

Winchester Local Plan 2020-2040 Examination

Our ref 15877/01/MS/MT
Date 4 April 2025
From Lichfields on behalf of O'Flynn Group

Subject Matter 2: Spatial strategy and distribution of development

Whether the spatial strategy and distribution of development is positively prepared, justified, effective and consistent with national policy.

Q1. The Settlement Hierarchy Review (2024) scores settlements and groups them which provides the settlement hierarchy in the District. Is the methodology used robust and the outcomes accurate? Is the distribution of development between the tiers of settlements justified and how has it been established?

1.1 No response.

Q2. Is the spatial strategy and settlement hierarchy as set out in Strategic policy SP2 justified as an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence?

1.2 No. It is not justified as an appropriate strategy as it fails to properly address the reasonable alternatives on the amount of housing need that Winchester should accommodate, and the appropriate spatial strategy that might flow from this. See also our response under Matter 1.

1.3 SP2 sets out a spatial strategy, split along the lines of three spatial areas and collectively delivering c.15,115 homes. The Council acknowledges there are wider unmet housing needs, with the SoCG evidence before the examination suggesting this has always been c.12,000+ homes, and at the point of Plan submission was known to be in the order of c.18,000 homes. The Council also accepts in principle unmet needs should be added to its own Standard Method figure¹, as indeed is required by NPPF para 11b on Plans providing for any needs that cannot be met within neighbouring areas unless: (i) policies in the Framework provide a strong reason for restricting the overall scale, type or distribution of development; or (ii) the adverse impacts of providing for those unmet needs would significantly and demonstrably outweigh the benefits.

1.4 Despite this, in deriving this spatial strategy, the Council has at no point tested and evidenced whether it could – as a reasonable alternative and as required by the NPPF – provide for a different or greater scale of unmet needs and whether the spatial strategy would need to flex, or have been different from the outset, to accommodate that (e.g. to

¹ e.g. SD10g para 3.15

introduce new strategic allocations). In particular, the Council in preparing its Plan has not tested and/or demonstrated any of the following pre-requisites for its current strategy to be sound:

- 1 That there are particular constraints or policies that provide a strong reason for restricting the scale of unmet need addressed, and/or whether the adverse impact of meeting those needs would significantly and demonstrably outweigh the benefits, as necessitated by NPPF para 11b. Indeed, the Council's SHELAA during preparation of the Plan indicated suitable, available and achievable sites with capacity for more than 42,000 homes², none of which have been discounted as reasonable alternative site opportunities (i.e. where development would be fundamentally impossible or inappropriate) as part of the plan process.³ The Council's own evidence suggests there are no reasons to restrict the scale of the unmet needs that should be met;
- 2 That the part solution within Winchester to unmet need suggested by the PfSH process – the SDOA at East of Botley – could not be provided for within this Local Plan⁴;
- 3 That the 'area of search' for development options within Winchester District to contribute to unmet needs from within PfSH is somehow limited to the geographic areas of the District within the PfSH area. (That it could not demonstrate this is wholly unsurprising given the strong north-south transport links that link the centre and north Winchester District to centre of Southampton by the South Western Railway in 15 - 30 mins with similarly strong connections by the Strategic Road Network).
- 4 Linked to 1, 2, and 3 above, that the Council is not obliged to accept the housing needs from neighbouring authorities because it can be demonstrated it would have an adverse impact when assessed against NPPF policies, as required by Planning Practice Guidance⁵;
- 5 That meeting the scale of unmet need that exists from neighbouring areas within Winchester would be neither practical or consistent with achieving sustainable development, as required by NPPF para 35 a);
- 6 That by seeking to meet a different amount of unmet need that it would not have led to the Council pursuing a different spatial strategy. The Council adopted its preferred spatial strategy in September 2021, and subsequently only assessed a single variation of that – Option 1A whereby housing delivery was increased by 2,000 homes – within the IIA, albeit without referring to any unmet needs and why it was not appropriate to test a higher level of development. It has not revisited that position at any juncture since, even when the scale of unmet needs have been reiterated by the evidence (and the implausibility of solutions to address it – e.g. SDOAs – through the PfSH have become ever clearer).

1.5 In combination, in circumstances where it is recognised that there is a significant amount of unmet housing need to be addressed, the Council's plan making process is required by

² See IIA01 para 3.52 and Table 3.9, page 30

³ See IIA SDO2a paras 2.45-2.46

⁴ See EDO2 para 4.14-4.16 for WCC's attempt at an explanation

⁵ PPG ID: 61-022-20190315

policy to leave no stone unturned before it concludes that those needs cannot be met⁶. It has not done so.

- 1.6 In light of these major lacunas in the Council's plan making (and ones with which it must have been aware⁷), the inescapable conclusion is that Policy SP2 cannot be sound. It has not been justified as an appropriate strategy, given the NPPF requirements for Plans to provide for needs that cannot be met within neighbouring areas, except in certain circumstances, none of which have been demonstrated by evidence to exist in Winchester. A positively-prepared spatial strategy would have tested its ability to meet the scale of unmet needs that exist, seeing whether adopting alternative spatial strategies would provide an appropriate strategy to meet the housing needs across the wider Hampshire area.

Q3. Is the proposed distribution of housing and other development supported by the evidence in the SHELAA, settlement hierarchy, and IIA, and will it lead to an appropriate pattern of housing and economic growth?

- 1.7 No. We consider the proposed distribution of housing is spatially unbalanced to the challenge of accommodating the housing needs that exist across the area, and would not represent an appropriate pattern of housing growth.
- 1.8 The District is split by the National Park. The South (PfSH) area of the District is set to accommodate around 8,145 homes; c.54% of the total amount of housing growth over the Plan Period⁸ whilst only accounting for c.35% of the District's housing need or 44% of the District's housing need plus the unmet needs contribution now proposed.⁹
- 1.9 We do not suggest that the proportion of planned growth in each area of the District should automatically align with its existing share of population, nor that the needs arising from one part of the district could not be met within another (indeed, quite to the contrary, it is considered that this could be appropriate – north-south transport connections mean the market areas are not so distinct as to preclude that).
- 1.10 However, what the evidence shows is that even if one were bound by the Council's self-imposed strait jacket of assuming its contribution to unmet needs are limited to its part of the PfSH area (something it has never justified¹⁰) it would still have been possible for the Council's strategy to hypothecate more (perhaps even all) of the growth it plans for the southern (PfSH) part of the District to address more of the unmet housing need that exists within the PfSH area, if it were freed up to do so by delivering more growth to meet the wider needs of Winchester District from the centre and north of the district.

⁶ 'No stone unturned' is the term used by the Inspectors to describe why the Crawley local plan was sound despite leaving unmet housing need – See IR109 at https://crawley.gov.uk/sites/default/files/2024-09/Crawley%20Borough%20Local%20Plan%202023%20to%202040%20inspectors%20report%20-%20final_o.pdf

⁷ Not least by virtue of Reg 18 representations and deputations made by O'Flynn Group to both the Council and meetings of PfSH over recent years

⁸ This is based on SDO1 and the tables contained SP2, paras 13.6 and 14.10 through to 14.198, with the 'remaining rural area' amount assumed to be split evenly between north and south.

⁹ See SDO8h Table 1 where Standard Method housing need for this part of Winchester is recorded as 243dpa, which is c.36% of the total Standard Method housing need for district (averaging 678dpa). Including the unmet needs allowance of 1,900, in total 6,760 (243 x 20 years + 1,900) homes of need within the Plan is associated with the PfSH area (c.44%).

¹⁰ And indeed, given the transport connections of Winchester and Micheldever Station north and south (e.g. within 15-30 minutes of the centre of Southampton) it is plainly illogical to impose that restriction.

- 1.11 And yet for reasons not properly explained, such a distribution of development has not been tested and, therefore, the distribution of housing is not shown to be an appropriate one which properly addresses the needs of the area.

Q4. Have settlement boundaries been defined in accordance with a clear and easily understood methodology that is consistently applied?

- 1.12 No response.

Q5. Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?

- 1.13 No. See our response to Q2 above. The distribution of development has not been considered robustly, because it was considered and identified against a starting point of only meeting the District's own needs, without considering how unmet needs from neighbouring areas might be appropriately addressed within a distribution of development, and balance between the north of the district, and the south (PfSH) part of the district. The 1,900 homes now notionally identified for the unmet need came much later in the process, and only as a residual amount of left-over supply available after the Council had set its housing supply trajectory to meet its incorrectly calculated housing need figure¹¹ (rather than a conscious and robust testing of how much unmet needs might be accommodated – see for example our Matter 4 statement Q4).
- 1.14 The overall housing proposed by the plan is heavily skewed towards the south of the district, with relatively little additional land allocated in the centre and north. There was no justification (at least not one with any coherence or rigour) for why the Council did not either:
- 1 look at how its planned growth in the south could serve a far greater role in meeting the PfSH unmet need by facilitating additional growth in the centre and north of the District to meet Winchester's own needs in a sustainable manner; or
 - 2 look at how sites in the centre and north of the district could make direct contributions to PfSH unmet need (by virtue of strong north-south connections).
- 1.15 Had the Council tested either of these options (assessing alternative distributions of development in the context of the true scale of unmet need rather than only through the lens of its own standard method figure¹²) and then been able to demonstrate that this approach was not consistent with the NPPF when assessed against the terms of para 11¹³ or para 35(a), its submitted plan would have stronger foundations. Absent this, its strategy is built on sand. The Plan cannot be said to be justified as an appropriate strategy. It is unsound against Para 35 b).

¹¹ Incorrectly calculated due to the inclusion of alleged 'over-provision' from a base date of 2020 against a standard method figure in which this level of supply was already taken into account in its market signal uplift – see Matter 4 Question 10

¹² In which its relatively insignificant contribution to PfSH unmet need is a by-product of its chosen housing trajectory and curious application of the standard method to a plan period beginning 2020 (see Matter 3: Question 2) – rather than the product of an overt strategy aiming to address the problem.

¹³ PPG ID: 61-022-20190315

Q6. Would the Plan's spatial strategy strike the right balance between the need for development across brownfield and greenfield sites and any related impact on housing affordability?

- 1.16 The Plan will not deliver sufficient affordable housing to meet affordable housing needs¹⁴. Affordable housing needs from within Winchester are c.56% of the planned provision¹⁵, compared with a proposed 40% affordable housing target for larger greenfield sites and 30% for previously developed land, with small sites <10 dwellings not required to provide affordable housing. Much of the Plan's 'new' supply is tied up in sites that are brownfield (e.g. Sir John Moore Barracks) and therefore a clear consequence for the Plan of the balance between brownfield and greenfield development is that it will deliver even fewer much needed affordable homes. Of course, a greater housing requirement, with greater housing supply to meet it, particularly on large greenfield sites, would much better meet those affordable housing needs.
- 1.17 But affordability is not just about affordable housing.
- 1.18 It ought to go without saying that the supply of housing generally has a direct relationship with the affordability of homes of all types. In that context, although some (not enough) people will obviously benefit from new affordable homes provided by the proposals of the submitted plan, looked at in the round, the strategy of the submitted local plan will overall worsen the relative affordability of homes for people in Winchester rather than improve it.
- 1.19 This is because in circumstances where there is unmet housing need going unaddressed, the demand for housing across PfSH will be greater than supply, including in Winchester. Those with sufficient financial resources (including from outside the District) will be able to access the limited supply in Winchester at the expense of those local residents and newly forming households who have less. Providing less housing than the unmet need therefore erodes any benefit to affordability that might otherwise have arisen from delivering the extra homes necessary to address the affordability uplift in the standard method for the District.
- 1.20 Over time, this means house prices will grow relative to incomes. More people will lose out. Conversely, a plan that properly addresses unmet need (which includes the affordability uplift for those places) will deliver extra affordable homes and help moderate house price growth relative to incomes and improve access to housing¹⁶.

Word Count: 2,332

¹⁴ See SD10g para 3.20

¹⁵ This assumes one is setting aside (as one should not) the large scale of unmet need from within PfSH which includes affordable housing need.

¹⁶ As concluded by the OBR in successive Economic and Fiscal Outlooks based on a range of evidence on house price elasticities in its Working Paper No, 6 Forecasting House Prices 2014. The most recent OBR outlook (March 2025) concludes that increasing supply as per the December 2024 NPPF will reduce house prices by 0.9% by 2029-30 (as well as a host of economic and tax receipt benefits) despite supply only materially increasing in the final two years of the period. It is worth noting that achieving these relative benefits relies on areas like Winchester implementing those reforms as quickly as possible – something best served by withdrawal of the current local plan.