

# Winchester LP Examination

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**Date** 24 July 2025  
**From** Lichfields obo O'Flynn Group

## **Subject Inspector Note 15 (ED37): Comments on ED25 and ED34a/b**

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- 1.1 We are grateful for the opportunity to comment on ED25 and ED34a/b. The documents further illuminate regrettable errors in WCC plan making and confirm fundamental concerns over failure of duty to cooperate and soundness.

### **The Plan Period**

- 1.2 ED34a repeats WCC's arguments about retaining the 2020 start. We do not reiterate previous points on why this is unsound, but note ED34a does not consider or recognise at all that:
- 1 the PPG (2a-011-20190220) explains that the affordability uplift already accounts for past levels of supply; and
  - 2 WCC's 'creative accounting' on its requirement – and its failure to contemplate additional allocations – is not a positively prepared strategy which seeks to meet OAN, taking into account the chronic and worsening position in PfSH confirmed as early as December 2022 (PSH07).
- 1.3 It is also a NPPF requirement (para 22) that strategic policies, including the housing requirement, look ahead a minimum 15 years from adoption.
- 1.4 Obviously, a period ending with the monitoring year in March 2040 would only be 14 years.
- 1.5 It cannot even be the 14.5 years referred to on Day 2 of hearings by WCC's Counsel with reference to Chichester's plan, because that would necessitate adoption by 1<sup>st</sup> October 2025 which is now plainly implausible. The local circumstances cited in Chichester to justify going below 15 years (a boost to housing land supply and mitigation measures for highway issues) have no equivalent here.<sup>1</sup>
- 1.6 ED34 explains that revising the Plan period to 2024-2040 would reduce supply available for unmet needs to just 290 homes. The necessary minimum 15-year period to 2041 means the 290 homes available for unmet needs becomes a shortfall of 271, with zero contribution made.<sup>2</sup>
- 1.7 This contrasts with the 1,900-home contribution the Plan purported to be making on submission, on which SoCGs with neighbouring LPAs were based. It bears no relationship to the scale of PfSH's unmet housing needs.

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<sup>1</sup> [Para 19 of Chichester's ID07](#)

<sup>2</sup> SM need (2024-2041): 17 years x 676 = 11,492. Against WCC Supply (2024-2041): 11,106 for 2024-2040 plus one additional year of 115 windfall = 11,221.

## Trajectory

- 1.8 ED34a presents the housing trajectory with and without phasing, which we have recreated below, overlaid with Winchester's 676dpa standard method figure. This confirms another fundamental failing.
- 1.9 For 2024/25 - 2033/34, with phasing, WCC anticipates delivery at 881dpa, above its annualised requirement, before falling below it from 2034.

### Appendix C: Effect of Phasing on Housing Trajectory

(Updating Table at Page 218 of Proposed Submission Local Plan)



- 1.10 Front loading of delivery is not unusual in a trajectory, but WCC inexplicably ignored the obvious opportunity it presented to apply Occam's razor to positive planning in the 18-24 months of plan preparation up to submission.
- 1.11 WCC could easily have tested an option that met annual need (676dpa) plus an allowance of, say, 200dpa for unmet need (total 876dpa) that it would realistically meet in the first ten years based on existing sites and its small number of new allocations, setting a requirement of 14,016 (2024-2040) against its own need of 10,816, thus contributing 3,200 for unmet need. Further developable sites (drawn from the SHELAA's site capacity of 42,500 homes) – such as one or more strategic allocations from Option 3 in the SIP - could have been allocated for expected delivery in years 6+ of the plan, filling the post-2034 gap, accounting for the lead-in times often experienced on such sites.
- 1.12 This temporal dimension of its trajectory is missing from the Council's assessment of options since 2021.
- 1.13 The 2022 IAA refers negatively to Option 3 larger-scale allocations because any one location "*could only deliver 1,700 during the plan period*". Yet had WCC explored the option of adding just two such developments (say, one each in the north and centre of the district), WCC's DtC discussions within PfSH from December 2022 could have included a positive solution amounting to 3,400 homes. That would have at least attempted to meet

the Act's s.33A requirement to "*maximise the effectiveness of plan preparation.*" The failure to do so aligns with the [Horsham Inspector's findings of failure at 59-60 and 84 of his letter on DtC.](#)

- 1.14 Instead, WCC offered a housing numbers card trick: a requirement pegged to the total of the supply (below totality of unmet needs), deliberately backdated to include past higher supply (referred to by WCC Counsel at the hearings as a "*gift horse*") through which it suddenly purported to be helping with future PfSH unmet need; all without providing any additional allocations. This bears striking similarity with the failure the [Mid Sussex Inspector identified in para 55 of her DtC letter.](#)
- 1.15 With its illusion exposed to the sunlight of examination, the Council's strategy evaporates into nothing.

## **Where does ED34a/b leave the Plan?**

- 1.16 Two conclusions are inescapable:
- 1 Even on WCC's best case, with 14 years post adoption, its future contribution to unmet need is *de minimis*. Over the minimum 15 years it is negative and creating unmet need. This contrasts starkly with:
    - a the 1,900 contribution underpinning SoCG agreements;
    - b the 18,120 unmet need (Table 1 in our Matter 1 Statement)

There is, and always was, suitable land in the SHELAA. Yet, based on what WCC said at the Hearings and ED34a, even now it turns a blind eye to the solution of allocating more land for unmet needs.

Its arrival at this sorry destination is confirmation of S.33A DtC failure.
  - 2 The Plan is not remotely close to being sound against NPPF para 35. WCC had the time, ability and sites to positively prepare for future housing needs, to justify its approach based on reasonable alternatives and evidence, and to effectively work on cross boundary matters that were dealt with rather than deferred to a future plan (as WCC explicitly seeks). The plan makes few new allocations, and those sites can progress anyway under the 2024 NPPF. The Plan's deficiencies require strategy changes that, although within the grasp of WCC in the years up to 2024, cannot now be fixed within six months; proceeding would breach the ['pragmatism' provisions outlined on 30<sup>th</sup> July 2024.](#) The only logical conclusion is to recommend that WCC withdraw its Plan.