

LOCAL PLAN ADVISORY GROUP

Wednesday, 8 March 2023

Attendance:

Councillors
Porter (Chairperson)

Learney
Tod
Edwards

Evans
Horrill
Read

Apologies for Absence:

None.

Video recording of this meeting

1. **APOLOGIES**

There were no apologies.

2. **DISCLOSURE OF INTERESTS**

Councillor Porter declared a non-pecuniary interest concerning items on the agenda that may be related to her role as a County Councillor.

Councillor Tod declared a non-pecuniary interest concerning items on the agenda that may be related to his role as a County Councillor and that he was a council-nominated member of the Partnership for South Hampshire (PfSH) Joint Committee.

3. **PUBLIC PARTICIPATION**

No requests had been received although the Chairperson noted that correspondence had been received from Lichfields, the planning consultants acting for the O'Flynn Group, and the promoters of the land at Micheldever Station, which would be discussed as part of the main agenda item.

It was agreed following the meeting that the correspondence be appended to these minutes.

4. **COUNCILLOR PARTICIPATION FOR NON-LPAG MEMBERS.**

No requests had been received.

5. **MINUTES OF THE PREVIOUS MEETING HELD ON 9 MARCH 2022**

RESOLVED:

That the minutes of the previous meeting held on 9 March 2022 be approved and adopted.

6. **LOCAL PLAN UPDATE - REGULATION 18 CONSULTATION**

Adrian Fox, Strategic Planning Manager, provided members with a presentation that had been made available in advance of the meeting and was available here. He began by thanking everyone who had contributed to the Regulation 18 Local Plan consultation, particularly parish and town councils, council members, local groups, and organisations.

The presentation provided an overview of the progress made, including stakeholder engagement, and potential development sites, it addressed the known challenges such as affordable housing, economic growth, and environmental protection. The presentation included maps and diagrams showing development sites and growth distribution and it outlined the timeline and next steps, including public consultation and the Local Plan examination.

The committee proceeded to ask questions and debate the presentation, and in summary, the following matters were raised.

1. Concerns were raised regarding the alignment with neighbouring authorities' plans, for example at West of Waterlooville with Havant Borough Council.
2. Officers were asked to clarify housing numbers and whether the Lichfield letter made current assumptions unsound.
3. Whether a backup plan existed for the Regulation 19 timetable if the PfSH deadline was not met.
4. Clarification was requested on consultation areas selected and suggestions for future event areas.
5. A progress update was requested on the allocation of 500 homes in the South Down National Park.
6. The council's approach to phosphates and nitrates in the local plan process was questioned.
7. Further clarification was requested on phasing, including the "Brownfield site first" approach.
8. An update was requested on consultation with young people in the district.
9. Reassurance was requested regarding the progress on Sir John Moore Barracks and the fulfilment of housing assumptions.
10. The Chairperson and officers were asked to consider keeping LPAG members informed of developments.

These questions were responded to by Councillor Porter, Cabinet Member for Place and Local Plan, Councillor Tod, Leader and Cabinet Member for Asset Management, Adrian Fox, Strategic Planning Manager, and Dawn Adey, Strategic Director.

Following questions and responses, Adrian Fox summarised the next steps as follows.

1. The council would be reviewing, responding to, and processing all representations.
2. The council would be updating its evidence base, including its employment and retail study.

3. Officers were working with Hampshire County Council to examine the cumulative impact of site allocations on the highway network.
4. The council was in communication with universities regarding student numbers.
5. The statement of community involvement and SHELAA would be reviewed.
6. The Regulation 19 Local Plan required approval from both Cabinet and Full Council before submission to the local plan examiner.

The meeting commenced at 6.00 pm and concluded at 7.00 pm

Chairperson

Members of the Local Plan Advisory Group
Winchester City Council
The Guildhall
City Offices
Colebrook Street
Winchester
SO23 9LJ

Date: 6 March 2023

Our ref: 15877/01/MS/26367060v1

Your ref: Local Plan Advisory Group

Dear Member of the Local Plan Advisory Group

Winchester Local Plan Update

We write ahead of the meeting of the Local Plan Advisory Group (LPAG) on Wednesday 8th March at which you are receiving a presentation on the Local Plan Update. We are instructed by O'Flynn Group, which is promoting land at Micheldever Station for a New Hampshire Town.

We should be grateful if you could accept this letter as a written statement under item 3 of the Agenda and give it due consideration as you contemplate the way forward for the Local Plan.

Having reviewed the Local Plan Update presentation prepared by your officers, we believe there are three matters where circumstances have changed since the Council settled on the spatial strategy advanced in its Reg 18 Consultation in 2022, and which could lead to that approach being found unsound if submitted for examination.

Respectfully, we do not believe the full implications have been fully ventilated in the otherwise excellent material put before you. They lead us to conclude that, at the very least, the Council should revisit whether the strategic options that it has previously rejected require genuine reconsideration.

The three matters are:

- A. Unmet Housing Need
- B. Sir John Moore Barracks
- C. Phosphorous and the River Itchen Catchment

Our consideration of each is set out below to assist LPAG members.

A. Unmet Housing Need

The Local Plan Update presentation makes no reference to the question of unmet housing need. In our opinion, this must surely be one of the principal risks to the soundness of the current strategy.

Members of LPAG will be aware of the latest (2022) iteration of the Statement of Common Ground (SoCG) produced in November for the Partnership for South Hampshire (PFSH). It states that:

- 1 The latest evidence finds an unmet need of some 20,000 dwellings up to 2036 in South Hampshire.
- 2 Some of this unmet need is because housing needs have increased (in part due to the 35% uplift in Southampton under the Standard Method, albeit this is only a quarter of the total) but also because there is less housing capacity on identified land in the PFSH area than previously estimated.
- 3 One of the reasons for less capacity is because 1,859 homes on committed sites in the PFSH part of Winchester that had previously been earmarked by the City Council to address South Hampshire's unmet need are now being offset by against needs generated in Winchester District, in the centre and north of the district.
- 4 The Strategic Development Opportunity Areas (SDOAs) being explored by PFSH to address unmet need will not be sufficient to deal with all of it.
- 5 There is a challenge to find suitable sites and that the officers' group is reviewing the process to find

potential additional and alternative ways to accommodate the growth required.

The implications are obvious. If the City Council has taken 1,859 of capacity 'off the table' and is indicating it is unable to help its neighbours with unmet need at all, it will need to be able to show in its Local Plan that it has left 'no stone unturned' in terms of providing sites elsewhere in the district.

At face value, this looks to be difficult because:

- 1 The emerging strategy of the new local plan is very much focused on providing housing in the south of the district. In addition to the 5,700 homes committed or proposed in urban south Hampshire, the Council is proposing to allocate hundreds of homes in rural southern parishes, but none of these are being used to address unmet need; they are all taking the strain of Winchester's own need;
- 2 At the same time, the City Council has – in its emerging plan – rejected alternative options for development in the centre and north of its district. This includes, but is not limited to, our client's proposals for a New Hampshire Town at Micheldever Station. It is no answer to say that these lie outside the PFSH area, because:
 - i Indirectly, these options could have helped 'free up' the capacity of sites in the south of the district and enable that capacity to become available to address some of the PFSH unmet need, when currently those sites address none of it.
 - ii Directly, sites in other parts of the district could also have a role. For example, our vision for Micheldever Station includes working with the rail system to improve southern

connections so that people can live within a ten-minute walk of the station and commute south to urban south Hampshire on fast, direct trains. A location like that could immediately be an option for those whose working life is south Hampshire-based. Indeed, a rail-based new settlement is probably a more sustainable option for commuting than placing ever more development in southern parish villages with poor public transport.

At some point soon, the PFSH will likely conclude that there is residual unmet need that authorities in and surrounding the PFSH area will need to address; it does not seem to us that Winchester City Council currently has an adequate answer to why it should not make specific provision for it.

B. Sir John Moore Barracks

One of the few new allocations made in the emerging Local Plan is Policy W2 for 900 homes on the John Moore Barracks site, which is predominantly open countryside. This has already been pushed back to 2026 and there are some suggestions that recent events in Ukraine will cause the DIO to reevaluate its need for the site.

At the very least, it gives rise to questions over the flexibility of the Plan strategy in the event the DIO release of the site is either abandoned or further delayed. The loss of this site from the housing trajectory (or further delay) would create a gap in the housing supply and leave the centre and north of the District making even less contribution to the district's housing needs.

C. Phosphorous and the River Itchen Catchment

The Local Plan Update presentation correctly identifies the nutrient issue as one that will need to be addressed by the Council. The PFSH report on the issue on 5th July 2022 found (para 5.2) that, on phosphorous issues specifically:

“Although PFSH planning officers have a good understanding of how phosphate mitigation could be provided, the spatial relationship between development and the River Itchen Special Area of Conservation means that the area available for strategic mitigation is considerably constrained. As a result, there is the potential for a strategic solution to take considerably longer than 18 months to achieve. Finding a solution for phosphate neutrality in the Itchen catchment is currently a key focus of work for the Strategic Environmental Planning Officer. However, there will be a clear impact, particularly in Eastleigh and Winchester, on new housing delivery.”

The Local Plan Update presentation indicates the Council will “be contacting site promoters that have their sites allocated in the Reg 18 LP and asking them [to] demonstrate the deliverability of their sites and how they intend to address nutrients.”

The clear implication here is that the Council currently has no assurance that its current strategy focusing a significant amount of its development within the River Itchen catchment will not find itself severely compromised by the extra time it will take to arrive at a viable mitigation solution for the nutrients issue. Sticking with the current strategy could either severely delay the Reg 19 Plan or lead to a strategy that unravels at Examination.

The way forward

In combination, we consider the three factors above pose real challenges for the current Local Plan strategy; ones that – to be fair to the Council – were not as severe when it settled on its current

approach. We consider that they warrant the Council giving serious reconsideration of site options that it rejected in 2021 after its Strategic Issues & Priorities consultation.

While the spatial choice for the plan is ultimately a matter for the Council, there is an obvious solution to the three problems hiding in plain sight, and that is a new settlement option at Micheldever Station. The site is available to provide up to 6,000 homes and employment opportunities as part of a mixed use, sustainable new Hampshire Town centred on a rail station. It sits outside the River Itchen catchment and has a large area of wider land within the wider Sutton Scotney Estate. It thus has no constraints in terms of nutrient challenges. Situating development at Micheldever Station protects the historic city of Winchester from the need for further extensions.

Micheldever Station was lumped in alongside the Royaldown site as part of the Strategic Issues and Options consultation and the combined option was rejected by the Council for a mix of reasons, including a view that it was not needed because the housing target did not justify it (a point that did not take account of the unmet need situation). The report on the Homes for All consultation says it attracted 373 objections from local residents, but this no more or less than one would expect for any comparable proposal (for example, in 2011 the planning application for Barton Farm on an allocated reserve site was approved despite attracting over 600 objections). Other reasons given in the Council's evidence base for rejecting the concept in 2021 cited factors that, respectfully, could apply to any new settlement proposal that has been successfully allocated and delivered across the UK over the past 20 years, including Welborne Garden Village.

The evidence of the Council has not, in our view, adequately explored the potential of the Micheldever Station site to support a balanced approach to development in the district in light of the new challenges facing the plan.

There is another way. In addition to the work the Council will rightly do with site promoters on its current allocations, it would be prudent for LPAG to request that its officers give further consideration to whether the current strategic approach of the local plan is likely to be robust when challenged at Examination. It would be sensible, in our view, to revisit whether there is a 'Plan B' that would better enable the plan to progress.

Yours faithfully

Matthew Spry
Senior Director, Head of London Office

