

EXAMINATION OF THE WINCHESTER DISTRICT LOCAL PLAN

EXAMINATION STATEMENT ON BEHALF OF CROUDACE HOMES LIMITED

Matter 5 – Site Allocation Methodology

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1. Introduction

- 1.1 This Examination Statement provides a response on behalf of Croudace Homes Limited ("Croudace"), to those Questions raised by the Inspector (dated 24 February 2025), relating to the Stage 1 Hearings of the Winchester District Local Plan 2020-20240 (the Plan) and its supporting evidence base.
- 1.2 This Statement has been prepared by Neame Sutton on behalf of Croudace and specifically looks at the questions and issues raised by the Inspector in relation to Matter 5: Site Allocation Methodology.

2 Matter 5 – Site Allocation Methodology

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

1. How have the proposed allocations been identified?

- 2.1 Winchester City Council has put in place a site allocation methodology, for allocating new housing, that does not appear to have been consulted on at any point of the plan production through informal or formal consultation. A consistent, clear, methodology has not been set out in any Topic Paper or in the Sustainability Appraisal (IIA). The methodology, Croudace has interpreted that the Council has undertaken is shown below, see box 1. The interpretation is a result of the consideration of the

processes set out in Development Strategy and Site Selection Proposed Submission Plan Topic Paper (July 2024).

Step 1: Consideration of allocations in the adopted Local Plan and re-appraised in the SA Framework

Step 2: Consideration of new allocations from Strategic Housing Economic Land Availability Assessment (2021) (updated in 2023)

Step 3: Parish Councils were approached in 2022 and either told they had no choice over site selection or they were asked to reduce shortlisted SHELAA sites down to those preferred for allocation _and respond to WCC with their chosen sites.

Step 4: Parish Councils respond to WCC with their site selection, some of which follow local consultation undertaken by the Parish Council

Step 5: WCC review and re-appraise PC chosen sites, or identify sites which would be allocated, in the case that no sites were chosen by the Parish.

Step 6: WCC consult on sites in Regulation 18 and 19 Plans.

Box 1: Summary of site allocation methodology as interpreted by Croudace Homes Limited.

- 2.2 The issue with this methodology is that there is a limited assessment in the evidence base of suitability, achievability and availability of each site.
- 2.3 The fundamental issue is that Parish Councils are not strategic planning authorities. Parish Councils are not always Neighbourhood Planning groups. WCC asking Parish Councils to undertake such processes (Steps 3 and 4, box 1) without assistance, guidance and legislative and evidenced based methodology is unfair, and not consistent with plan making legislation or guidance. Furthermore, there is a complete inconsistency with approach. Some Parish Councils were unable to conclude or agree on which sites they preferred from the SHELAA shortlist; some Parish Councils were told they had no say; whilst in other cases WCC took an evidence based approach and chose realistic, achievable and available sites. None of this methodology is clearly and succinctly explained in the evidence base to the Plan

2.4 Parish Councils were asked to select sites from the SHELAA (Step 3, box 1). Parish Councils are not equipped to undertake such technical considerations, apparently unaccompanied or supported by WCC Planning Officers. The length, breadth and depth of any consultation undertaken by Parish Council has not been evidenced. For example, there is no evidence from any Parish about:

- How many residences were written to
- Whether any local consultation was supported with social media posts or a dedicated website (for example)
- The content of any consultation letter
- The evidence available about the sites for consideration during the consultation period
- The way in which voting was conducted

2.5 This site allocation methodology is similar to that undertaken by the City Council in the Winchester Local Plan part 2 preparation, which saw the Parish Councils and City Council host joint exhibitions and workshops. In Colden Common, for example, there was also community engagement group tasked with delivering the 250 dwelling target at the time, with employees of WCC. There was a significant evidence base that supported and documents this approach. A similar evidence base is lacking in the approach to the Winchester District Local Plan.

2.6 It is Croudace's opinion that sites specifically chosen by WCC (such as Policy WK6) are based on an informed evidence base, whilst sites chosen by Parish Councils have been heavily influenced by local politics, and in the most, lack a robust evidence base which substantiates their allocation in the plan. That is not to say Croudace believes that all Parish Council chosen sites in the plan should not remain allocated but raises issue that the methodology is at odds with legislation and plan making guidance. It is also a methodology that was not borne out of consultation and has been inconsistently applied, undertaken by untrained and unsupported Parish Councils and, as such, has resulted in a lack of robust evidence base.

An example where the Parish Council approach has failed: Site Specific Comments in relation to Allocation Methodology- Land East of Highbridge Road, Colden Common (SHELAA Reference: CCO3)

- 2.7 Land East of Highbridge Road (SHELAA Reference: CCO3) has not been allocated in the Winchester District Local Plan Regulation 22 Submission Version. It is a sustainably located site in the envelope of the existing settlement of Colden Common and is close to all the village's main services and facilities.
- 2.8 It is a site that was not selected by the Parish Council when the City Council asked it to narrow down the outcome of the SHELAA, which produced 11 sites for Colden Common. There is no technical reason as to why this site was rejected and was chosen through local preference alone. The site is comparable in the IIA outcomes to the proposed allocated sites in Colden Common.
- 2.9 The Development Strategy and Site Selection 2024 Topic Paper includes the email response from the Colden Common Parish Council which confirms that there is no technical reason, rather a deemed landscape sensitivity.

"Taking into account the views of the local community and that CC03 and CC03b are slightly more sensitive in terms of their landscape impact, it is considered that a draft allocation for the sites C002, CC04 and CC15 represent a reasonable basis on which to proceed.

The Parish Council conducted an initial site sieve of the Sheela sites which left 6 sites to be considered further. From those 6 sites, 3 were preferred CC02, CC04 and CC15. CC05, CC03 and CC03b were the least preferred of the 6. " (Para 3.65, the Development Strategy and Site Selection 2024 Topic Paper)

- 2.10 There is no record of the views of the local community or who was asked from the local community to attend any events held by the Colden Common Parish Council.
- 2.11 This is rather a disappointing conclusion for the site CC03 given that other sites have landscape sensitivities which is discussed in the Table at Paragraph 6.34 of the Development Strategy and Site Selection 2024 Topic Paper.
- 2.12 This example clearly shows how reasonable, evidenced, achievable and suitable sites, such as Land East of Highbridge Road have been disregarded without a sufficient evidence base by Colden Common Parish Council.

An Example where Winchester City Council's Methodology was adopted:
Land at Southwick Road, Wickham – Policy WK6

- 2.13 The Site Selection Paper for Wickham (November 2024) reviewed six sites for new homes in Wickham and the Land at Southwick/School Road scored the best out of all sites on landscape sensitivity with a score of 8 out of 15 making it moderately sensitive. The selection paper confirmed that development could be accommodated on this site without changing landscape character through the retention as far as possible of the mature trees subject of TPOs and the significant mature hedgerows within and on the perimeter of the site. The Site Selection Paper prepared by Winchester City Council assessed all of the available sites in Wickham against the same methodology and therefore it was considered that a robust assessment of the site was undertaken and thus that there is sufficient evidence to justify the allocation in Policy WK6 for 60 new homes.
- 2.14 It is considered the approach taken to allocate sites in Wickham, with the City Council taking the lead, was more appropriate and resulted in the most sustainable sites being allocated compared to when Parish Councils were asked to select sites.

2. 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?

- 2.15 Croudace is of the opinion that the allocations are consistent with the spatial strategy of the Plan. There are further concerns in regards to quantum of housing the Plan provides and these are detailed under Examination Matter 4, which relates to housing policies H1, H2 and H3.

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

- 2.16 For the reasons set out in our Matter 4 Statement the Council has failed to make sufficient allocations in the Plan and as a consequence there is no provision for flexibility in the event that some sites do not come forward. Further allocations are therefore required in order to meet the minimum housing requirement and to provide flexibility in accordance with the Framework 2023.

6. 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.

- 2.17 This matter is considered in detail in our Matter 4 Statement and the accompanying trajectories. It is noted in the context of Matter 4 that the Inspector has requested further details from the Council on the delivery of sites relied upon in its housing trajectory. This is because the information published to date by the Council is insufficient to enable analysis to take place to determine whether the strategy proposed by the Council is sound.
- 2.18 At the present point in time, and on the basis of the information the Council has produced, the Plan does not provide sufficient evidence to demonstrate that the housing delivery strategy is sound nor that its supply sources meeting the tests of deliverability and developability and, in the case of windfalls, the compelling evidence required by the Framework 2023.
- 2.19 Croudace reserves the right to respond further on any additional information the Council presents in response to this question either in advance of or at the EIP Hearing session.
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