

**Winchester City Council  
Winchester District Local Plan 2020-2040  
Examination**

**Matter 5 Site Allocation Methodology**

Word Count - 2998

**KPPC  
Macra Ltd  
April 2025**

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

Methodology and application

*Question 1*

- 1.1 The Council prepared a Strategic Housing and Economic Land Availability Assessment (SHELAA) (2021). This document was originally intended to underpin the WDLP in line with the intention to submit for examination in 2021. This is the only SHELAA document included within the Evidence Base to the Local Plan, however the Council has since updated the SHELAA to a base date of July 2023. The Council should include the 2023 SHELAA within its package of submission documents.
- 1.2 The Council have derived their chosen strategic site allocations from the 'Suitable and Available Residential Sites'.
- 1.3 Within the context of the overarching HELAA, the Council considers that there is a total 'Residential Land Availability to 2039' of 62,359 homes.
- 1.4 The Council have not updated the base year discussed within the SHELAA, which should be appropriately updated. It is not anticipated that this will change materially the availability of sites, however it remains inaccurate at this time.
- 1.5 The Council, through the various assessment stages of the SHELAA have considered the various land parcels and sites and worked through a process of exclusions to reach this overarching figure. Included within this supply, are both smaller and larger sites. The Council has only selected a small subset of these sites, deemed to be available, for allocation.
- 1.6 The SHELAA itself, whilst setting out a high-level list of the sites and providing a list of sustainability criteria in accordance with the Council's Integrated Impact Assessment (IIA), does not reach any clear conclusions on which sites are most suitable and should be taken forwards for allocation. The Council's formal assessment of the sites is set out within the IIA at Appendix F.
- 1.7 The Integrated Impact Assessment (IIA) comprises the detailed consideration of each of the potential strategic sites identified within the SHELAA. The sites have been assessed and scored on the basis of a defined set out objectives and evaluation criteria. The manner in which the evaluation criteria have been interpreted, and applied to the assessment of individual sites, is inconsistent, moreover there are conclusions in respect of sites which we consider to be inaccurate.
- 1.8 With respect to *Land at Mayles Farm, Wickham* (Site Ref. WI24), the IIA reached the following conclusions.

*Excerpt – (IIA) – Appendix 2 – WI24 Mayles Farm, Wickham*

<b>IIA Objective</b>	<b>Score</b>
IIA1: climate change mitigation	Minor negative (-)
IIA2: travel and air quality	Minor negative (-)
IIA4: health and wellbeing	Minor positive (+)
IIA7: services and facilities	Minor negative (-)
IIA8: economy	Negligible uncertain (0?)
IIA9: biodiversity and geodiversity	Significant negative (--)
IIA10: landscape	Minor negative uncertain (-?)
IIA11: historic environment	Negligible uncertain (0?)
IIA12: natural resources	Significant negative (--)
IIA13: water resources	Negligible (0)
IIA14: flood risk	Negligible (0)

- **IIA1**
  - The Council consider that the site scored minor negative due to the site not being within reasonable proximity of a secondary school or railway station.
  - This is the same conclusion reached for all sites within Wickham settlement, given that these services are not catered for within the settlement.
  - In this respect the site is just as suitable for allocation as the selected strategic allocations for Wickham.
- **IIA2**
  - As with IIA1, the site is appropriately close to services and facilities such that there will be no significant bearing upon the need to use a private vehicle to access most day to day facilities.
  - Other services facilities which are not present within Wickham will require use of a private vehicle, which his the same for any site at Wickham settlement.
- **IIA4**
  - The site is not located within an area subject to a high background noise environment and is located in an appropriate proximity of health services and facilities and access to public open space.
  - Insufficient weight has been given to the significant public open space opportunities and sports provision that would be delivered by this site if allocated.
- **IIA7**
  - It will be necessary for many people to travel to their place of work from the site; but once again, this is entirely consistent wit the determination that should be reached in respect of all sites for Wickham.

- IIA8
    - The site will have a negligible impact upon this objective as the land is not proposed to be designated for employment provision and is not in employment use.
  - IIA9
    - It is irrational to conclude that the site will give rise to a significant negative impact upon biodiversity interest. There is no significant interest present on site, the land is of a low biodiversity value, and its delivery for development would provide significant and overriding opportunities for biodiversity net gain (BNG) having regard for the sheer quantum of greenspace that can be delivered by the site.
    - The site should have scored neutrally or minor positively in this regard.
  - IIA10
    - The site does not have any significant landscape sensitivity, as the Landscape Visual Impact Assessment (LVIA) prepared by UBU Design and submitted alongside these representations concludes.
    - The site should have scored neutrally on this point.
  - IIA11
    - The site will not impact significantly upon any heritage assets, and there is only a single Grade II listed dwelling within a reasonable proximity of the site.
    - It is not considered that the significance of this heritage asset will be impacted by the development.
  - IIA12
    - The majority of the site is low value greenfield land, which is utilised for low impact grazing. The land comprises predominantly low grade agricultural land, which is not best and most versatile land.
    - We consider it irrational for the site to have been scored significant negative in this regard.
  - IIA13
    - The site will have a negligible impact upon this objective as it is not located within any groundwater source protection zones.
  - IIA14
    - The site is located outside of any zones of fluvial or surface water flood risk with respect to those areas that will be brought forward for development.
- 1.9 We do not agree with many of the conclusions reached by Winchester Council in respect of the IIA for *Land at Mayles Farm, Wickham*.
- 1.10 It should be noted that almost identical conclusions were reached within the IIA for *Site WI03 – Land at Southwick Road/School Road*, as is reflected within the table excerpt below.

*Excerpt – (IIA) – Appendix 2 – WI03 Southwick Road/School road Wickham*

<b>IIA Objective</b>	<b>Score</b>
IIA1: climate change mitigation	Minor negative (-)
IIA2: travel and air quality	Minor negative (-)
IIA4: health and wellbeing	Minor positive (+)
IIA7: services and facilities	Minor negative (-)
IIA8: economy	Negligible uncertain (0?)
IIA9: biodiversity and geodiversity	Significant negative (--)
IIA10: landscape	Negligible uncertain (0?)
IIA11: historic environment	Negligible uncertain (0?)
IIA12: natural resources	Significant negative (--)
IIA13: water resources	Negligible (0)
IIA14: flood risk	Negligible (0)

- 1.11 *Land at Mayles Farm, Wickham* is no less sustainable than *Site WI03 – Land at Southwick Road/School Road*, which has been formally allocated and supported by Winchester City Council.
- 1.12 There is no appropriate justification or rationale for the exclusion of *Land at Mayles Farm, Wickham* as a strategic allocation on this basis.
- 1.13 The conclusions reached within the IIA for *Site WK5 – Land at Mill Lane, Wickham* are unreasonable and irrational, having regard for the conclusions otherwise reached in respect of both *Land at Mayles Farm, Wickham*, and *Site WI03 – Land at Southwick Road/School Road*. We do not consider that this site is in any manner more sustainable in terms of its proximity to the settlement and services and facilities than the other two sites selected and moreover there are significant negative landscape impacts that would arise from the delivery of this site within an enclosed rural landscape which appears divorced from the settlement, and which would materially change Mill Street to the detriment of the character of this historical route into Wickham settlement from the South Downs National Park to the north. There is absolutely no rationale for scoring the other two sites as minor negative on objectives IIA1, IIA2 and IIA4 and this site as Minor Positive in this regard. This is completely inconsistent and unjustified.

*Excerpt – (IIA) – Appendix 2 – WK5 Mill Street, Wickham*

IIA Objective	Score
IIA1: climate change mitigation	Minor positive (+)
IIA2: travel and air quality	Minor positive (+)
IIA4: health and wellbeing	Minor positive (+)
IIA7: services and facilities	Minor positive (+)
IIA8: economy	Negligible uncertain (0?)
IIA9: biodiversity and geodiversity	Significant negative (--)
IIA10: landscape	Negligible uncertain (0?)
IIA11: historic environment	Negligible uncertain (0?)
IIA12: natural resources	Significant negative (--)
IIA13: water resources	Negligible (0)
IIA14: flood risk	Negligible (0)

- 1.14 The conclusions of the IIA are fundamentally flawed with respect to the sites assessed at Wickham and indeed this assessment has influenced the decisions taken with respect to those sites to select and formally allocate for housing development.
- 1.15 There are significant and material benefits to be derived from *Land at Mayles Farm, Wickham*, which have been ignored, and in particular with respect to *Site WK5 – Land at Mill Lane, Wickham*, the conclusions reached are out of step with the other assessments and irrational.

## Question 2

- 2.1 The allocations identified by the Council accord broadly with the overarching approach proposed to the distribution of development within the plan area. For the reasons set out otherwise in representations however, we consider that the approach taken in respect of Wickham is fundamentally flawed.
- 2.2 The proposed approach to the phasing of development set out within Strategic Policy H2 we consider to be inappropriate having regard for the impending substantial increase in the Council's housing need position that it will need to plan for. To seek to delay the delivery of sites therefore when the Council will be unable to achieve a level of delivery that will be required is in our view nonsensical. This also demonstrates that no regard is given to the length of time that it takes for a major development application to proceed through the development management process and to glean an implementable permission.

Question 3

- 3.1 No comment.

Question 4

- 4.1 There is no flexibility incorporated into the manner in which the Council have identified sites, and indeed if some allocations do not come forwards in the manner anticipated, there will be a shortfall in delivery.

Question 5.

- 5.1 We agree that this evidence must be provided to ensure that the sites identified fulfil the definition of 'deliverable' for the purposes of the NPPF and indeed to justify their allocation and inclusion within the proposed delivery trajectory. Should sites fail to be able to demonstrate this, the Council should be seeking to identify appropriate alternatives.

Question 6

- 6.1 Whilst we consider that the Council has sought to plan broadly for the development needs of the District, we do not consider that the Council has had full and appropriate regard for the direction of National Policy in this respect. The Council has not sought to plan positively for development in a manner that guarantees that the level of development required will meet its objectively assessed local needs, in particular, for housing over the prescribed 20 year period.
- 6.2 The Council proposes that 1,495 homes will be delivered within the plan period by way of 'windfall development'. Having regard for the objectively assessed housing need for Winchester District, which stands at 15,465 homes, approximately 12.3% of the housing need is left unallocated with an indication that this will come forwards on unallocated windfall sites within the plan period.
- 6.3 Winchester Council's approach to windfall development is considered to be evidenced by the '*Assessment of Windfall Trends and Potential (February 2021)*' (*the AWTP*).
- 6.4 Paragraph 72 of the NPPF is clear that where an allowance is to be made for windfall sites as part of an anticipated housing supply, there should be '*compelling evidence that they will provide a reliable source of supply*'. When considering the imposition of a windfall allowance this should therefore be realistic having regard for historic windfall delivery rates and the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA).
- 6.5 With reference to the SHELAA, Winchester Council consider that there are significant opportunities for growth across the plan area; however the majority of these opportunities are located outside of settlement boundaries, which

would require a formal policy change, either through a strategic allocation, or relaxing of settlement boundaries, in order to be deliverable.

- 6.6 With reference specifically to the Larger Rural Settlement of Wickham, all of the available and deliverable sites are located outside of the defined settlement boundary, within the countryside, and thus in locations where a formal allocation would be required to enable the land to come forwards in accordance with the Council's spatial strategy.
- 6.7 Within the AWTP the Council have tabulated the historic rates of windfall completions for each of the Market Town and Larger Village settlements covered by Policy MTRA3 of the Winchester Local Plan Part 1: Core Strategy (2013). With respect to development within Wickham, it is clear that, in general, there are very few windfall completions at all. The overall rate of windfall delivery between 2012 and 2019 is dramatically increased by a single occurrence of the delivery of 40 homes within the years 2015-2016 and latterly within 2016-2017, through the delivery of the development at the former Wickham Laboratories; now Wykeham Court retirement housing development. This was a unique opportunity within Wickham, comprising a lone brownfield development site. There is no realistic prospect of this level of housing delivery coming forwards again within the settlement boundary.
- 6.8 It is very apparent that the rate of windfall development otherwise as expressed within the AWTP, for Wickham settlement, has been virtually non-existent, with a total of three homes delivered across the period 2012-2019.

*Table 7: Net MTRA2 Settlement Housing Completions by type 2012 – 2019 - Assessment of Windfall Trends and Potential (2021)*

Year	Bishop's Waltham		Colden Common		Denmead		Kings Worthy		New Alresford		Swanmore		Waltham Chase		Wickham		Total
	A	W	A	W	A	W	A	W	A	W	A	W	A	W	A	W	
2012 – 2013	0	10	0	0	48	3	0	5	0	-1	0	2	0	4	0	0	71
2013 – 2014	0	2	0	4	32	0	0	14	26	1	0	4	0	0	0	2	85
2014 – 2015	0	31	0	0	0	2	0	5	7	6	0	4	0	0	0	1	56
2015 – 2016	0	0	0	14	0	21	0	4	0	9	0	25	0	1	0	40	114
2016 – 2017	0	50	0	13	0	-1	0	5	0	17	9	56	30	0	0	13	192
2017 - 2018	0	1	0	4	10	4	27	8	0	15	50	7	0	-1	0	0	125
2018 - 2019	0	6	9	1	0	6	23	15	0	19	32	1	77	16	0	0	205
<b>Total</b>	<b>0</b>	<b>100</b>	<b>9</b>	<b>36</b>	<b>90</b>	<b>35</b>	<b>50</b>	<b>56</b>	<b>33</b>	<b>66</b>	<b>91</b>	<b>99</b>	<b>107</b>	<b>20</b>	<b>0</b>	<b>56</b>	<b>848</b>

A = Allocation

W = Windfall

- 6.9 Section 14 of the WDLP sets out the strategy for Wickham settlement, acknowledging its role as a Larger Rural Settlement, and a sustainable location for growth. The housing delivery approach for Wickham comprises two allocations for a total of 100 homes; comprising: *Site WK5 – Land at Mill Lane, Wickham* and *Site WI03 – Land at Southwick Road/School Road*, and alongside this a windfall allowance of 50 homes. It is clear from the historic pattern of delivery within Wickham settlement that the housing delivery which has occurred has been as a result of strategic site allocations; WK2 - Land north of Winchester Road, and WK3 – Glebe Housing Allocation and open



space; indeed this is reflected by the 'Net Completions' and 'Outstanding Permissions' as cited within the table provided in excerpt below.

Table 1. Wickham Housing Sources – Proposed Submission Local Plan (2024)

Wickham Housing Sources	No. of dwellings
Net Completions in or adjoining settlement (2020 - 2023)	118
Outstanding permissions (at 2023) including Local Plan allocations carried forward (Policies WK1, WK2)	88
Windfall allowance	50
New Sites allocated in this Plan (Policies WK5, WK6)	100
<b>Total Provision 2020 – 2040</b>	<b>356</b>

- 6.10 There is no clear evidence that the windfall allowance of 50 homes, which has been allocated to Wickham, will be capable of being delivered having regard for the extant settlement boundary constraints and absence of available brownfield or previously developed sites that could become available during the plan period.
- 6.11 The Winchester City Council Brownfield Land Register (2023) ('BLR') contains no sites at all within Wickham settlement or parish.
- 6.12 There are a number of opportunities, including *Land at Mayles Farm, Wickham (W/24)* which are available and deliverable within the plan period, which should have been formally allocated instead of leaving to uncertainty the delivery of housing required to meet the objectively assessed needs of the district during the plan period.
- 6.13 Having regard for historic patterns of delivery, at Wickham, it is clear that housing delivery is best planned through the formal allocation of sites and that the scope for meaningful windfall development is limited.
- 6.14 As a baseline analysis, the Council's strategy places an unnecessary reliance on windfall sites to meet the provision of at least 15,465 homes across the plan period. The Local Plan does not plan proactively for the delivery of 15,465 homes at all, it plans for approximately 13,570 homes, with the remainder expected to come forwards in a manner that is not positively planned for and offers no guarantee at all of strategic needs for housing being met.
- 6.15 The imposition of a windfall allowance is not in of itself unreasonable, but where there is no reasonable requirement for such a windfall allowance to be included, due to the availability of suitable sites, the Council's approach in this respect is rightly questioned. The Council have not, alongside the imposition of windfall allowances for settlements such as Wickham, considered how or where these sites might come forwards. Indeed, there are simply not the opportunities for that number of dwellings to reasonably come forwards through urban intensification as a result of the tightly drawn settlement boundary and absence of meaningful sized parcels of undeveloped land.

- 6.16 The WDLP as submitted is planning for less than a 15-year plan period, and thus consideration should be given to an increase in housing numbers in any event to properly meet the objectively assessed housing needs and other priorities of the district over an appropriate plan horizon.
- 6.17 This is not a positive vision for the Winchester Council Plan Area. It is a strategy founded in a reasonable degree of uncertainty where reliance upon windfall development accounts for a total of approximately an eighth (12.3%) of the suggested 15,465 homes.
- 6.18 This is inappropriate and runs contrary to the intentions of the NPPF whereby the needs of the plan area should be provided for in order to deliver certainty of housing needs being met. It is important to recognise that the 'housing need' of the plan area as defined by the standard method is not a maximum, but rather a starting point and the Council should be planning to meet local housing needs as a minimum. To rely on windfall development to address this need is not in our view appropriate given the availability of other sites that are capable of being brought forwards to ensure these needs are fully met within the plan period.
- 6.19 The Council's approach does not provide a positive vision for the future of the Plan Area, contrary to Paragraph 15 of the NPPF, this can be made sound through the allocation of additional sites to ensure that the objectively assessed housing need will be met in full.
- 6.20 The proposed spatial strategy for meeting housing needs is not appropriately aspirational in this regard. It does not properly consider opportunities to deliver meaningful levels of growth which will meet the objectively assessed need with the proposed reliance upon windfall development, and with respect to Wickham settlement, does not demonstrate proper consideration having been given to the detailed consultation and engagement undertaken by Wickham and Knowle Parish Council in relation to the opportunities for strategic development at Wickham settlement. The Council has in this regard dismissed the positive and effective engagement undertaken by the Parish Council with parishioners and other members of the public, who have made clear their preferred approach for the growth of Wickham, fundamentally comprising the support for the delivery of *Land at Mayles Farm, Wickham* in preference to the other strategic development opportunities.