

Winchester City Council (WCC) has indicated comments may be made either on their Schedule of Modifications which have been prepared following representations made to the pre-submission version of the Plan or in the light of the publication of the National Planning Policy Framework (NPPF) in March.

My representation on the pre submission local plan argued for the inclusion of an allowance for windfall developments as a source of supply for housing over the 20 year plan period because of local circumstances including Winchester's landscape setting and 40% of the District being within the South Downs National Park.

Since then the NPPF has been published and in paragraph 48 permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. It requires the allowance to be realistic and have regard to historic delivery rates and expected future trends. For some unexplained reason it excludes residential gardens which WCC acknowledge have been a source of windfalls in the District.

In Background Paper 1, Housing Provision, Distribution and Delivery, WCC has made an allowance for windfalls in accordance with the guidance of paragraph 48 of the NPPF and I agree with the reasons they give for doing so. Where I disagree with them is the number of windfalls to plan for over the 20 year period. In the table in Appendix C they show a figure for windfalls for the District over 15 years of 1,378. This differs significantly from the numbers shown earlier in the Paper.

WCC's figures for windfalls built over previous years are set out in the table on page 58. In one column headed 'All not specifically identified completions' are the figures for all windfall sites including those built on residential gardens and then another column for windfalls excluding gardens. WCC give the average annual figures over 5 years for windfalls excluding those built in residential gardens, as 171. There are arguments for making projections based on the higher figures in the column which includes those built on residential gardens which I set out later in this representation.

Having calculated a figure of 171 p.a. for windfall houses, WCC then show a much reduced number of windfalls in Appendix C of 1378 which produces an average annual rate over 15 years of 92. They first show all the commitments and strategic allocations and then include a reduced number of windfalls to achieve the required total of 11,000 houses over 20 years. I contend the windfalls should be calculated first, should be significantly higher than that shown in this appendix and should be taken into account before accepting the amount of housing proposed for the strategic allocation at North Winchester.

WCC have stated no windfalls should be allowed for during the first 5 years of the plan period. While it is right to take into account that permission for housing classified as windfall will already have been granted for the first few years of the plan period and therefore already included in the figure for commitments, no reason is given for assuming no further windfalls will be delivered during the first 5 years of the period and this seems excessive. A period of 3 years seems more realistic and so 17 years for the whole plan period should be used to predict the number of windfalls likely to be built.

Using WCC's average of 171 windfalls pa, over 17 years this gives a total of 2907 houses instead of the figure of 1378 shown in the table in appendix C.

The totals for windfall housing given so far are for the whole of the District. In assessing the need for a strategic allocation at North Winchester, then the amount of windfall housing expected in Winchester itself needs to be considered. WCC have assumed this to be 36% of the total and this is based on the proportion of the District's population which live in Winchester. It would be possible to research the windfall housing built within Winchester over previous years to see if this is an accurate proportion and this exercise should be carried out to ensure predictions are as accurate as possible. But for now if 36%

is accepted, then the proportion of windfalls allocated to Winchester at 36% of 2907 would be 1046 over 17 years.

The total amount of housing allocated by the Local Plan to Winchester Town over the 20 years is 4000. Part of the supply of housing for Winchester is set out in the Background Paper at page 40 para. 5.29. In addition should be added 200 houses for the permission now granted on the Local Reserve site at Pitt Manor and 1046 for windfalls in Winchester. This shows a need for a reduced number of houses at Winchester North to achieve 4000 over 20 years as follows:

Existing permissions and SHLAA sites	1207
Pitt Manor	200
Windfalls	1046
Winchester North	<u>1547</u>
Total	4000

There is a strong argument for predicting more windfall housing than the total of 1046 as stated by WCC in the section on Windfalls in their Paper. This gives the compelling evidence required by para 48 of NPPF and in looking to the future they give three reasons for predicting more windfall sites will become available on page 59, including houses built in residential gardens. Nevertheless the NPPF provision about excluding this source has to be considered.

No reason is given in the NPPF for excluding housing built on residential gardens appropriate and I contend it is not an absolute bar to including this source of supply. The status of the NPPF has to be taken into account. It is guidance for those drawing up local plans and a material consideration in determining planning applications (para 13). But the NPPF also states in para 10 that plans and decisions need to take local circumstances into account so that they respond to different opportunities for achieving sustainable development in different areas. It can be argued that if there is a conflict between para 10 and para 48, then para 10 can be given greater weight if the local circumstances are sufficiently significant.

The relevant local circumstances include the characteristics of Winchester as a historic and compact city, the importance of its landscape setting and the proximity of the South Downs National Park and all these are acknowledged by the Local Plan as important. All these are reasons for minimising greenfield development and encouraging well considered development within the existing town boundary and therefore including housing on residential gardens.

So, if windfalls built on residential gardens are taken in to account, then the higher figures given in the first column on page 58 can be used. Over the last 5 years these amount to a total of 1671, an average annual figure of 334. Over 17 years this gives a total of 5678. Allocating 36% of this total to Winchester Town produces 2044. When combined with the other sources of supply it reduces the amount required from Winchester North or another greenfield site to 549. The figures are as follows:

Existing permissions and SHLAA sites	1207
Pitt Manor	200
Windfalls	2044
Winchester North or another site(s)	<u>549</u>
Total	4000

Planning for future needs can never be certain so flexibility is required. By looking at two possible totals of housing supply from windfalls, a range of policies for housing supply should be included in the Local Plan. From one end of the spectrum there could be a need for greenfield sites for housing of about 550 units. It could be said that these would not require a strategic allocation in this plan. At the other end of spectrum, there could be a requirement for significantly less housing than 2000 units, say 1550. This could be provided on one large site as presently proposed or more but smaller greenfield sites adjacent to Winchester's boundaries.

Actions and Changes Proposed

1. Examine all windfall completions over the last five years as a minimum period to calculate what total derive from Winchester Town. This will reduce lack of knowledge about the source of windfalls in the past and help improve the accuracy of predictions of the number likely to be built in the future.
2. Plan for the possibility that less than 2000 houses will be required to be built on the Winchester North greenfield site.
3. Make provision for the possibility of other smaller greenfield sites on the boundaries of Winchester coming forward through Local Plan part II which could reduce the amount of development at Winchester North or even eliminate the need for it to be a strategic site in this Plan.

John Beveridge
Compton Road
Winchester SO23 9SL
E mail: [REDACTED]

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