

Winchester District Local Plan Examination

Matter 8: Development Allocations for the Market Towns and Rural Areas

ON BEHALF OF ST PHILIPS LAND

April 2025

Matter 8: Development Allocations in the Market Towns and Rural Areas (MTRAs)

Issue: Whether the proposed housing site allocations in MTRAs would be justified, effective and consistent with national policy?

Intermediate Rural Settlements

Otterbourne – Policy OT01 Land East of Main Road

1. Housing need in Otterbourne is proposed to be met through an allocation in this Plan, windfall and net completions in or adjoining the settlement. In this respect would the Plan be positively prepared and robustly justified by the evidence?

1. No.
2. Our response to Matter 2 confirms that it is not clear how the level of housing proposed in each of the settlement tiers of the Market Towns and Rural Area, nor that specifically proposed at each settlement, has been determined. We are also not aware of evidence to demonstrate that the housing ‘needs’ of Otterbourne itself have been specifically identified / considered by the Council.
3. Policy OT01 identifies that Otterbourne will provide a total of 77 dwellings over the Plan period. However, there does not appear to be any evidenced justification for this level of housing provision, be that the level proposed by way of a specific allocation (55 of the 77 proposed dwellings) or the assumed windfall allowance that is specifically attributed to Otterbourne (20 of the 77 proposed dwellings).
4. The Council’s SHELAA and its Integrated Impact Assessment Report (July 2024) (“IIA”), and our previous submitted representations at both the Regulation 18 and 19 stages, confirm that there is more than one deliverable site that could be allocated at Otterbourne.
5. For example, Park Farm, Land at Kiln Lane, Otterbourne was submitted to the Council and considered in the SHELAA under ref: OT04 and the SHELAA concludes that it is deliverable/developable in the first 5 year period, with an indicative capacity of 68 dwellings. Further consideration of OT04, alongside 8 other sites in Otterbourne, was then provided through the Council’s IIA. It should be noted that the scoring of OT04 is shown in the IIA as being the same as the site that is proposed to be allocated at Otterbourne under Policy OT01 (Land East of Main Street, SHELAA ref: OT03) in all but one sub-category of one criterion, that relates to open space on the site which could be lost to development: *“more than 25% of the site is considered to contain open space, open country or registered common land which could be lost to development.”*
6. With specific regard to this point, the Land at Kiln Lane (OT04) is not publicly accessible and as such there would not be any loss of open space, open country or registered common land resulting from its development. As such, the assessment of this site in the Council’s IIA should be amended accordingly for accuracy. As a consequence, Site OT04 would score equally with Site OT03.
7. For clarity, we are not suggesting that Site OT04 should replace the proposed allocation on Land East of Main Street (OT03) but instead that it should be allocated in addition, as a sustainable extension to the village. This would eliminate the need for a windfall assumption at Otterbourne (see below).

Windfalls

8. Paragraph 69 of the National Planning Policy Framework (December 2023), under which the submitted Plan is to be examined, is clear that planning policies should be identifying “specific” deliverable and developable sites insofar as this is possible over the Plan period. By choice, however, the Submission Plan does not do this, with the Council instead choosing to include generic (and we would suggest unrealistic) windfall allowances for each of the Intermediate Rural Settlements, including Otterbourne. This approach is adopted by the Council despite its own evidence (including the SHELAA) confirming that there are sustainable, deliverable sites (including OT04 at Otterbourne) that could be allocated in the Plan now that would eliminate the need for such a windfall allowance.
9. Paragraph 72 of the NPPF 2023 states that where an allowance is made for windfall sites, these must be ‘compelling evidence’, having regard to historic trends and expected future trends, that these will provide a reliable source of supply. The Council has produced a Windfall Assessment Report (“WAR”) (February 2021) to justify its substantial windfall supply. However, as our representations to the Regulation 19 consultation demonstrate, the Council over-estimates how much housing can be delivered via windfall development, specifically with regard to the provision assumed at Intermediate Rural Settlements such as Otterbourne.
10. The WAR confirms that only 46 net dwellings were completed as windfalls between April 2012 to March 2019 in the now defined ‘Intermediate Rural Settlements’. Most of these (20 dwellings) were delivered in just one settlement (Waltham Chase) which was in fact defined as a ‘Market Town and Larger Village’ in that period. This equates to an annual windfall delivery rate of just 7 dpa at these Intermediate Rural Settlements as a whole.
11. The Submission Plan assumes that, of a total provision of 360 dwellings at this level of the settlement hierarchy, only 155 dwellings are to be delivered via planned allocations (43%), with the remaining 205 dwellings (57%) assumed to be delivered from currently unidentified windfalls. The Local Housing Needs Assessment for Otterbourne (provided as Appendix 2 to our Regulation 19 representations) identifies that the five settlements within the Intermediate Rural Settlements have delivered a total of 24 dwellings from windfall sites in the period 2020-2023. This leaves a residual of 181 dwellings to be provided from windfall development. Using the Council’s own data in the WAR, however, a windfall build-out rate of 7 dpa on average would only deliver a total of 105 dwellings over the remaining 15 years of the Plan period in this category of the settlement hierarchy (assuming that the Plan is adopted in 2025). This would leave an approximate shortfall of some 76 dwellings in the Council’s housing supply for the Intermediate Rural Settlements.
12. To exacerbate this further, the Submission Plan is prescriptive in providing a breakdown of how and where this windfall provision is to be delivered; with a 20 dwelling windfall allowance identified for each of the five Intermediate Rural Settlements, including Otterbourne (as part of Policy OT01).
13. Identifying specific windfall provision at each settlement is wholly at odds with the very nature of ‘windfall’ development i.e. where it is not possible to predict specifically where this development will come from and be located.
14. Furthermore, the evidence of past completions in these settlements does not support the level of assumed windfall provision. At Otterbourne, for example, completions over the period 2008/09 to 2022/23 have only totalled 12 dwellings - an average of 0.8 dpa. If this average annual delivery was taken forward for the remaining 15 years of the Plan period, this would deliver 12 dwellings in total at Otterbourne – a level materially lower than the windfall allowance attributed to Otterbourne.
15. Furthermore, the evidence of past completions¹ in the smaller settlements in the District confirms that windfall development largely comes forward in developments of 1 and 2 net additional dwellings, and almost exclusively on sites providing less than 5 dwellings. Whilst this form and scale of development would be liable to Community

¹ Taken from Winchester District Annual Monitoring Reports, and summarised in the Local Housing Needs Assessment provided as Appendix 2 to our Regulation 19 representations.

Infrastructure Levy (CIL) contributions, they would not provide any affordable housing, or be of the scale to deliver any on-site community infrastructure, or contribute to off-site community infrastructure provision not covered by CIL.

16. Accordingly, unplanned development at Intermediate Rural Settlements, including Otterbourne, would increase the overall population of the settlements, creating extra demands on existing infrastructure, but without delivering wider improvements to accommodate the growth, most notably in relation to affordable housing.
17. This approach, and the disbenefits that flow from it, is wholly unnecessary as the Council's own evidence base (including the SHELAA) confirms that there are deliverable sites available that could / should be allocated now. For example, at Otterbourne, Site OT04 is a site that the SHELAA confirms is deliverable/developable in the first 5 years and could deliver a capacity of 68 homes, which would include up to 27 affordable homes, together with the proposal for a 'Park and Stride' area within the south west corner of the Site to support the primary school. The allocation of such additional sites is consistent with objectives of paragraph 69 of the Framework 2023, provides certainty to the Council and local residents and, importantly, would maximise the delivery of much-needed affordable housing and other social infrastructure.
18. In view of the above, the windfall provision included in Policy OT01, and indeed for all five Intermediate Rural Settlements, is unjustified and contrary to Paragraph 72 of the NPPF 2023.
19. The windfall allowance should be eliminated and replaced with the allocation of specific deliverable sites including by way of example, Park Farm, Kiln Lane, Otterbourne (OT04).
20. In addition, and as demonstrated by the Local Housing Needs Assessment for Otterbourne provided as part of our Representations at the Regulation 19 stage, the specific housing needs and characteristics of Otterbourne are such that additional development is justified, over and above that proposed by Policy OT01, even without further consideration as to whether Otterbourne can sustainably provide a greater contribution to meeting unmet housing needs in South Hampshire (which it demonstrably can).
21. As a consequence of the above, it is evident that the Plan has not been positively prepared in regard to the approach to Intermediate Rural Settlements, and Policy OT01 /Otterbourne specifically.

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