

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 5: Meeting housing need

Whether the site allocation methodology for proposed housing, mixed-use and non-residential site allocations is justified, effective and consistent with national policy?

1.0 Methodology and application

Q1. How have the proposed allocations been identified?

- 1.1 This is a question for the Council to answer. However, from our assessment, the proposed allocations appear to have been identified entirely agnostic of the scale of need pressures that exist, and where or how those need pressures could be suitably accommodated within a spatial strategy that makes allocations across the District.
- 1.2 Drawing on the 'Development Strategy and Site Selection Topic Paper' (SD10b) we make the following observations on the approach to identifying allocations:
- 1 In making allocations, SD10b paras 3.1-4.9 indicates the allocations have only been substantively considered and selected based on quantum of development drawn only from Winchester's own Standard Method needs. Specifically Paragraphs 4.5-4.9 appear to confirm that unmet needs from neighbouring areas were not a factor in deciding on proposed allocations, with the (para 4.5) "*development strategy broadly similar to that in the Regulation 18 draft Local Plan*" which did not at the time make any contribution to unmet needs;
 - 2 The majority of housing supply on site allocations are on sites simply brought across from the existing Local Plan, where the process re-appraised them (SD10b para 5.1). Those were identified pursuant to previous Plan processes.
 - 3 The new allocations (which represent less than 25% of the total requirement) appear, at least in part, to have been determined 'bottom-up' by Parish Councils nominating which sites they wished to see, in accordance with the settlement role/hierarchy (SD10b para 5.5).
 - 4 The council tied its own hands by rejecting at Reg 18 stage the potential for a larger-scale urban extension or new settlement for reasons that in most respects would, on their face, apply more so to the distribution of relatively small allocations in less sustainable villages in the south of the district that the Council has preferred. Even were that choice justified (although we say it was not), its rejection of that strategic

option did not even purport to reach the threshold of justifying why the Council could not meet needs as per the Para 11b tests within the presumption in favour of sustainable development.

- 1.3 This all has the impact that the Plan, in identifying proposed allocations, is mostly drawn from a continuation of the previous plan, plus a relatively small contribution from new locally-identified allocations, which fails to address and answer the bigger and more fundamental questions of how the District can meet and address the unmet housing needs that exist within the wider Hampshire area.

Q2. Do they accord with the Plan’s spatial strategy as set out in strategic policies SP1, SP2, SP3 and H1, H2, H3 and E1-E3, in terms of the overall provision throughout the District?

- 1.4 No. In particular, we consider the allocations as a collective – being generally smaller allocations and relatively more dispersed across many individual settlements - would not meet core objectives on “*development that is focussed around sustainable modes of transport*” (SP1). The location of allocations is imperative to delivering Winchester City Council’s wider aspirations around climate change, creating a greener district and reducing carbon emissions. This is particularly important because transport is the highest contributor to greenhouse gas emissions in the District, by some margin (double that of domestic housing as the next largest contributor).¹
- 1.5 Many of the site allocations are located in locations where the IIA assessments² identify negative performance against such criteria, and at a strategic level neither the allocations (nor in reality the spatial strategy) are focused around delivering homes in locations that genuinely would accord with objectives around reducing the need to travel by private vehicle (e.g. as might be achieved at key underused transport nodes in the District, such as its train stations). The NPPF at para 74 specifically identifies the potential for larger-scale development, such as new settlements, as a means of meeting identified needs in a sustainable way, and yet that option was rejected out of hand earlier in the plan making process (conflated unreasonably with an unpopular urban extension to Winchester, and being the only ‘option’ presented at that time where the specific sites to which that option related were plainly identifiable for respondents³) despite it clearly having a potential to align with that the Council’s purported spatial strategy and address unmet housing needs.

¹ See CN10 – page 4

² See SD10b Section 6 for summary, with IIA1 and IIA2 the key objectives around climate change and reducing transport reliance on private vehicles.

³ Option 3 in the Strategic Issues and Priorities Consultation (CON05) was for a ‘*strategic allocation or new settlement*’. The only two sites at that time which met the criteria to be within that Option were a new settlement at Micheldever Station or the large urban extension, ‘Royaldown’ at South West Winchester. That was widely known public knowledge. This generated many consultation responses against this option, because it could be linked in respondents minds as to what sites it related. By contrast, every other option at the time was not site specific. The negative consultation responses (some related to a new settlement option, some related to a large strategic urban extension option) were then added together – alongside an indication there was no need for large scale development in the District – to reject the entire Option 3 (despite it mirroring the existing spatial approach adopted for West of Waterlooville and North Whiteley). See LPAG Agenda Document 27/09/21 (Page 130 paras 3.16-3.21) <https://democracy.winchester.gov.uk/documents/g2850/Public%20reports%20pack%2027th-Sep-2021%2018.00%20Local%20Plan%20Advisory%20Group.pdf?T=10>

Q3. How were the site boundaries, areas and dwelling/other capacities determined? Are the assumptions justified and based on robust evidence? In particular, are the indicative residential capacities, set out in the Plan's site allocations justified by the evidence and consistent with NPPF paragraphs 123 to 126?

1.6 No response.

Q4. How would the proposed allocations provide flexibility in the event that some sites do not come forward?

1.7 There is no inbuilt flexibility within the allocations no within the wider Plan to address the event that some sites would not come forward. The housing trajectory is currently insufficient to meet the housing requirement itself, let alone provide flexibility (see our Matter 4 statement).

Q5. In addition, for each site allocation the Council should provide evidence to justify their delivery within the Plan period.

1.8 This is for the Council to respond.

Q6. The Council has set out tables relating to housing supply in each of the settlements within the spatial areas in the 'Development Allocations' section of the Plan. In relation to each spatial area, the Council should provide robust evidence to justify the number of dwellings anticipated to be delivered in the Plan period, including net completions, outstanding permissions, windfall allowance, and development equivalents, Neighbourhood Plan allocations, extant Plan existing commitments, and new site allocations.

1.9 This is for the Council to address. However, in general, the Plan and/or its evidence would benefit from a consolidated year-by-year housing trajectory broken down by site/component, with evidence justifying the deliverability and developability of sites within that trajectory (in line with NPPF para 75).

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