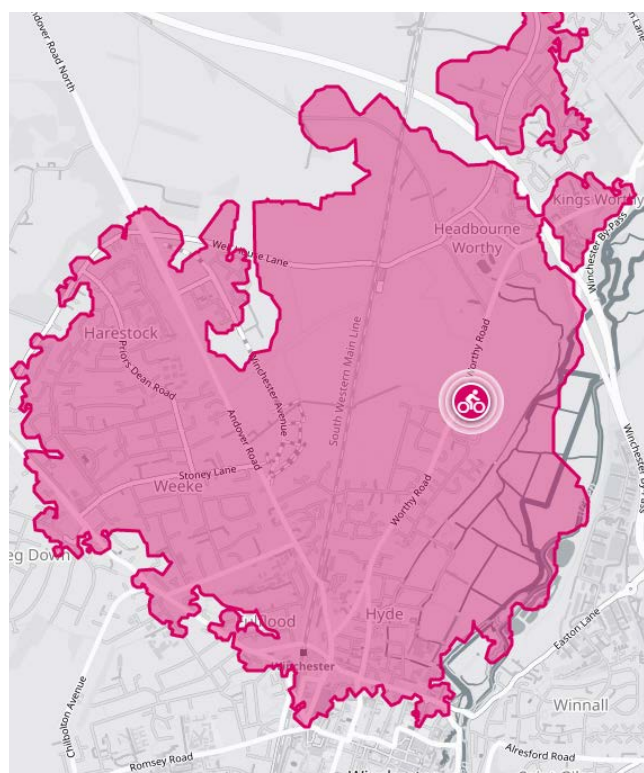
The facilities audit on the following pages demonstrates that the site is a sustainable location and fully meets the Building for a Healthy Life principles through existing local facilities.

Facilities audit

Facility	Destination	Distance (m)	Walking Journey Time	Cycling Journey Time
Education	Riverside Nursery School	1,350	16	5
	Kings Worthy Primary School	1,800	21	7
	Peter Symonds College	1,950	23	7
	Henry Beaufort School	2,750	33	10
Employment	London Road Industrial Estate	1,050	13	4
	Winchester City Centre	2,250	27	8
	Winnall Industrial Estate	3,250	39	12
Leisure	Allotments	1,050	13	4
	Chandler Road Playground	850	8	2
	Winchester City Football and Rugby Football Club	1,250	15	5
	River Park (& Leisure Centre)	1,600	20	6
	Cart & Horses Public House	1,350	16	5
	Winchester City Centre	2,250	27	8
Retail	Waitrose	1,850	22	7
	Cobbs Farm Shop	1,000	12	4
	Kings Worthy Post Office	1,600	20	6
	Winchester City Centre	2,250	27	8
	The Co-Operative	2,800	33	11
Health	St Cuthberts Dental Surgery	1,150	14	4
	St Paul's Doctors Surgery	2,350	28	9
	Lloyds Pharmacy	2,250	27	8
Transport	Bus Stops	300	4	1
	Winchester Railway Station	1,900	23	7



30 minute walk from the site



10 minute cycle from the site

KEY

- SITE BOUNDARY
- WINCHESTER CITY CENTRE
- STRATEGIC GREEN INFRASTRUCTURE
- LEISURE**
- L¹ LEA VIEW PLAYGROUND
- L² CHAUNDLER PLAYGROUND
- L³ PARK ROAD ALLOTMENTS
- L⁴ EDDINGTON ROAD ALLOTMENTS
- L⁵ WINCHESTER CITY FOOTBALL CLUB
- L⁶ WINCHESTER RUGBY FOOTBALL CLUB
- L⁷ NORTH WALLS RECREATION GROUND
- L⁸ KING ALFRED PUBLIC HOUSE
- L⁹ RIVER PARK LEISURE CENTRE
- L¹⁰ WINCHESTER RACQUETS AND FITNESS
- L¹¹ KINGS BARTON DEVELOPMENT
- L¹² CART AND HORSES PUBLIC HOUSE

EDUCATION

- ED¹ BARTON FARM PRIMARY SCHOOL
- ED² KINGS WORTHY PRIMARY SCHOOL
- ED³ RIVERSIDE NURSERY SCHOOL
- ED⁴ ST BEDE CE PRIMARY SCHOOL
- ED⁵ WINCHESTER SCHOOL OF ART
- ED⁶ PETER SYMONDS COLLEGE
- ED⁷ THE WESTGATE SCHOOL
- ED⁸ HENRY BEAUFORT SCHOOL

EMPLOYMENT

- E¹ LONDON ROAD INDUSTRIAL ESTATE
- E² WINCHESTER CITY CENTRE
- E³ WINNALL INDUSTRIAL ESTATE

RETAIL

- R¹ KINGS BARTON LOCAL CENTRE
- R² COBBS FARM SHOP
- R³ KINGS WORTHY POST OFFICE
- R⁴ HYDE CONVENIENCE STORE
- R⁵ WINCHESTER CITY CENTRE
- R⁶ WAITROSE
- R⁷ ALDI
- R⁸ STONEY LANE LOCAL SHOPS

HEALTHCARE

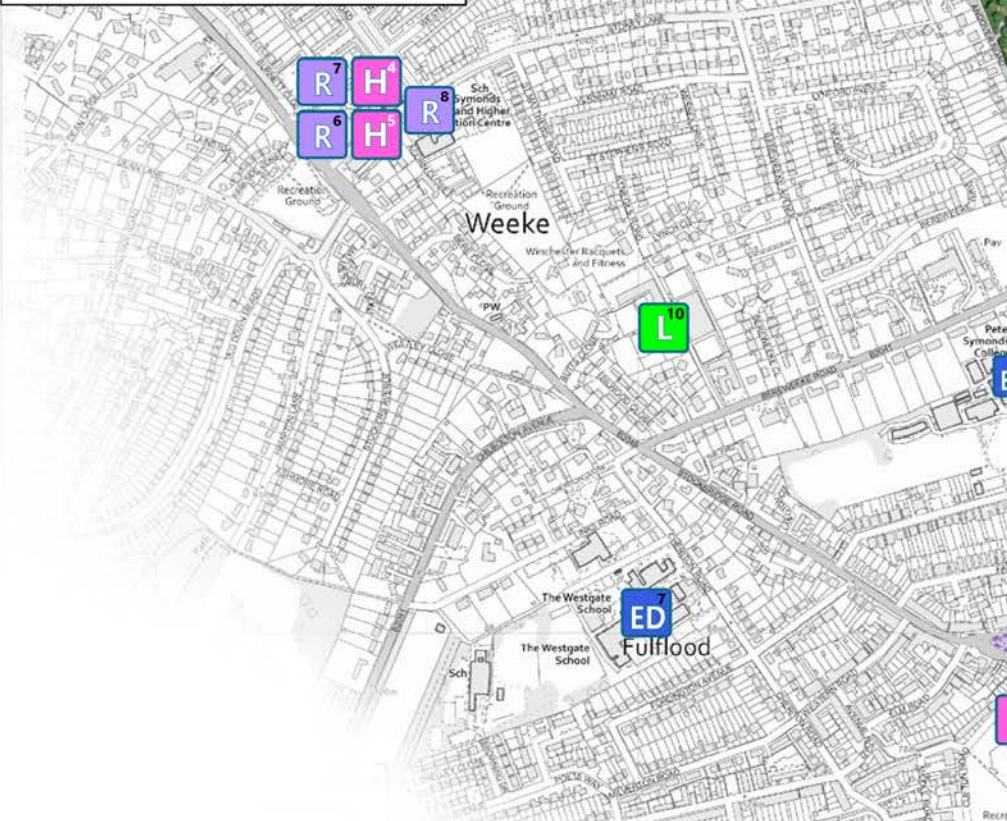
- H¹ ST CUTHBERTS DENTAL SURGERY
- H² ST PAUL'S DOCTOR SURGERY
- H³ LLOYDS PHARMACY
- H⁴ FRIARSGATE MEDICAL CENTRE
- H⁵ BOOTS PHARMACY

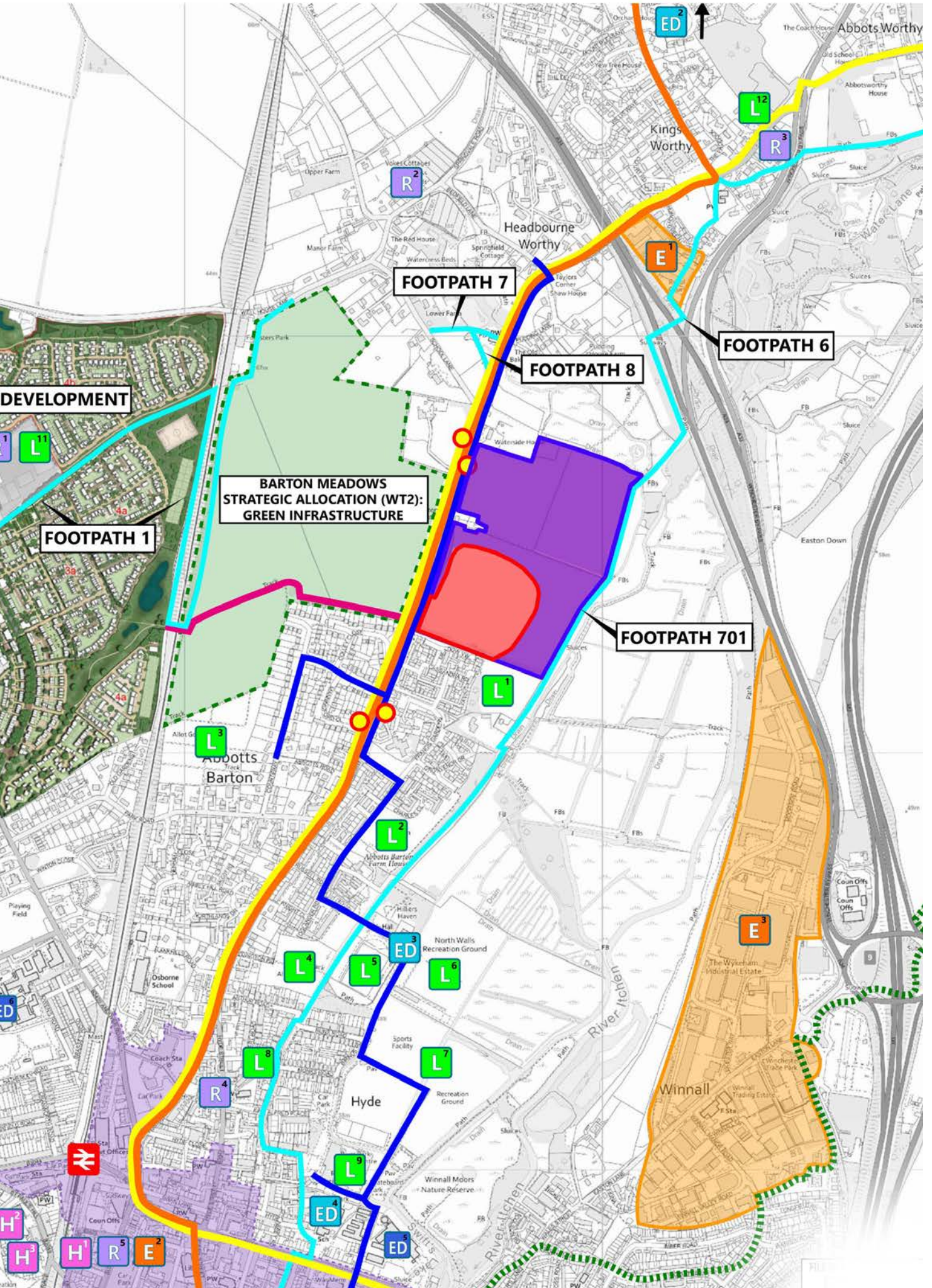
WALKING AND CYCLING

- PUBLIC FOOTPATH
- KINGS BARTON LINK
- NATIONAL CYCLE ROUTE 23 READING TO SOUTHAMPTON
- CYCLE ROUTE

PUBLIC TRANSPORT

- RAIL STATION
- BUS STOP
- BUS SERVICE: THE SPRING EVERY 15-30 MINUTES
- BUS SERVICE: 67 7 SERVICES PER DAY





Connectivity Audit: Public transport

The nearest bus stops are located on Worthy Road 300m from the centre of the site. These bus stops provide access to the number 67 bus service and the 'Spring' service which provide opportunities to travel to Petersfield and Winchester and Springvale/Kings Worthy and Winchester City Centre.

Bus Service	Destination	Monday - Friday	Saturday	Sunday
Springvale	Springvale - Kings Worthy - Winchester	Every 15-20 minutes.	Every 20 minutes	Every hour
67	Winchester - Kings Worthy - East Meon - Petersfield	Every 2 hours	Every 3 hours	-



Bus stop outside site on Worthy Road

Connectivity Audit: Rail

Winchester Railway Station is located 1.9km from the centre of the site, a comfortable cycle distance and provides the opportunity to travel to London Waterloo, Basingstoke, Bournemouth and Portsmouth and Southsea. The frequent 'Spring' bus service accesses the station.

Connectivity Audit: Walking and cycling

There is a continuous and well used shared footway/cycleway along the site frontage on the eastern side of Worthy Road providing access to Winchester to the south and Headbourne Worthy and Kings Worthy to the north. The Worthy Road Cycle Path connects Bedfield Land in the north with Abbots Barton in the south and is predominantly an off-road shared route.

Along the eastern boundary of the site, footpath 701 (St Swithun's Way) provides a route to Kings Worthy to the north and to Winchester to the south. This footpath connects with a wider network of public footpaths providing the opportunity to travel to other destinations to the north east located along the River Itchen.



Cart and Horses Public House (Kings Worthy)



Kings Worthy Post Office



Winchester town centre



Winchester Train Station



Footway on Worth Road into Winchester city centre

03



VISION

DEVELOPMENT OPTIONS

Our emerging technical work has informed a range of development options which are explored in the following pages.

Options include:

1. Up to 150-200 homes and a country park
2. Up to 150-200 homes and a solar farm
3. Up to 150-200 homes and a country park and solar farm

Each of the development options contains a number of key common characteristics and features that will instil the principles of a healthy and sustainable community.



Climate emergency.
WCC's nine key areas of focus

Each option is deliverable, unconstrained and sustainable and will help WCC to achieve carbon neutrality by 2030 and beyond while creating a significant net biodiversity gain.

Option 1: 150-200 new homes and the creation of a new country park

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 and the creation of a solar park

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 and the creation of a new country park and solar park

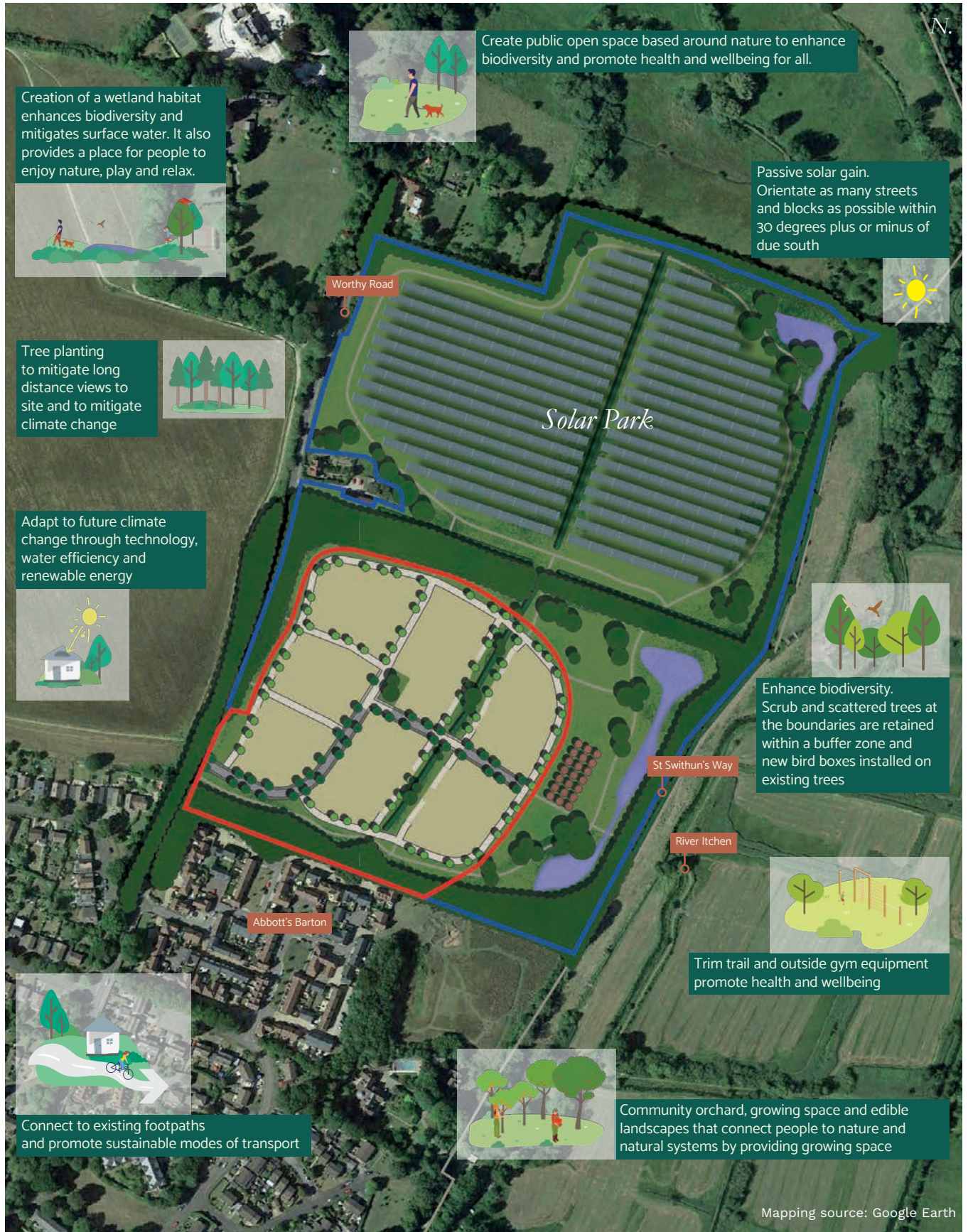
This approach seeks to balance the environmental benefits of both the county park and solar park to address the key areas of both biodiversity and the natural environment and carbon neutrality.

As part of the progression of the site, engagement with both Winchester City Council and local residents will inform a desired approach.

Option 1: 150-200 new homes and the creation of a new country park



Option 2: 150-200 new homes and the creation of a solar park



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



MOOD BOARD: HIGH QUALITY HOMES AND SOLAR FARM



MOOD BOARD: COUNTRY PARK

Potential activities within the country park.

1. Animal grazing
2. Dog walking paths
3. Picnic areas
4. Allotments, community gardens and productive and edible landscapes
5. Walking and cycling routes
6. Outdoor trim trail & outdoor gym equipment
7. Nature interpretation boards
8. Meadow landscapes
9. Quiet areas
10. Public art
11. Formal play areas
12. Natural play areas
13. Education landscapes
14. Wildlife habitats and hides



Creating a Nature Recovery Network

1. *Improve species diversity*
2. *Connect a network of semi-natural habitats*
3. *Allow habitats to develop naturally over time in accordance with rewilding principles*

Play for all

Play for all ages including formal children’s play area, natural play and nature trails.



04



DELIVERABILITY

HIGHWAYS

- The site is located adjacent to the urban area of Winchester, close to numerous local facilities and services including Winchester City Centre and the Kings Barton development. Good quality public transport connections are provided to the city centre which offer the opportunity to deliver a well-connected and sustainable extension to Winchester.
- Safe and suitable access is readily achievable onto B3047 Worthy Road adjacent to the site, providing access to one of the main arterial routes into and out of the City.
- The traffic impacts of the scheme will be modest and are not expected to give rise to significant mitigation requirements. Detailed assessment will be undertaken at the appropriate time and will identify any improvements and enhancements that may be needed.

Introduction

There are three main transport issues that need to be considered for all development and proposals, set out in paragraphs 108 and 109 of the National Planning Policy Framework (February 2019) and reflected in local transport policy.

This appraisal therefore considers the residential development of the site against the following tasks:

1. Can the opportunities for sustainable travel modes be appropriately taken up?
2. Can safe and acceptable access be provided?
3. Will the traffic impacts be acceptable?

Residential development of the site can meet all of these three tests.

The site abuts the urban area of Winchester, directly north of the Abbott's Barton area of the City. Winchester City is the primary settlement in the district and offers a wide range of facilities and services, as well as key employment opportunities. Locating development close to the key services and facilities provided by Winchester City offers the most sustainable option for growth.

Pedestrian and Cycle Connectivity

The site is well connected to existing and future pedestrian and cycle connections, and its location means much of the City is within a reasonable walking and cycling distance of the site. The city centre can be reached in a pleasant 20-25 minute walk, or a short 6-7 minute cycle ride.

An existing shared continuous footway/ cycleway (part of the Worthy Cycle Route) is provided along the site frontage on the eastern side of Worthy Road providing access to Winchester City Centre to the south and Headbourne Worthy and Kings Worthy to the north. This provides a key connection from the site to local amenities. Additionally, the new Kings Barton Cycle link is due to be completed shortly and will connect the site to Kings Barton and the northern areas of the City, including Weeke and Harestock. Most of Winchester can be reached within a 10-15 minute cycle journey.

Along the eastern boundary of the site, Footpath 701 provides a north / south route to Kings Worthy and Winchester City Centre respectively, routing through River Park, providing an attractive alternative to the Worthy Road corridor.

Pedestrian and cycle access would be provided from the site to the Worthy Cycle Route, the Kings Barton Cycle Link and to Footpath 701. The scheme provides opportunities for local improvement to connect local routes and to improve existing connections in line with the Winchester Movement Strategy.

Public Transport

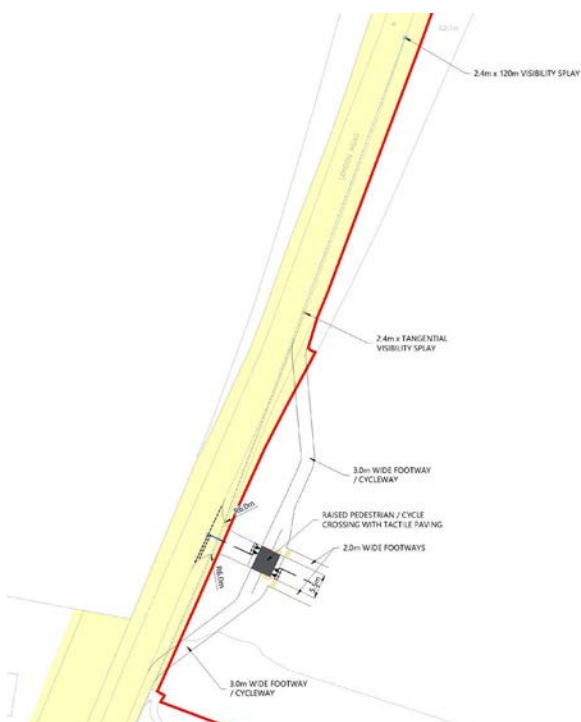
Excellent existing bus services are available along Worthy Road with bus stops adjacent to the site boundary providing access to bus services 67 and The Spring. The Spring service provides a frequent and attractive everyday connection for travel to Winchester City Centre (a journey of 5-10 minutes). Service 67 provides a route to destinations further afield including New Alresford and Petersfield, as well as Winchester City Centre. A range of further onward services are also available from Winchester City Centre.

Winchester Railway Station is located 1.9km from the centre of the site and provides the opportunity for travel destinations further afield including London, Southampton, Basingstoke, Portsmouth and Bournemouth.

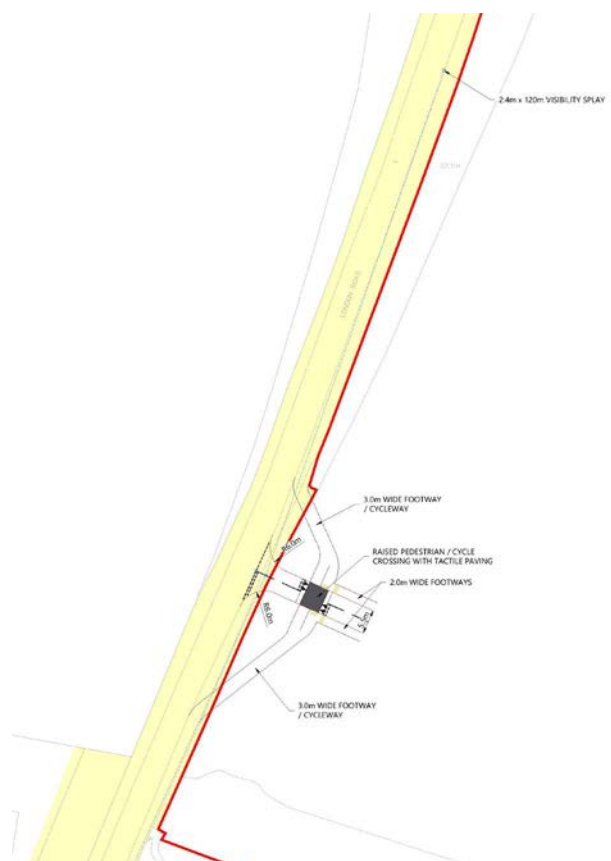
Access

Safe and acceptable site access will be provided in the form of a three-arm simple priority junction onto Worthy Road. Worthy Road is a single carriageway road and is subject to a 40mph speed limit. It gives a connection to Andover Road to the south and the A33 Winchester By-Pass to the north. A 5.5m wide carriageway access road can be provided into the site with footway/ cycleway connections to the existing Worthy Cycle Route on Worthy Road. Visibility to Worthy Road can be achieved in line with the observed speeds providing visibility splays of 2.4m x 120m in each direction. There is the potential to enhance walking and cycling provision on Worthy Road as part of the scheme.

Initial assessment demonstrates that access can be achieved in line with design standards and that it would operate effectively.



Option 1 access junction location



Option 2 access junction location

Traffic Impact

The traffic generation of the scheme will be circa 75-100 vehicle movements in the peak hours with traffic likely to distribute equally north and south on Worthy Road. The development would be likely to result in less than one additional vehicle every minute both north and south of the site. This level of modest traffic increase is not expected to materially impact on the operation of the local road network.

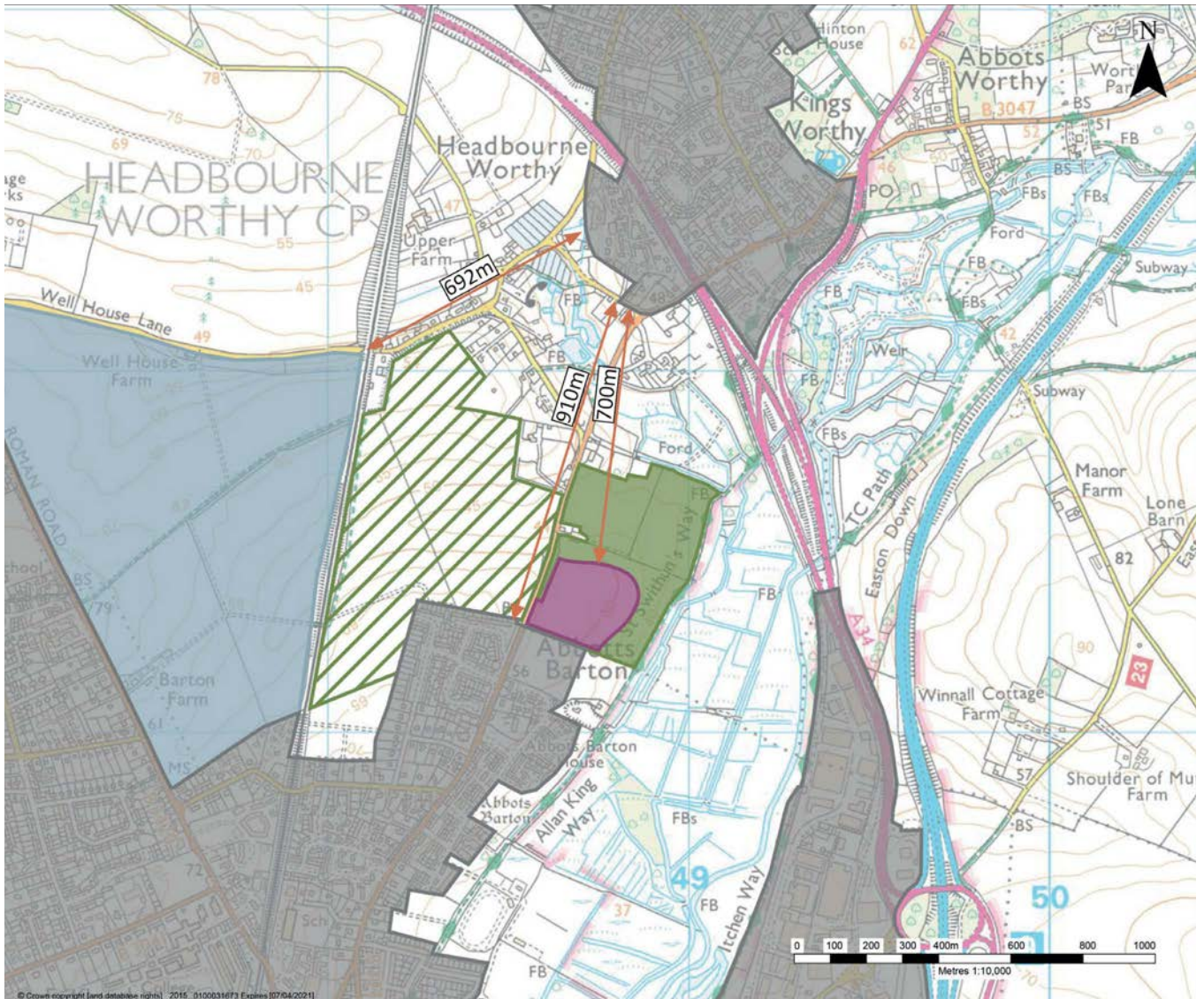
A detailed Transport Assessment would be prepared to appraise the impacts of the scheme, in particular to consider the impact on the A33 Winchester By-Pass / B3407 priority junction (Cart and Horses junction) and B3045 Worthy Lane / B3420 Andover Road junction (Cattle Market Junction). Any improvements needed to the local network would be identified.

LANDSCAPE

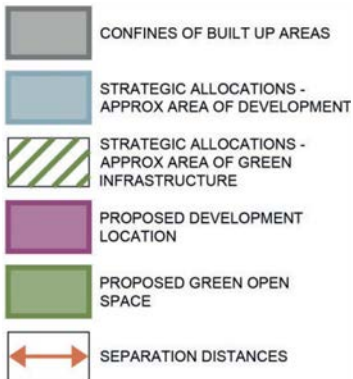
- The site is generally visually enclosed. It has no landscape designations nor is it clearly visible from publicly accessible areas in the South Downs National Park.
- The visibility of the site could be contained, which means in turn that the landscape effects of development would be localised.
- Whilst the site is currently identified as a Settlement Gap (Policy CP18), a substantial area of open space will ensure/keep a distance of 700m between Winchester and Kings Worthy and the perception of gap between settlements could be retained.

The site is generally visually enclosed. There is a strong tree belt to the south screening views from the settlement edge, and views from Worthy Road are limited to breaches in the hedgerow at the southern end of the site. The site is located within an area identified as a Settlement Gap (Policy CP18) within the Winchester District Local Plan Part 1 which seeks to “retain the generally open and undeveloped nature” of land between settlements. There are many precedents which indicate that physical distance is not the only way of determining the effectiveness of a gap and that the perception of “leaving one place and arriving somewhere else” is more important (see, for example, the Eastleigh rules, cited in the ODPM report (2003) on strategic gaps). Whilst development within the site would physically reduce the gap between settlements the perception of a robust and open, undeveloped, gap between settlements could be retained.

The most common way of experiencing the gap between Winchester and Headbourne Worthy is from the Worthy Road. Development would be substantially screened from the Worthy Road through the retention of existing boundary vegetation and reinforcement of this boundary with new, mixed, native tree and shrub planting. In addition, a substantial area of open space would be defined to the north of proposed built form which would provide a defensible area of open and undeveloped land, which would connect with allocated green infrastructure to the west, providing a defensible network of open space between Winchester and Headbourne Worthy.



Landscape analysis of settlement



Ecology & Nitrate Neutrality

- The existing arable cultivation on the land is suppressing the ecological interest on the site.
- The proposals present a significant opportunity for ecological habitat enhancement and creation and exceed biodiversity net gain requirements.
- The existing arable land use is associated with a high nitrate current use value. The cessation of this activity in combination with the large areas of proposed open space will be effective in ensuring the proposals are nitrate neutral.

As the site is currently under a modern arable farming regime that is biodiversity-poor, a significant Biodiversity Net Gain is achievable from habitat creation and enhancement of existing habitats in conjunction with the proposed development if the site is allocated.

Preliminary calculations using Defra's Version 2.0 Biodiversity Metric indicate that an uplift in Habitats Units in the region of 98% and an uplift in Hedgerow Units in the Region of 31% should be achievable. This will be delivered through a variety of interventions including creation of significant areas of species and wildflower-rich lowland calcareous (chalk) grassland and ponds – both of which are 'Priority' habitats for nature conservation under Section 41 of the Natural Environment and Rural Communities Act 2006, as well as being sought by Local Biodiversity Action Plans for Winchester City Council and Hampshire County Council.

Surveys for protected species would be carried out as normal prior to any planning application, but at this stage it is not predicted that there are any insurmountable constraints to the proposed development. It is anticipated that species specific enhancement measures will be secured as a result of the



Species rich chalk grassland. Credit EPR Ecology



Species rich neutral grassland. Credit EPR Ecology



Dark green fritillary on musk thistle. Credit EPR Ecology



Wildlife pond. Credit EPR Ecology

Flood Risk and Drainage

- The EA's online Flood Map for Planning shows the site to be located almost entirely within Flood Zone 1
- Sustainable drainage solutions (SuDS) will be implemented on the site
- A diversity of SuDS will be implemented to maximise the benefits to water quality and biodiversity

The EA's online Flood Map for Planning shows the site to be located almost entirely within Flood Zone 1 (Low probability) which

represents land where the EA considered the annual probability of flooding from rivers or the sea to be less than 1 in 1,000 (0.1%).

The 2007 SFRA includes mapping of the Distribution of Soil Permeability. This shows the site to be located in an area with a Standard Percentage Runoff (SPR) value of 2.0%. A low SPR value indicates that a high rate of infiltration could be achieved. However, this would need to be confirmed through further site investigation.

There is a large area of open space proposed in the east of the site, outside of the proposed development boundary. There is space for the use of SuDS to provide the attenuation required to reduce discharge to a greenfield rate.

Sustainable drainage solutions (SuDS) will be implemented on the site to manage increases in surface water runoff as a result of the proposed development, improve the water quality particularly in runoff from trafficked areas, and to create spaces for people to enjoy and nature to thrive. Surface water runoff from the impermeable areas of the site will be collected via permeable paving, swales and point drainage systems, and conveyed to above and below ground storage solutions which may include permeable sub-bases, cellular storage, ponds and pocket wetlands. A diversity of SuDS will be implemented to maximise the benefits in terms of land take, water quality and biodiversity, and will be sized to manage the 1 in 100 year rainfall event including for a 40% allowance for the anticipated future effects of climate change. The site is not shown to be located within a groundwater source protection zone and no reasons have been identified to suggest that infiltration would not be permitted.



CONCLUSION

This document has demonstrated the site is deliverable, technically unconstrained and is an inherently sustainable location for new development which can contribute to the Council's aim of being a carbon neutral district by 2030.

This document has also set out our overall vision for the site and development capacity options.

Overall, Land at Pudding Farm provides an excellent opportunity to deliver new housing very close to local supporting facilities including Winchester city centre. In addition to providing much needed new housing in a suitable location, the site offers the opportunity to create a new country park and/or solar farm to help the Council to achieve carbon neutrality, increase biodiversity and the health and wellbeing of its residents.

The Land at Pudding Farm is a small to medium sized site which the NPPF clarifies, at paragraph 68, can make an "important contribution" to meeting housing requirements, as it can be built out relatively quickly and is not reliant on significant infrastructure delivery.

Within this context, first consideration should be given to the Land at Pudding Farm. We would be delighted to work with the Council and other stakeholders to bring forward this exciting opportunity.



APPENDIX B – PUDDING FARM GAP REVIEW

3.0 ASSESSING THE FUNCTIONALITY OF GAPS

When assessing the effects of development upon settlement gaps, the **Eastleigh Criteria** are often cited. The Eastleigh Criteria were first set out in 1998 by the Local Plan Inspector for the Eastleigh Local Plan, and they were subsequently quoted in a government study of the functionality of gaps, “*Strategic Gap and Green Wedge Policies in Structure Plans, Main Report*”, (ODPM, 2003). Fundamentally the criteria recognise that the robustness of a gap depends on much more than the physical distance between settlements, or visibility between settlements. Instead, the key is a **perception of separation, or a sense of leaving one place, travelling through an intermediate landscape, and then arriving somewhere different.** The Local Plan Inspector recognised that this perception relies on an interplay of a number of potential factors, as follows:

- *Distance;*
- *Topography;*
- *Landscape character/type;*
- *Vegetation;*
- *Existing uses and density of buildings;*
- *Nature of urban edges;*
- *Inter-visibility (the ability to see one edge from another);*
- *Intra-visibility (the ability to see both edges from a single point);*
- *The sense of leaving a place [and arriving somewhere else].*

Careful application of the Eastleigh Criteria means that the gaps between settlements will vary in their size and character – some may be over a kilometre wide and others just a few hundred metres – the key is whether the factors above work together to maintain a *perception of separation* between the settlements. Equally importantly, the careful application of the Eastleigh criteria means that some development within a designated gap could be possible, provided that the sense of separation between settlements is not undermined.

The Policy Framework for Gaps produced by the Partnership for Urban South Hampshire (PUSH, produced in 2008) provides guidance for Local Planning Authorities on formulating strategic gap policies, and this builds on the Eastleigh Criteria. It states that “*the designation of a gap ... does not completely preclude development. Proposals which would not adversely affect the function of the gap and which would otherwise be acceptable in planning terms could be permitted.*”

A helpful analysis of the functionality of settlement gaps is also provided in the Fareham Landscape Assessment 2017 (LDA, section 3.0 chapter 3.0), and this illustrates how the Eastleigh Criteria can be applied in practice:

Separation of settlements ... is not just about preventing physical coalescence, i.e. development within one settlement running continuously into the next with no physical space or barrier to separate them. It is also not just about maintaining a visual gap and preventing

visual coalescence between settlements - while this can often be a key factor in achieving separation, it is perfectly possible for two settlements to be in sight of one another (e.g. on either side of a valley) and still maintain their separate identities because of the nature of what lies between them.

*For a gap to be effective, it is the **perceived 'sense of separation'** that is critical, the ability for anyone to 'feel' and to understand where one place ends and another different place begins, and to experience a clear sense of moving out of one and into the other. There can be no hard and fast rules about how big a gap needs to be to achieve that perception of separation. This will be dependent entirely on the particular character of the settlements and the land that lies between them. What is critical, however, is that there is a clear and distinctive experience of leaving one settlement behind, passing through another quite different area (the 'gap') before entering another separate settlement. This experience of travelling from out of one place into another can be both physical and visual. Importantly, the 'bit in between' needs to have integrity and distinct character as an entity or place in its own right, rather than simply be a physical space or feature, such as a field or a block of woodland etc., in order for the two settlements to feel distinct and separated".*

4.0 ASSESSMENT OF HOW DEVELOPMENT AT PUDDING FARM COULD RETAIN THE SENSE OF SEPARATION BETWEEN WINCHESTER AND KINGS WORTHY

A concise review of how residential development at Land at Pudding Farm might affect the sense of separation between Kings Worthy and Winchester, with reference to the Eastleigh Criteria, is set out below:

- a) **Distance:** Most discrete settlements in the UK are separated by a gap of at least 200 metres. If the south-western field at Pudding Farm were to be developed (as envisaged in Option 1) there would remain a 650 metre gap between the new northern edge of Winchester and the settlement edge at Kings Worthy. There would therefore remain a significant distance between the settlements that would continue to provide a sense of separation.
- b) **Topography:** Pudding Farm itself is located on a break of slope, with land to the north of this (within the site) sloping down towards Kings Worthy, and land to the south of this point sloping to the south and east. This landform means that development placed to the south of Pudding Farm would face away from Kings Worthy, and could potentially not be visible from points along the Worthy Road. The topography of the site would therefore help to maintain the sense of separation between the settlements.
- c) **Landscape character/type:** the proposed form of development at Pudding Farm would retain open fields at the north of the site, and this, in combination with other retained, hedgerow-bounded fields on the southern edge of Kings Worthy, would ensure that there would remain a significant area of intact, rural landscape between the two settlements. This area of countryside creates a "place in its own right" between the two settlements, which would continue to provide a sense of clear separation between Kings Worthy and Winchester.
- d) **Vegetation:** There would remain a strong and intact framework of hedgerows between the two settlement edges, as well as a large number of mature and semi-mature trees. The development proposals proposed at Pudding Farm would all retain the onsite hedgerows, with residential development being placed to the south of the existing central, west-east hedgerow. The presence of strong structural vegetation at the north of the site, and to the

north of the site, decreases the potential for intervisibility between settlement edges and also reinforces the rural character of the gap between the settlements.

- e) **Existing uses and density of buildings:** if development were to occur as shown in the Vision document, the remaining gap between the settlements would comprise largely open fields, with some low density built form, often associated with fields and large gardens. In contrast, the two settlement edges at Kings Worthy and Winchester would have a clearly urban or suburban form, at much higher densities
- f) **Nature of urban edges:** the proposed residential development at Pudding Farm would be contained by the existing central hedgerow running west-east through the site, with some additional native tree and shrub planting. To the north of this would be a country park, comprising the retained open field restored to species-rich grassland. The overall effect of this settlement edge would be soft and green, with built form largely screened by the existing break of slope, hedgerow and additional tree planting. The Kings Worthy settlement edge is a low density, well-vegetated edge, where houses are glimpsed but are not prominent. The two settlement edges would thus remain green and well-screened, which reinforces the rural character of the gap and reduces the potential for intervisibility.
- g) **Inter-visibility (the ability to see one edge from another):** there would be no opportunities to see one settlement edge from the other, due to the strong framework of mature vegetation between the two edges.
- h) **Intra-visibility (the ability to see both edges from a single point):** there are no points between the two settlements from where both edges would be visible. There are also no publicly accessible viewpoints within the South Downs National park, to the east, from which both settlement edges would be visible.
- i) **The sense of leaving a place [and arriving somewhere else]:** the interaction of the factors above means that if the land at Pudding Farm were to be developed, as illustrated in the Vision Document, there would be continue to be a strong sense of leaving through an intermediate, rural location, and arriving somewhere else.

5.0 CONCLUSIONS ON THE GAP REVIEW

By applying the Eastleigh criteria it is clear that development of land at Pudding Farm, in the form illustrated in the Vision Document, would not undermine the function of the gap, and would retain the separate identities of Kings Worthy and Winchester. The proposed residential development at Pudding Farm would thus comply with the requirements of draft policy NE7.

