

Winchester District Local Plan Review
Analysis of Representations on the Revised Deposit Plan

Issue: 6.1
General – Paragraph 6.3 to
Proposal H.4

Representations:

Objections:

Redrow Homes (474/4) (474/5) (474/6) (474/7) (474/8) (474/9) (474/10) (474/11) (474/12) (474/13) (474/14) (474/15) George Wimpey (2297/3) (2297/4) (2297/5) (2297/6) (2297/7) (2297/8)

Object to the Housing Chapter, in particular, the housing strategy; Policy framework and development in built up areas.

The Plan puts a disproportionate weight on the need to utilise previously development land at all costs, irrespective of location. This is contrary to PPG3.

Object to the overoptimistic figures in H.1 and provide a detailed critique of the figures which shows that the Local Plan Review fails to meet the approved Hampshire County Structure Plan requirement for the period up to 2011.

The land at Albany Farm, Bishops Waltham can accommodate development and help meet the Structure Plan requirement.

Change Sought: *Not Specified.*

(Other issues raised by the objector covered under H.5 – H.10)

City Council's response to representation

The housing strategy adopted by the City Council and enforced through the Local Plan seeks to identify and permit development on previously developed land over the loss of greenfield land for residential development. This approach is in compliance with government guidance, with the revised PPG3 seeking to:

'... promote more sustainable patterns of development and make better use of previously-developed land, the focus for additional housing should be existing towns and cities.' (*paragraph 1, PPG3*)

In an attempt to promote development on previously developed land the City Council undertook a Urban Capacity Study to identify potential land for development within the existing built up areas and villages across the district. The supply of Urban Capacity Sites (UCS), housing allocations and windfall sites will provide enough capacity for the City Council to meet its strategic requirement and resist the need to allocate greenfield land for development. Details of the source of supply and outstanding requirement are provided under Issue 6.7.

It is not considered necessary therefore to allocate land at Albany Farm for residential development. The site-specific reasons for this are addressed under Issue 6.12 of the 'Responses to Representations on the Deposit Plan' document.

Change Proposed – none

Issue: 6.2 (Deposit 6.2)
RD06.01
(Paragraph 6.03)

Representations:

Objections:

Hawthorne Kamm Ltd (374/7) ,Bewley Homes (386/5), Byngs Business Development LTD (431/1), Linden Homes (446/2), Bryant Homes (397/2)

The Revised Deposit Plan includes completion figures to 2001, whereas the Housing Monitoring Report (published simultaneously) includes figures to 2002.

Change sought – Update paragraph 6.3 with completion figures to 2002.

City Council's response to representation

With the outstanding strategic requirement and the sources of supply changing on an annual basis following completions, it is not considered appropriate to continually update the figures within the Housing Chapter. The 2001 figures contained within the Revised Deposit provide a clear indication of what is needed to be achieved over a 10-year period up to 2011.

Annual updates on the rate to which the City Council is achieving its strategic requirement have been, and will continue to be, provided in the Housing Monitoring Reports, produced on an annual basis. Details of the progress to meet the strategic requirement have been provided under Issue 6.7.

Change Proposed – None

Issue: 6.3 (Deposit 6.2)
RD06.02
(Paragraph 6.04)

Representations:

City Council's response to representation

The MDAs are a strategic measure to meet housing needs across the County: south-east Hampshire in the case of West of Waterlooville. If a shortfall in provision at West of Waterlooville does occur, there is likely to be adequate land available within other south-east Hampshire Districts to meet needs in that particular

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Objections:

geographical region of the County.

**Hawthorne Kamm Ltd (374/8),
Byngs Business Developments Ltd
(431/2), Linden Homes (446/3), Bryant
Homes (397/3), Bewley Homes (386/6)**

The assumption that the West of Waterlooville MDA will deliver 2000 new dwellings in the Plan period contrasts the Strategic Planning Authorities '2003 Policy H4 Monitoring Paper'.

Change Sought:

On the basis of a realistic review of the likely level of completions at the West of Waterlooville MDA in the Plan Period, which is unlikely to yield more than 1,600 completions in Plan period, allocate additional sites to address the resultant shortfall.

The fact that the MDA falls within Winchester District is solely through the location of administrative boundaries and as such the District Local Plan must facilitate the development. Although the West of Waterlooville MDA could yet provide 2000 dwellings within the Plan period, it is accepted that this is becoming increasingly unlikely. Therefore, in line with the Strategic Authorities' H4 Monitoring Report, as of April 2003, it is considered appropriate to reduce the projected completion figure for the MDA from 2000 to 1600 by 2011. However, even if the shortfall needed to be made up within Winchester District it can be met through existing allocations and UCS sites, in addition to windfall sites coming forward during the Plan Period. Details of the source of supply are contained under Issue 6.7 in response to the representations on Table 1 of the Plan.

Change Proposed - None

Issue: 6.4 (Deposit 6.6)
RD06.03 & RD06.04
(Paragraph 6.06 Paragraph 6.07)

City Council's response to representation

Representations:

The support is welcomed.

Detailed responses to current housing requirement and sources of supply are provided under Issue 6.7.

Support/Resolved/Withdrawn:

Change Proposed - None

Cala Homes (South) Ltd (468/27)

Support the identification of Barton farm as the site for the proposed reserve MDA at Winchester City (North).

Change sought – none

**The House Builders Federation
(Southern Region) (266/2)**

Support changes made to RD06.03.

Change sought – none

Objections:

**Hawthorne Kamm Ltd (374/9), (374/10)
Byngs Business Developments Ltd
(431/3), (431/4), Linden Homes (446/4),
(446/5), Bryant Homes (397/4), (397/5)
Bewley Homes (386/7) & (386/8)**

If the West of Waterlooville MDA fails to deliver 2,000 dwellings as part of the Baseline housing provision in the Plan Period, it is illogical for one of the two Reserve housing site to also be at West of Waterlooville MDA. The LPA should include a more thorough statement its 'Plan, Monitor, Manage' approach, taking into account alternative scenarios resulting in a shortfall in housing provision, with clear processes for remedying such shortfalls.

Change Sought:

Additional Reserve sites should be identified to cater for the likelihood that the West of Waterlooville MDA Reserve Site will not come forward during the Plan period.

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Issue: 6.5 (Deposit 6.2)

RD06.05

Proposal H.1

Representations:

Support/Resolved/Withdrawn:

Cala Homes (South) Ltd (468/29)

Support the identification of Barton farm as the site for the proposed reserve MDA at Winchester City (North).

Change sought - none

Objections:

Byngs Business Developments Ltd (431/5), Linden Homes (446/6), Bryant Homes (397/6), Hawthorne Kamm Ltd (374/11), Bewley Homes (386/9)

a) The policy is inconsistent with PPG3 as it does not describe how the release of land will be managed to control the pattern and speed of growth to support a sequential approach to the release of the land. Inadequate sites are allocated, and the Plan over-relies on windfall and UCS sites, and a shortfall in Housing Land Supply against Structure Plan requirements is anticipated.

b) The Plan should include the 2002 Housing Monitoring figures not the 2001 figures.

c) H.1 assumes that the West of Waterlooville MDA will deliver 2,000 dwellings, not 1,600 by 2011 as estimated by the Strategic Planning Authorities.

Object to the reliance on 2 reserve sites given the likelihood of the MDA not delivering the baseline provision.

Change Sought: *Additional Baseline sites should be allocated to meet Structure Plan requirements.*

Update H.1(l) to include housing completions to March 2002.

Identify additional Reserve Sites within or adjoining the more sustainable settlements in the District that could come forward in the Plan period under a 'Plan, Monitor, Manage' approach.

Weatherstone Properties (851/2)

Greenfield sites should be allocated as the assumption that there are considerable development opportunities within Winchester is misconceived.

Change Sought: *That Oliver's Battery land is allocated for housing.*

Christies Hospital School Foundation (833/1), N Fraser (2310/1), G Payne (863/1), Cavendish & Gloucester (2309/1)

The Housing Land Supply:

The local plan housing and supply assessment is misconceived because of the overoptimistic and unrealistic

City Council's response to representation

The support is welcomed.

The components of the housing strategy have been updated to an April 2003 base date and are set out under Issue 6.7. It is not considered necessary to amend the figures within Proposal H.1 of the Local Plan until after the Local Plan Inquiry. The Housing Monitoring Report will provide an annual update of the Council's progress towards meeting its strategic requirement.

The figures contained within Proposal H.1 of the Revised Deposit illustrate the position at April 2001.

The most recent figures show that as of April 2003, of the 7,295 strategic housing requirement to be completed between 1996 – 2011, 3262 had been completed, leaving 4033 to be provided for by 2011.

The response provided under Issue 6.3 concedes that it is now unlikely that 2000 units will be provided at West of Waterlooville by 2011. However, the components of the housing strategy show that, even with this loss, there is still adequate land identified or already granted planning permission to meet the overall strategic requirement. As such it is not considered necessary to allocate further sites to meet the Structure Plan requirements.

Objectors 851, 833, 2310, 863, 2309, 352 reiterate arguments for the allocation of several omission sites for residential development. These issues have been addressed and responded to in the 'Representations on the Deposit Plan' document under the following issue numbers:

Oliver's Battery (Issue: 6.50).

Land at Pitt Manor (Issue: 6.50)

Land at Berewecke Way (Issue 9.8)

Freemans Yard (6.13)

St Johns Croft (Issue 9.4)

Micheldever Station (Issue 6.6 and 12.27)

A detailed response to objections on the reserve MDA at Winchester City (North) is provided in response to objections on the amendments to NC.3 (Issue 12). The Structure Plan is clear that the Local Plan must provide for 'reserve sites' by identifying them and including appropriate policies. A defined site has now been included within the Local Plan for the reserve MDA and, should there be a need for housing in this geographical region of Hampshire, then the site could be triggered for development. However, until such time, the land will remain the subject of policies contained within the Countryside and Natural Environment Chapter of the Local Plan.

The fact that Winchester is a city of historic significance does not preclude it from meeting housing needs. The decision to locate a reserve MDA at Barton Farm was a decision taken by the three Strategic Authorities, and as such the City Council are required to facilitate the reserve site in the Local Plan.

In compliance with government guidance, the Urban Capacity Study undertaken by the City Council has identified a significant number of good opportunities within the existing urban areas to meet the strategic requirement in order to protect the countryside from development.

Should the reserve MDA be triggered for development, appropriate traffic and infrastructure studies would be undertaken as part of a detailed Master Plan in order to protect existing amenities and infrastructure.

The principle of the 'reserve site' is to meet a housing requirement

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contribution assumed from the three main sources of housing land supply (urban capacity, living over the shop and existing commitments and allocations).

Additional greenfield allocations will need to be confirmed to ensure the strategic baseline and reserve housing requirements will be met.

The housing distribution strategy is similarly misconceived as; it is unrealistic and unreasonable to assume 2000 dwellings will be completed by 2011 at the Waterlooville MDA, the Urban Capacity Study exaggerates the contribution likely to be achieved from this source and fails to recognise the constraints of the district (intrinsic heritage significance, the rural character of the district, natural and cultural heritage of the district).

PPG3 guidance should be adopted to address the housing land supply shortfall.

The Housing Distribution Strategy:

Reliance on the urban capacity assessment sites and the existing communities and allocations results in the local plan not containing an explicit housing distribution strategy.

Urgent need to identify greenfield sites other than the proposed MDA's in the Local Plan.

(The objectors suggest a number of sites to be allocated for housing)

Change Sought: *Allocate land at Olivers Battery, Land at Berweeke Way, Freemans Yard and St Johns Croft for residential development.*

G Fothergill (Councillor) (1001/1)

Remove the 'reserve site' for the MDA at Winchester City North as it will be a major intrusion to the greenfield landscape of this area. As long as greenfield sites remain in the Plan the brownfield options are less likely to be taken up. The local infrastructure would have great difficulty in supporting the additional 2000 dwellings at Winchester City North.

Change Sought: *The removal of RD06.05 from the Local Plan.*

Mr and Mrs JP English (1401/2)

Proposal H1 and paragraphs 6.2, 6.3 and 6.4 are based on projected numbers, which undermine planning objectives for the countryside, for transport, and for Winchester. The projected numbers should be absorbed by existing urban sprawls such as Southampton and Portsmouth as Winchester is a historic town, as recognised in the current Regional Planning Guidance (RPG9) and it would be devastated with the development of the Winchester City North MDA.

Change Sought: *The deletion of all references to the Winchester City North MDA.*

should the need appear in a particular area of the County. Dispersing the reserve provision across the District would not necessarily meet this housing need, nor be a sustainable solution. In any event, the Structure Plan dictates that provision must be made at Winchester City (North).

Change Proposed - None

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J Cullen (1413/1)

Development of 2000 dwellings would accelerate the undesirable changes in the city. The increase in road traffic would lead to greater pressure upon parking spaces and lead to increased levels of pollution which are already dangerously high in St George Street.

Change Sought: *Delete all references to Winchester City North MDA as an area of major development capable of accommodating 2000 new dwellings. It is in conflict with other sections of the Plan relating particularly to the city of Winchester and the surrounding countryside.*

M K Charrett (1370/2)

Object to the amended wording of H.1(ii). The Council has sealed the fate of Barton farm by designating it within the MDA. The City Council should demonstrate the real value of Winchester's special character as reflected by studies that have been undertaken (Winchester and its Setting; Future of Winchester Study) and in Hampshire County Council's aim for Winchester to gain World Heritage Status. The principles of 11.1 to 11.5 should be applied to Proposal H.1 and the district as a whole should be looked at to locate a site to build 2000 dwellings.

Change Sought: *Amend H.1 (ii) to read: 'the local Planning Authority will identify a site for a reserve provision of 1000 dwellings of West of Waterlooville and will decide where in the District as a whole, 2000 reserve dwellings can be accommodated if the requirements of the Hampshire County Structure Plan became activated.*

Eagle Star Estates Ltd (352/1)

The reserve MDA at Winchester City North was unsuccessful in the previous Local Plan Inquiry. An Inspector stated, on a proposal to develop land at Barton Farm with 450 dwellings, that '...it (development) would bring the urban edge of Winchester out into the Countryside in what I consider to be an unacceptable manner thereby seriously affecting the setting and character of Winchester and the visual amenities of the area....'

Change Sought: *The proposed allocations for reserve MDAs at Winchester City North and West of Waterlooville are deleted from the District Local Plan Review and further consideration is given to the choice of MDA(s) in Winchester, including a proper evaluation of Micheldever Station Market Town.*

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RD06.06
Paragraph 6.9

Representations:

Support/Withdrawn/Resolved:

**Kingfisher Housing Association
(2312/17)**

The need for continual monitoring is an essential feature of maintaining the focus on maximising the deliverability of small site opportunities. This includes the need for regular re-assessment of the urban capacity study, with an increased focus on the identification and re-evaluation of all forms of supply.

Change Sought: none

Objections:

Cala Homes (South) Ltd (220/1) (468/7)

Cala Homes objects to the limited commitment within the paragraph in regard to the review of the Urban Capacity Study occurring every 5 years, with the 1st being undertaken in 2006. The respondent has identified weaknesses in the existing Urban Capacity Study highlighting the need to review the study regularly. New sources for housing need to be reviewed so that the Local Plan policies and proposals can be based on robust assumptions.

Change Sought: *Given that the housing land supply in the District relies so heavily on urban capacity sites, the Study should be reviewed more regularly (CALA suggests that this should be annually).*

The support is welcomed.

The Housing Monitoring Report produced on an annual basis by the Council provides a more than adequate update on the number and location of sites coming forward for development. The number of windfall sites being permitted on an annual basis is testament to the fact that land not identified within the UCS are continuing to come forward for development.

The first full review of the Urban Capacity Study will continue to be scheduled for 2006, utilising the information produced through the Housing Monitoring Report to provide a review of the sites contained within the document.

The review of the UCS will only identify good opportunities that conform with the policies contained within the Local Plan, and as such, there is no restriction on such sites coming forward for development prior to the review.

Change Proposed - None

Issue: 6.7 (Deposit 6.5)

RD06.07

Table 1: Sources of Housing Supply

Representations:

Objections:

John Hayter (138/20)

There are significantly more "good opportunities" that should be included in the Urban Capacity Study in Table 1. WCC's rejection of these is inconsistent with many that have been included. The UCS is also over stated, primarily because it makes no allowance for sites that will have received planning permission but will be uncompleted by 2011. The rate to which these sites have to receive planning permission and to be completed has to increase significantly.

There is also a significant risk West of

City Council's response to representation

To ensure consistency with the projected numbers within the Local Plan and the outstanding strategic requirement, it is not proposed that Table 1 be amended until after the Local Plan Inquiry has taken place and recommendations from the Inspector are received. However, the Housing Monitoring Report will continue to monitor the progress made in meeting the Structure Plan's requirements and will provide an accurate up to date analysis for the Local Plan Inquiry.

The Housing Monitoring Report will provide in-depth analysis of the housing supply position at April 2003, and the figures provided below respond to representations received on the Revised Deposit Plan

The response to the representations on Proposal H.1 in Issue 6.5 illustrates that as of April 2003, the City Council are required to provide for a remaining requirement of 4,033 dwellings by 2011.

Of those 506 dwellings completed between April 02 and March 03, 166 were on sites identified within the original Urban Capacity Study, 258 on sites allocated within the Local Plan and 82 units completed on 'windfall' sites.

Completions 2002 – 2003

UCS 166

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Waterlooville completions will fall short.
 The Strategic Authority releasing reserve sites would not be a solution.

Allocations	258
Windfall	82
Total	506

The following are approximates to the needed brownfield:
 4 years at 45pa 180
 7 years at 314pa 2198
 2 years at 314pa with planning permission but not completed 628

Following these completions, the remaining sources of supply at April 2003 are as follows:

Urban Capacity Sites	1735
LOTS	79

Approximate minimum Brownfield needed 3006

Allocations including Broadway / Friarsgate	953
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This compares to 2117 in the table 1 at the Deposit Stage.

MDA (West of Waterlooville)	1600
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Change sought – More “good opportunities” to be added to Table 1.

Windfall	484
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Total	4851
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Bishops Waltham Society (212/13)
 Amend Table 1 to include further “good opportunities” of housing supply. (The remaining part of the partially resolved objection reiterates points raised and addressed in response to objections at the Deposit Stage)

This leaves a surplus of 818 over the remaining requirement of 4033 to be provided by 2011.

Change Sought – see Deposit representation 212/13

The Urban Capacity source has been calculated following completions on UCS sites during 2002-2003, and amendments following the granting of planning permission compared to original site capacity estimations. This has reduced the potential supply from 1888 (April 02) to 1735 (April 03).

Bishops Waltham Society (212/15)
 To ensure land is protected from development by this proposal and its predecessors.

It is acknowledged that the 2000 units proposed for the Major Development Area at West of Waterlooville are not all likely to come forward during the Plan Period, and as such the figure has been amended to reflect the H4 Monitoring Report produced by the Strategic Authorities in 2003.

Change sought – The removal of urban capacity sites 36, 37 and 54 from Table 1.

Weatherstone Properties (851/3)
 Object to the Councils failure to acknowledge the particular circumstances within Winchester that will necessarily restrict the supply of housing from within the built-up area and the District. The Councils decision not allocated land at Olivers Battery must be re-examined.

Residential completions on allocations have been accounted for, while the commitments (large sites 10>) have been moved into the ‘windfall’ category to avoid any double counting. This now includes all sites within the District, including those within the countryside, that have been granted planning permission for residential development, other than allocated sites and UCS sites. Also included within the total of 484 are replacement dwellings, where a gain of dwellings is yet to be completed.

Change Sought: Allocate land at Olivers Battery for housing.

The figures show that sites contained within the Urban Capacity Study continue to provide a significant source of housing completions within the District and that, even with the loss of 400 units at West of Waterlooville, there remains a significant surplus to avoid the need to allocate additional sites for development. Indeed, the surplus amounts to 20% of the remaining housing requirement (or 40% of the non-MDA requirement)

The House Builders Federation (Southern Region) (266/3)
 Table 1 refers to an existing commitments and allocations figure of 3,541 dwellings. This is inconsistent with HCC figure of 1,342 for commitments. Adding 2,000 for the Waterlooville MDA would produce a commitments and allocations figure of only 3,342 – difference of 199 dwellings.
Change Sought: explain this discrepancy.

Objector 2314 seeks to promote land at Langtons Farm as an allocated site to meet the baseline requirement. This part of the objection is not duly made as it does not relate to a change from the Deposit Local Plan.

Change Proposed – None

Bovis Homes Ltd (213/1)
 Table 1 underestimates the housing land supply.
Change Sought: Land at North Whiteley and land adjacent to Knowle Hospital should be allocated for housing.

Byngs Business Developments Ltd

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(431/6), Linden Homes (446/7), Bryant Homes (397/8), Hawthorne Kamm Ltd (374/12), Bewley Homes (386/11)

The 'estimated number of dwellings' figures should be updated in line with the Housing Monitoring Report.

Change Sought: *Replace the figures '2,030, 99, 3,541 and 5,670' with '1,888, 99, 3,048 and 5,035 respectively.*

Note that the 'existing commitments and allocations' figure of 3,048 has been reduced by 400 dwellings to reflect the Strategic Planning Authorities' estimate that the West of Waterlooville MDA will only deliver about 1,600 dwellings in the Plan period.

Cala Homes (South) Ltd (468/25)

Object to the continued over reliance on the sources of housing supply identified in Table 1, particularly in the absence of a robust urban capacity assessment.

Change Sought: *none specified*

Westbury Homes (Holdings) Ltd (469/1, 469/5)

Object to the under provision of housing land throughout the Plan period, as set out in the changed Table 1. Over optimistic assessment of housing land supply through Urban Capacity and existing communities & allocations. Current build rates would not produce the required number of dwellings at both MDAs over the plan period.

Change Sought: *amend Table 1 in the supporting text to reflect a more realistic level of housing supply.*

Berkeley Community Villages (2314/1)

Object to the figures in RD06.07 as they rely on the assumption that the West of Waterlooville MDA will be implemented within the Local Plan period which would require an annual build rate of 333 dwellings. The respondent is concerned that the fundamental factor in the deliverability of the MDA within the Local Plan period is the timescale within which it is expected to be implemented, not what is stated in the Housing Monitoring Report. (The respondent provides a breakdown of how they anticipate the delivery of the West of Waterlooville MDA to occur within the timelines proposed in the Local Plan)

Change Sought: *Berkeley propose that a site located at Langtons Farm, New Alresford should be identified as a reserve housing allocation to protect against the shortfall.*

Issue: 6.8 (Deposit 6.5)

RD06.10

Table 2: Estimate of Housing Supply from Allocated Sites

City Council's response to representation

The projected figure for completed development at West of Waterlooville by 2011 has been amended to reflect the figure of 1600 contained within the H4 Monitoring Report. At the present time there

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Representations:

is no reason to doubt that the 1600 will come forward within that period, however this is reliant primarily on the actions of the landowners and developers which are outside the control of the local authorities.

Objections:

Hawthorne Kamm Ltd (374/13), Byngs Business Development Ltd (431/7), Linden Homes (446/8) Bryant Homes (397/9), Bewley Homes (386/12)

Change Proposed - None

Need to confirm whether the Strategic Planning Authorities' estimate of 1,600 dwellings in the Plan Period is reasonably reliable or whether it is too optimistic. Additional sites should be allocated to ensure delivery of the Baseline housing requirement.

Change Sought: none specified.

Issue: 6.9 (Deposit 6.54)

City Council's response to representation

RD06.11

Support is welcomed

Proposal H.2

Change Proposed - None

Representation:

Support/Resolved/Withdrawn:

Environment Agency (253/17)

Support the additional wording.

Change sought-none.

Issue: 6.10 (Deposit 6.61)

City Council's response to representation

RD06.12

Support is welcomed

Proposal H.3

Representations:

Any proposal for residential development within an H.3 settlement is required to be of only one house depth. An application that included backland development would fall outside the requirements of Proposal H.3 and would be contrary to the policy.

Support/Resolved/Withdrawn:

Environment Agency (253/18)

Support the additional wording.

Change sought-none.

GOSE (261/23)

Support the change in RD06.12.

Change sought-none.

The main purpose of the policy is to allow for some growth within the villages, whilst not affecting the overall character of the village. An assessment will have to be taken on a site by site basis as to how much of the land should be included the density calculation, especially if the plot is long and narrow.

By the nature of the policy, applications that would result in backland or tandem development would not be acceptable and as such it is not considered necessary to amend Proposal DP.3.

Objections:

Change Proposed - None

Itchen Valley Parish Council (286/2)

It should be made clear that Backland/tandem development should not occur in Itchen Abbas. It is not believed that the combined effect of the amendment to DP.3(i) and H.3 will satisfy the objector's concerns. The new paragraph DP.3(i) needs to clarify what 'features' includes and to determine what is or isn't appropriate within this area.

Change Sought: Add to the end of Proposal DP.3(i) 'and it will always be appropriate to exclude land from such developable area where backland or tandem development would result'

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Issue: 6.11
Affordable Housing
General and paragraphs 6.34 –
6.41

Representations:

Objections:

Redrow Homes (Southern) Ltd (474/16), (474/17), (474/18), (474/19), (474/20), (474/21), George Wimpey UK Ltd (2297/9), (2297/10)

Proposal H.5 should be amended to reflect the threshold of 25 or more dwellings (or 1.0 ha or more) in Circular 6/98. The Circular's lower threshold of 15 or more dwellings, or 0.5ha or more, should not apply to Winchester. The District is not so constrained that a lower threshold is appropriate or justified. The approach in the Plan is likely to result in an affordable housing deficit, with the provision away from the source of need.
Change sought - not specified.

City Council's response to representation

The Revised Deposit Plan does not contain any changes to the thresholds for sites on which affordable housing is to be sought. The response on issues relating to the provision of affordable housing, and on site size thresholds in particular, is already set out under Issue 6.75 of the Representations on the Deposit Plan.

However, since the Revised Deposit Plan was prepared, a new District-wide Housing Needs Survey was undertaken in October 2002. This provides more up-to-date information on housing needs, and therefore a number of paragraphs within the section on affordable housing will need to be amended to reflect its recommendations.

The Survey includes a minor change to the definition of affordable housing. Although the change is not significant, it is considered that the Local Plan should reflect the up-to-date definition. It also provides new housing need figures, which now need to be reflected in the text of the Local Plan. Changes to the text of paragraph 6.35, which sets out the definition of affordable housing, paragraphs 6.38 – 6.41, and the definition of affordable housing in the Glossary, are therefore recommended.

Paragraph 6.37 refers to current Government guidance on affordable housing, contained in PPG 3 and Circular 6/98. The guidance in PPG 3 is currently the subject of proposed changes, following which Circular 6/98 may be cancelled. Although this guidance is not yet in its final form, paragraph 6.37 should be amended to reflect this, and a proposed change is set out below. The situation may, however, need to be updated by recommending updated wording at the Local Plan Inquiry.

Change Proposed – Paragraph 6.35:

This Plan defines "affordable housing" as "housing provided, with subsidy, for local people who are unable to resolve their housing needs requirements in the private sector local housing sector market because of the relationship between housing costs and incomes.

Change Proposed – Paragraph 6.37:

....advice in Circular 6/98 on Planning and Affordable Housing. Changes to the Planning Policy Guidance Note are, however, proposed, together with the cancellation of advice in Circular 6/98. The draft changes allow local authorities to set lower thresholds where they can be justified. Government advice is that a community's need.....

Change Proposed – Paragraph 6.38:

The need for affordable housing in the District has been assessed in the Winchester Housing Needs Survey, carried out by consultants on behalf of the Local Authority in 1999-2002. This Survey examined the level of housing need in the District during the period 1999–2004, with a projected need to 2006, the mid-point in the period covered by this Local Plan, up to 2011. The Local Authority will ensure that this housing needs information is kept up-to-date, and therefore a Survey update will be undertaken to cover the latter part of the Plan period.

Change Proposed – Paragraph 6.39:

....It identified a net annual outstanding need for 779-1220 new subsidised affordable homes by 2004, which would be likely to increase to 1310 by 2006, which, projected over the period of the Survey to 2011, would result in a total of 7,011 units.

Change Proposed – Paragraph 6.41:

The 1999-2002 Winchester Housing Needs Survey recognises the problem of meeting the high level of need found, and recommends a target of 90 subsidised homes per year. This would amount to 450

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new subsidised homes for the Survey period to 2004. If the annual figure were applied to the whole Plan period (2001 – 2011), this would amount to a target of 900 new subsidised homes, although this figure may be subject to revision when the Survey is updated to cover the latter part of the Plan period. This represents the number of affordable homes that would be needed to prevent an increase in households in housing need. This figure should therefore be a minimum target to be achieved as it falls short of the amount of housing that would be required to address the need for subsidised housing fully in the District, and the substantially increased level of need since the last Survey was carried out in 1999. It therefore recommends that the maximum achievable target level of affordable housing is sought from new developments. To achieve this, it recommends that a higher proportion of affordable homes should be sought within the District than is currently the case, increasing the proportion sought throughout the District to a proportion up to 40%. The City Council has considered this recommendation, and concluded that this overall proportion should be accepted as an average across the District but varied to reflect the different needs of the larger and smaller settlements, and the Major Development Areas, to achieve sustainable developments meeting particular local needs. The 2002 Survey also supports the need to use lower site size thresholds, as used in this Local Plan, which will allow more housing sites to make provision for affordable homes, and ensure a better mix of housing within each local community.

Change Proposed – Glossary:

Affordable Housing:

Housing provided, with subsidy, for local people who are unable to resolve their housing needs requirements in the private sector local housing sector market because of the relationship between housing costs and incomes.

Issue: 6.12 (Deposit 6.81)
RD06.13
Addressing housing need
Paragraph 6.42

Representations:

Support/resolved/withdrawn:

**Kingfisher Housing Association
(2312/18)**

The suggested amendment and implied continued support for the provision of small - scale affordable housing schemes outside existing defined settlement boundaries is welcomed.

Change sought – none.

Objection:

John Hayter (138/14)

Support deletion of Winchester and Whiteley but object to change to “defined and other settlements”. Settlements other than those subject to Proposals H.2 and H.3 would not meet the requirements of criterion (iii) of Proposal H.6.

Change sought – not specified.

City Council's response to representation

The support is welcomed.

This change was included because it is recognised that there may be circumstances where exception sites need to be considered adjacent to recognisable rural communities not defined as settlements in the Local Plan. Any scheme would, however, need to demonstrate that the community concerned had some sustainable elements to support the additional affordable housing, as required by criterion (iii) of Proposal H.6.

Change Proposed – none.

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Issue: 6.13 (Deposit 6.74)

RD06.14

Paragraph 6.44

Representations:

Objections:

GOSE (261/5)

The relationship between the two affordable housing studies, which underpin the Plan's policies, is not sufficiently clear.

Change sought - not specified

GOSE (261/6)

The good practice guidance states that a needs assessment is not on its own sufficient to determine planning targets, either for housing requirements overall or for the affordable component. RPG9 Policy H4 requires the Local Authorities to demonstrate local circumstances and, in particular, the likely viability of developments, if they are minded to adopt a lower site threshold. The proposed targets and thresholds fail to meet these requirements.

Change sought - not specified.

The Executors of E.S Edwards (2285/2)

The objective to seek a proportion of 50% subsidised affordable homes within the West of Waterlooville MDA will stifle development and further exacerbate the implausibility of the Plan's housing strategy.

Change sought - delete changes to Paragraph 6.44 and to Paragraph 12.51.

Kingfisher Housing Association (2312/19)

Generally support changes, but the level of affordable housing provision within the West of Waterlooville MDA should be subject to a more detailed assessment, involving discussions with developers, local authorities and potential affordable housing providers.

Change sought: amend wording to reflect this.

City Council's response to representation

Apart from Denmead, the south-eastern part of Winchester District is relatively sparsely populated and generates only a small proportion of the District Council's local housing needs. Relatively little of the affordable housing to be provided within the West of Waterlooville MDA is therefore expected to meet the District's local housing needs. Most of the affordable housing to be provided within the MDA is expected to meet the needs of the South East Hampshire area including the adjoining districts of Havant Borough, Portsmouth and East Hampshire. A separate housing needs survey of the Waterlooville area was therefore jointly commissioned by the South East Hampshire authorities to obtain a better understanding of localised requirements.

It is considered that the relationship between the Waterlooville and District-wide housing needs surveys can be further clarified to meet GOSE's objection. The text should refer to the District-wide Survey, which recognises that a separate survey for the Waterlooville area has been undertaken. It should also clarify that the Waterlooville survey was undertaken because affordable housing in the MDA will primarily serve the neighbouring local authorities. A further change to the text of paragraph 6.44 is therefore proposed.

Advice from the housing needs consultant is that a 50% proportion would be sustainable within the MDA, as it is proposed to include a large proportion of shared equity housing within that affordable element. In proposing the 50% proportion to be sought in the MDA, the Local Authority has considered local circumstances and needs and an additional viability assessment appraisal has been undertaken to ensure that the development would remain viable with this level of provision. No further change to the proportion of affordable housing is therefore proposed. It is, however, likely that a further viability assessment would be undertaken before the details of the development are confirmed. A change to the text is therefore proposed to reflect this.

The Local Authorities are also committed to a more detailed assessment of need (as set out in Chapter 12: New Communities, paragraph 12.51 as amended by RD12.29). Developers, local authorities and affordable housing providers are already actively involved in this process. No further change is therefore proposed in this respect.

A further minor change is also proposed to paragraph 6.44, to reflect the recommendations of the 2002 Housing Needs Survey. As this Survey does not include a numerical affordable housing target, but indicates instead a target proportion to be achieved, the reference to the District target should be changed to District's needs.

The second part of GOSE's objection is not relevant to the MDA and therefore this is in the process of being clarified with them. Affordable housing provision within the MDA would be on-site and therefore site size thresholds that apply elsewhere in the District would not apply to the MDA. The viability of the proposed thresholds and proportions elsewhere in the District is further addressed under Issue 6.19.

Change Proposed – Paragraph 6.44

...to meet the District's needs. The 2002 District-wide Housing Needs Survey recognises that an additional Survey has also been undertaken for the Waterlooville area, because affordable housing in the MDA will primarily serve the neighbouring local authorities. This A-Housing-Need Survey was undertaken in 2002 on behalf of Winchester City Council and the neighbouring authorities of Havant Borough Council, East Hampshire District Council and Portsmouth City Council. It concludes that a 50% proportion would be justified in the MDA. The

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Local Planning Authority will therefore seek a 50% proportion of subsidised affordable homes within the MDA, subject to further analysis of the viability implications for the development of the site of that level of affordable housing provision.It is unlikely to make a significant contribution to meeting the District's target needs, and not until the latter part of the Plan period.

Issue: 6.14 (Deposit 6.74)
RD06.15
Paragraph 6.45

Representations:

Objections:

GOSE (261/6)

The good practice guidance states that a needs assessment is not on its own sufficient to determine planning targets, either for housing requirements overall or for the affordable component. RPG9 Policy H4 requires the Local Authorities to demonstrate local circumstances and, in particular, the likely viability of developments, if they are minded to adopt a lower site threshold. The proposed targets and thresholds fail to meet these requirements.

Change sought - not specified.

Cala Homes (South) Limited (468/8)

The paragraph refers to 'at least 35%' affordable housing requirement, subject to review should the MDA be triggered. The MDA's 'reserve' status should not defer consideration of the needs, which should reasonably be accommodated on this site. Should an affordable housing need exist, Barton Farm's role should be set out in the Plan.

Change sought - not specified.

Kier Land (2273/2)

The provision of at least 35% affordable housing within the reserve Winchester MDA is unreasonable and unjustified. The appropriate level of affordable housing should be determined when the MDA is triggered, in accordance with the results of an up-to-date housing needs survey.

Change sought - delete reference to 'at least 35% affordable housing' and include statement that affordable housing provision will be assessed when the MDA is triggered, in the light of an up-to-date housing need survey.

City Council's response to representation

Winchester City (North) is a reserve MDA, and therefore it is reasonable for the Local Plan to state that, should the site be triggered, the starting point for assessing what proportion of affordable housing should be sought would be the proportion that applies generally in the District. It is unreasonable for the Local Plan to go further than this at this stage, as any proportion should be based on an up-to-date assessment if and when the site is triggered. The paragraph already refers to the need to review the proportion and for a new up-to-date Survey should the site be triggered. No further change is therefore required to reflect this.

If the site was triggered, the proportion of affordable housing would take account of an up-to-date needs assessment, and an additional viability appraisal would be undertaken as background to the preparation of the Masterplan, as has been done for the West of Waterlooville MDA. No further change to paragraph 6.44 is therefore proposed.

Change Proposed – none.

Issue: 6.15
Addressing the need
Paragraphs 6.46 – 6.50

These paragraphs were not the subject of change in the Revised Deposit Plan, and therefore no representations have been received on them. There is, however, a need for further changes to be made, following the 2002 Housing Needs Survey.

The updated Survey no longer includes a specific target figure for affordable housing, which, in the 1999 Survey, represented a

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minimum level of provision to be achieved. This equated to a figure that would prevent any increase in the numbers currently on the Council's Joint Housing Register. The 2002 Survey identifies a substantially higher level of housing need than the previous Survey, and recognises that it is unlikely to be met within the Plan period. Every effort needs to be made to maximise provision, and this is the aim rather than a specific target figure. No target figure is therefore now included but it is replaced by a target proportion, to seek the maximum possible level of affordable housing from new housing sites.

Changes are therefore recommended to reflect the approach and conclusions of the 2002 Survey.

Change Proposed – Paragraph 6.46:

The Local Authority has therefore concluded that most ~~of the target of 900~~ subsidised affordable homes will have to be provided within or adjacent to the existing settlements.....

Change Proposed – Paragraph 6.47:

....If the Local Authority continued to seek this proportion, it is estimated that ~~fewer than~~ only about 200 affordable homes could be achieved ~~throughout in the remainder of the Plan period, well below the target of 900~~ a very small proportion of the identified need for 7,011 units.....

Change Proposed – Paragraph 6.48:

....It is estimated that this could provide an additional ~~250~~ 300 affordable homes during the Plan period, meeting a significantly larger proportion of the District's ~~target~~ overall need for affordable homes.

Change Proposed – Paragraph 6.50:

Proposal H.5 therefore indicates the Local Authority's intention to negotiate with applicants for housing provision to secure an appropriate proportion of affordable housing on a site by site basis, taking into account the District's ~~target~~ outstanding need for affordable housing and individual site and market conditions.....

Issue: 6.16 (Deposit 6.69 – 6.80)

RD06.16

Proposal H.5

Representations:

Support/ Resolved/withdrawn:

John Hayter (138/7) (Deposit 6.69)
Support amendments to Proposal H.5.
Change sought – none.

Objections:

**Hawthorne Kamm Ltd (374/14),
Bewley Homes plc (386/13),
Bryant Homes (397/10), Byng's
Business Developments Ltd (431/8),
Linden Holding Plc (446/9)**

Thresholds in the larger settlements conflict with advice in Circular 6/98. There is no justification for thresholds in them to be lower than 15 dwellings or 0.5ha, assuming that 'exceptional local constraints' can be demonstrated.

Change sought - redraft Proposal H.5 to include thresholds for affordable housing

City Council's response to representation

The support is welcomed.

No changes were made to the thresholds in Proposal H.5 in the Revised Deposit Plan. The response to issues relating to the thresholds has already been set out under Issue 6.75 in the 'Representations on the Deposit Plan'. None of the changes made conflict with advice in Circular 6/98.

The Revised Deposit Plan defines sites for the West of Waterlooville MDA and the reserve MDA provision. It is therefore appropriate that Proposal H.5 should be amended to require a proportion of affordable housing within those areas. The Local Plan aims to maximise the provision of affordable housing but it is clear that some of the outstanding need identified in the 2002 Survey will remain unmet at the end of the Plan period. It is not therefore necessary to adjust threshold levels in the existing settlements because provision is now required within the MDA(s).

It was always known that some provision would be made at West of Waterlooville, but the Deposit Plan only identified an area of search, within which a site would be defined in the Revised Deposit Plan. It was only at this stage, therefore, that it was possible to establish a requirement for affordable housing within the site, although this would need to meet a sub-regional need, including that of a number of adjoining local authorities in addition to Winchester. This is already set out in paragraph 6.44, which clarifies that provision is unlikely to

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provision in accordance with advice in Circular 6/98.

Turley Associates (868/1)

Amendments conflict with advice in Circular 6/98, are unreasonable, unjustified, unduly onerous and may frustrate affordable housing provision.

Change sought – *amend to accord with Circular 6/98 and underpin by a robust and rigorous assessment of housing need. Justify site thresholds, the proportion sought, expectations in respect of serviced land, financial contributions and the potential role of low cost open market and intermediate housing. Replace with less onerous but realistic provisions.*

Grainger Trust plc (2142)

Circular 6/98 is the relevant advice and should be followed. The West of Waterlooville Housing Needs Survey does not justify seeking 50% affordable housing. This will more than double the existing level of provision in Havant, and this is not justifiable or sustainable. Methods used in the Survey do not conform to Government guidance.

Change sought - *not specified.*

Cala Homes (South) Ltd (468/26)

Object to the suggestion that development at Winchester City (North) MDA will only be permitted if confirmed. The City Council is required to identify a site for it, and the Strategic Authorities identify when 'compelling justification' exists for development to commence. The City Council is seeking to introduce an artificial distinction between the approach to be taken in the 'baseline' and 'reserve' provision.

Change sought - *not specified.*

Kingfisher Housing Association (2312/20)

Object to changes to H.5. The shift in emphasis from a list to 'larger settlements' will create uncertainty and cause problems in the application of policy. Criterion (iii) of the Proposal should be more detailed, informed by the overall design concept for the development, and should not seek to apply a blanket requirement throughout the MDA. The widening of the range of settlements (generally and in terms of the MDA) in criteria (i) and (iii) should be reflected by a shift in the thresholds and requirements of the Proposal for all the settlements.

Change sought - *amend wording to reflect this.*

make a significant contribution to the District's housing needs. In view of this, and the substantial level of housing need in the District, it will not affect the threshold levels specified for the existing settlements.

The response to Issue 6.13 sets out the reasons why the local authority considers the 50% proportion is justified at West of Waterlooville, and that a further assessment would be undertaken before the details of the development are formulated. The proportion sought in Havant is not relevant to the MDA as it will contribute to meeting the wider housing needs of a number of local authorities. The West of Waterlooville Survey is an additional Survey carried out to provide additional information on the MDA's needs. It is referred to in the Winchester District-Wide Survey, which does conform to Government guidance.

It is not considered that criterion (iii) of Proposal H.5 should include any more detail. The Proposal already requires affordable housing to accord with other proposals of this Plan, which would include design requirements. The details of the affordable housing provision are being considered as part of the preparation of the Masterplan, which is being informed by more detailed studies. No further amendment to the Plan is considered necessary.

As set out in the response to Issue 6.45, it would not be appropriate to determine the proportion of affordable housing to be sought at Winchester City (North) at the present time, as it is a reserve MDA. It would only be reasonable to do this if and when the site was triggered.

Government advice in Circular 6/98 makes a distinction between settlements above and below 3000 population for establishing site size thresholds. They must therefore be referred to in the Plan. The change to the Proposal to refer to "the larger settlements" has been made because the number of larger settlements changes over time, and has already done so within the Plan period. It was therefore considered that the most appropriate way of dealing with this would be to list the current "larger settlements" in the text (in new paragraph RD06.17), but to make it clear to applicants that they should check with the Planning Department whether the list has changed at all.

As already set out in the text, the list is reviewed annually. Only one additional settlement was added to the list of larger settlements in the Revised Deposit Plan – Colden Common - and this would not have a significant impact on the provision of affordable housing. It would not therefore justify an overall review of site threshold levels within the settlements.

Change Proposed – *none.*

Issue: 6.17
Applying Proposal H.5
Paragraphs 6.51 – 6.52

No changes were made to these paragraphs in the Revised Deposit Plan, and therefore no representations were received. Changes are, however, needed to reflect the conclusions of the 2002 Housing Needs Survey.

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It is already clear that the substantial level of need exceeds the total number of housing units to be built throughout the District in the Plan period. The aim is therefore to maximise provision, by seeking affordable housing on smaller sites, to reduce substantially the overall housing need in the District. It is not considered necessary to define a minimum numerical target to assist this process, and therefore amendments are proposed to paragraphs 6.51 and 6.52 to reflect this.

Change Proposed – Paragraph 6.51

.....In assessing the proportion of new affordable homes to be sought, the Local Authority has considered the total amount of housing to be provided in the settlements during the Plan period ~~in relation to the target for the provision of affordable housing, and the recommendations of the 2002 Housing Needs Survey. The District will need to accommodate an average of 310 dwellings in total annually in the settlements (excluding the Major Development Area), of which a minimum of 90 units should be affordable to meet the District target. Although this represents just under 30% of the overall housing provision, a higher proportion is needed. This demonstrates that the outstanding need for affordable housing in the District is in excess of the total housing provision expected in the District during the Plan period. The Local Authority's aim is therefore to maximise the proportion of affordable housing sought on sites above the thresholds in Proposal H.5, to compensate for the many smaller sites that are unlikely to provide for affordable housing.~~

Change Proposed – Paragraph 6.52:

The Local Planning Authority estimates that, if the affordable element is to be met in full on the sites likely to come forward during the Plan period, a proportion of 55% would need to be sought on all sites above the thresholds. This excludes provision within the Major Development Area(s). The Authority recognises that this proportion of affordable housing is unlikely to be negotiated, but it will seek the maximum provision possible for each site. The proportions of affordable housing sought are based on the district-wide proportion of up to 40% recommended in the Housing Needs Survey, but they will vary to reflect the different needs of the larger and smaller settlements and of the Major Development Area(s).

Issue: 6.18 (Deposit 6.75)

RD06.18

Paragraph 6.53

Representations:

Objections:

Estates Practice: Hampshire County Council (1434/3), (1434/4), (1434/5)

There is insufficient encouragement for the provision of key worker housing. Paragraph 6.53 should be further amended to provide greater encouragement for key worker housing, as an integral part of the overall requirement, rather than an additional element. Housing for key workers is of great importance to the County Council, and the requirement that its provision should not be at the expense of other housing needs should be deleted from paragraph 6.53.

Change sought – further amend paragraph 6.53 to reflect objection.

City Council's response to representation

There is no change to the section of this paragraph relating to key workers, and this issue has already been addressed under Issue 6.77 of the 'Representations on the Deposit Plan'. No further change is therefore proposed.

It was concluded that the inclusion of the word "usually" in the first sentence of the paragraph was superfluous, and its deletion provides more clarity about the proportion to be sought. It would also be more consistent with Government advice, which requires local plans to provide clarity. It is not considered that it reduces flexibility, as the proportion is sought and not required. The potential affect on viability of sites has been considered in determining the proportion of affordable housing to be sought. No further change is therefore proposed.

Change Proposed – none.

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**Hawthorne Kamm Ltd (374/15),
Bewley Homes plc (386/14), Bryant
Homes (397/11), Byng's Business
Developments Ltd (431/9), Linden
Holdings Plc (446/10)**

The deletion of the word 'usually' creates less flexibility in the proportion sought.

Change sought - retain 'usually' to allow negotiation where necessary.

Bovis Homes (213/3)

The proposed change reduces the flexibility to provide less than 35% affordable housing within larger settlements.

Change sought – re-introduce deleted text.

Cala Homes (220/2)

Oppose the deletion of the word 'usually', as it means that the 35% proportion will now be sought universally. The provision of 35% on all sites, together with other elements of the policy relating to financial controls, will threaten the viability of otherwise acceptable developments, particularly on brownfield sites.

Change sought - not specified.

Issue: 6.19 (Deposit 6.79)

RD06.19

Paragraph 6.56

Representations:

Objections:

John Hayter (138/18)

Welcome the addition of "seek appropriate financial contributions" but dwellings should be made available "at an affordable price" rather than "to meet local needs".

Change sought – amend wording to reflect this.

Cala Homes (220/3)

By adding 'serviced' to the free land sought, and additional 'appropriate financial contributions', land would need to be made available at less than zero net value. The change is ill defined, unjustified, onerous and potentially counter-productive.

Change sought - not specified.

**Kingfisher Housing Association
(2312/21)**

Support the thrust of the amendments, but the wording should be amended to provide more flexibility, particularly in the context of 'serviced' land.

Change sought - amend wording to reflect above objection.

City Council's response to representation

The support for the change relating to financial contributions is welcomed, but the issue relating to the price of rents of, and costs of purchasing, affordable homes has already been responded to under Issue 6.79 of the 'Representations on the Deposit Plan'. No further change is therefore proposed.

The Local Authority considers that it is reasonable to require free serviced land, as it is already the normal practice in negotiations with developers, and is needed to assist in making the properties affordable. In certain circumstances, financial contributions may be sought, and therefore it is reasonable that the Plan should refer to this possibility.

The Local Authority has undertaken sufficient work to be satisfied that the different thresholds and proportions in the larger and smaller settlements will be viable but a more detailed viability appraisal of them will be undertaken.

Change Proposed – none.

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Bovis Homes Ltd (213/2)

If developers are to provide land free of charge, the cost of providing services should be the responsibility of the RSL. It is not clear what is meant by 'appropriate financial contributions', or when they will be sought. The proposed new wording is unnecessary, if the applicant is to negotiate with the Council.

Change sought - delete the new wording in RD06.19.

Clients of Southern Planning Practice Ltd (475/5), Linden Homes (503/1), Mapledean Developments (505/1), Graham Moyse (2299/1), Persimmon Homes (530/1)

Developers should not be expected to subsidise affordable housing further, for service infrastructure or by an additional contribution. The Proposal takes no account of the costs of development, contrary to Circular 6/98 advice. Requirements are excessive, unjustified and should be paid from the public purse.

Change sought - delete the words 'serviced' and 'and will also seek appropriate financial contributions, where necessary'.

Issue: 6.20 (Deposit 6.81)
RD06.20
Proposal H.6

Representations:

Support/resolved/withdrawn:

J Hayter (138/16)

Withdraw objections to criteria (iv) and (v) of Proposal.

Change sought-none.

Objections:

Twyford Parish Council (328/1), Clients of Southern Planning Practice Ltd (475/1)

The Proposal should also apply to the needs of the elderly and purpose built schemes for the elderly, where existing facilities cannot be extended and no sites are available within a village.

Change sought - not specified.

John Hayter (138/15)

Object to change to "defined and other settlements". Settlements other than those subject to Proposals H.2 and H.3 would not meet the requirements of criterion (iii) of Proposal H.6.

Change sought – not specified.

Clients of Southern Planning Practice Ltd (475/6), Linden Homes (503/2), Graham Moyse (2299/2),

City Council's response to representation

The support is welcomed.

The Proposal would allow for exception sites to accommodate some affordable accommodation for the elderly, but it would not be appropriate to include more general provision for the elderly on sites outside settlement boundaries. Most provision should be within settlements, close to existing facilities and public transport.

The issue relating to whether other settlements should be considered appropriate for exception sites, as well as adjacent to those defined in Proposals H.2 and H.3, has already been addressed under Issue 6.12.

The Proposal has been amended to allow schemes to be considered in undefined settlements in certain circumstances. Locations adjacent to settlements subject to Proposals H.2 and H.3 are likely to be the most suitable for exception sites, as these are the most sustainable settlements, but there may also be other smaller villages that would benefit from the provision of local affordable housing.

Schemes are normally promoted by Parish Councils, and therefore any schemes adjacent to Winchester, where no Parish Council exists, would require special procedures. Because of the much larger size of the settlement, there would be a need to ensure that all opportunities for provision within the urban area had been explored in the first instance. Any further consideration would require a full analysis of housing needs in the urban area and to what extent these are being met within the boundary, and an examination of all potential sites to identify preferred locations. Schemes would need to be promoted by the City Council, perhaps through the Town Forum.

A further change to the text to reflect these considerations is therefore proposed in the response to Issue 6.21 below.

The difference between settlements above and below 3000

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Persimmon Homes (530/2)

Generally support Proposal but it should be clear whether it applies to the larger settlements as well as those below 3,000 population. Schemes adjacent to larger settlements need not be small and would relate to the areas of greatest need. The Proposal should therefore be amended to allow schemes of an appropriate scale and location to the settlement, and to provide for key worker and shared equity housing. There is now confusion between the rural exception site policy and the provision of the wider affordable requirements of the District.

Change sought – amend to reflect above objection (wording changes suggested).

population is only relevant to the operation of Proposal H.5, as it defines the different thresholds that apply, and relates to current Government advice in Circular 6/98. It has no relevance to Proposal H.6, except that schemes are expected to relate to the size of the settlement concerned, the local housing need, and the relationship of the site to the settlement. This is set out in the change to paragraph 6.60, and no further change to Proposal H.6 is required to reflect this.

Change Proposed – none, but see recommended change in response to Issue 6.21.

Issue: 6.21 (Deposit 6.81)
RD06.21 and RD06.22
Paragraphs 6.59 and 6.60

Representations:

Support/resolved/withdrawn:

GOSE (261/24)

Support the changes in RD06.21.

Change sought–none.

John Hayter (138/16)

Withdraw objection to paragraph 6.60.

Change sought–none.

Objections:

Hawthorne Kamm Ltd (374/16)

Bewley Homes plc (386/15)

The deletion of the words 'will vary with the' and replacement with 'should be small-scale in relation to' could conflict with the level of housing need identified.

The wording should allow more flexibility.

Change sought – delete wording change to paragraph.

Kingfisher Housing Association (2312/22)

Support the deletion of the phrase that defines "small-scale". Need flexibility to increase supply of units. Should have regard to a range of issues, particularly the context, the size of the settlements to which the development relates, and the scale of need within the area. Greater regard needs to be given to issues such as the form and design of the proposed development.

Change sought - amend wording to reflect above objection

City Council's response to representation

The support is welcomed.

The support for the deletion of the phrase that defines small-scale is welcomed by Respondent 2312, although Respondents 2291 and 386 argue that the wording should be more flexible. The new wording provides increased flexibility, by deleting the maximum scheme size and allowing schemes to be considered adjacent to settlements of all sizes. It allows schemes also to be better related to local housing needs. The wording already requires consideration of the context, the size of the related settlement and the local housing needs. Each scheme needs to accord with Proposal DP.3, which sets out the design requirements, and this is further amplified in paragraph 6.61. No further change is proposed in response to this issue.

The recommended change below is set out in response to Issue 6.20.

Change Proposed – New Paragraphs following paragraph 6.62: Settlements where "exception" schemes would be considered would normally be those subject to Proposals H.2 or H.3, although in certain circumstances, schemes may be considered in other small villages.

In the case of Winchester, which has no Parish Council and is substantially larger than any other settlement in the District, special procedures will need to be established for the consideration of sites by the City Council. This will, however, follow a similar process to that used elsewhere in the District. This would involve an examination of the local housing need and to what extent it is being met within the urban area, and a full appraisal of potential sites to identify preferred locations.

Issue: 6.22 (Deposit 6.83)
RD06.23
New Paragraph

City Council's response to representation

The new paragraph introducing a maximum size limit for new dwellings of 1 or 2 bedrooms was introduced in response to

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Representations:

Objections:

John Hayter (138/13)

The new paragraph would allow not prevent enlargement of existing dwellings. This is not acceptable unless it ensures enlargement is not permitted on alterations to existing dwellings or future alterations to new development.

Change sought - delete new paragraph, and add new criterion to Proposal H.7 preventing alterations to existing 1 and 2 bedroom units that increases the number of habitable rooms.

Heron Land Developments Ltd (204/1), Bovis Homes Ltd (205/1) (213/4)

It is not necessary to define the maximum size of small units or to restrict extensions and conversions. This is unduly prescriptive, and it is unreasonable to remove permitted development rights to achieve this. Flexibility will be reduced if growing families are required to relocate when their needs could be met by altering or extending their existing homes.

Change sought - delete new paragraph.

Laing Homes Ltd (236/1)

There is no justification for a size threshold of 70m² for small units. It is unclear whether a lower threshold would be applied to some units, e.g. 1 bed units, and whether exceptional circumstances would be restricted to those set out. The restrictions would restrict the ability of households to adapt to changing requirements. The relationship between household need and demand, and the size of dwelling that would most effectively meet them (see also objection to RD12.28), is complex. The size limit is an arbitrary standard and would represent a highly undesirable constraint on the ability to design and implement an MDA.

Change sought - delete the new paragraph or amend to make it clear that it does not apply to the West of Waterlooville MDA.

Cala Homes (220/4), Cala Homes (South) Ltd (468/9)

The Proposal is over-prescriptive. There is no justification for limiting the floor area of a particular proportion of new dwellings or for seeking to remove permitted development rights to limit the floorspace.

Change sought - not specified

Bryan Jzeph Consultancy (373/10)

The maximum floorspace specification for one and two bedroomed properties will reduce rather than encourage flexibility of design. It will discourage those wishing to downsize to smaller units with generous

objections that more 1 and 2 bedroom dwellings does not necessarily equate to more small dwellings. It was also introduced in response to experience of operating the same Proposal in the adopted Local Plan, supported by supplementary planning guidance to amplify the principles of its operation. This experience has shown that a significant number of new developments are proposing 1 or 2 bedroom units significantly in excess of the normal gross floorspace for one or two bedroom dwellings.

One and two bedroom units are the sizes of dwelling in short supply generally throughout the District, and therefore it is reasonable to operate a policy which aims to correct the imbalance of dwelling sizes being provided by developers. If they are to meet the needs of small households, it is also reasonable to define a maximum size for these one and two bedroom units. It is not necessary to do so for larger dwelling units, as they are not in short supply, and will not meet the needs of small households, which Proposal H.7 particularly seeks to assist.

The 70m² maximum limit was not an arbitrary standard but was based on the figure used by the Housing Corporation to establish funding levels for different sized units. It is, however, now clear, through the scheme development standards used by housing associations, that this amount of space would not be sufficient to accommodate the requirements, also set by the Housing Corporation, that housing associations now have to meet. It is considered that the maximum floorspace figure used should be capable of being applied to both affordable and market housing, as they should both meet the same standards. It is therefore recommended that the maximum size limit should be increased slightly, to 75m², to accommodate the needs of the housing associations, and provide the necessary flexibility for all housing developers. A change to the wording is therefore recommended.

This figure should also provide units suitable for those wishing to downsize. Within higher density schemes, it may not always be possible for households to adapt to changing requirements, or to provide lifetime homes. New small dwellings will only form a relatively small proportion of the District's total housing stock, but they are the size of units in greatest demand. There is a wide choice of larger properties within the existing stock, and households may need to move to meet household needs for a larger property, to make the most efficient use of the housing stock in the District.

The maximum floorspace figure should also be sufficient for the smaller units within the MDA, particularly as it likely to be designed to a fairly high density. It should not therefore constrain the overall design, and it is not considered necessary to exclude the MDA(s) from meeting the requirements of Proposal H.7.

Where they are large enough, housing schemes should include a range of dwelling sizes, including both 1 and 2 bed units. The maximum figure would apply to 1 and 2 bed properties, although 1 bed properties should be substantially less than the maximum limit.

Exceptions to the maximum size limit would generally be restricted to certain conversion schemes, where they would not satisfactorily accommodate small units, and this is already set out in the new paragraph. The text does, however, include the word "normally", to allow for other circumstances to be considered, if developers provide a convincing justification for larger units.

Although other local authorities may operate a similar policy, each authority has to take account of the circumstances in their area in determining a method of operation. Proposal H.7 is designed to increase the supply of small units in the most effective way, to meet the needs of this District. It is not considered that there is a need to change its requirements to achieve consistency with other

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room sizes. Private developers should not be required to provide small units to make up the balance of small subsidised units. Planning legislation and the GPDO consider it appropriate that householders should have the flexibility to extend, and this leads to a wider housing choice. Attic conversions are practical, energy efficient and sustainable. The controls go beyond the Planning Act, are misleading and inappropriate.

Change sought - not specified.

Hawthorne Kamm (374/17), Bewley Homes (386/16), Bryant Homes (397/12)

The limit of 70m² is too low as it does not provide scope for those wishing to down-size. It does not accord with Government's objectives of flexibility as highlighted by 'lifetime homes'. The objective is short-sighted and would produce small dwellings that would not meet the needs of occupiers, and for which there would be no 'market demand'. It would result in inappropriate small dwellings with no opportunity to extend and fewer opportunities to move to fewer larger homes.

Change sought - not specified.

Linden Homes (475/7), Clients of Southern Planning Practice Ltd (475/8), Mapledean Developments Ltd (505/2), Graham Moyse (2299/3), Persimmon Homes (530/3)

Object to the inclusion of a size limit. It is not clear if it applies to one or two bedroom units or both. It is inconsistent to limit these but not others. The market should dictate the size of accommodation not the LPA. There should be a range of sizes for one and two bedroom units to provide greater choice to the purchaser.

Change sought – delete first two sentences of paragraph.

Winchester Housing Association (2088/1)

The size limit will cause Housing Associations difficulties in achieving the design standards required by the Housing Corporation. 70m² is insufficient to meet minimum standards for a two bedroomed dwelling.

Change sought – increase the size limit.

Kingfisher Housing Association (2312/23)

The introduction of a floorspace size limit for small dwellings is inappropriate and will act as a significant barrier to the production of both open market and affordable small units. Other Districts with a similar policy apply it to a proportion of, not all of, the small units. Some flexibility is essential, to allow a restrictive policy to function. The restriction will have a detrimental impact on the range of 1 and 2

authorities.

Consideration has been given to whether the enlargement of existing small dwellings should be controlled or prevented. It is concluded that it would not be appropriate to resist the enlargement of such dwellings completely. The text therefore indicates that all proposals to enlarge these small units would be brought within planning control, so that there is an opportunity to refuse those that would be inappropriate in terms of the aims of Proposal H.7. This is considered to be a reasonable approach, given the District-wide need to increase the supply of small units. It would not be possible to prevent the enlargement of existing dwellings, as the requirement would generally be imposed by planning condition, and this would not generally be the case for most other dwellings in the District.

It is not considered necessary to include the maximum floorspace figure in the Proposal. The Proposal includes requirements to achieve its main aim, that a reasonable proportion of properties "suitable for small households" are included within housing developments. It is considered that the maximum floorspace limit for the size of small households is rightly included in the explanatory text, as it is amplification of what is meant by "small 1 or 2 bedroom units suitable for small households".

Change Proposed – New Paragraph RD06.23

The gross floor area of these small units should normally not exceed 70-75m² floorspace.

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bedroom properties. Control of the enlargement of small dwellings is inappropriate and infringes on occupiers' rights to adapt properties to their needs. If the principle is to be pursued by the Council, it should be in the Proposal and not the text.

Change sought - amend wording to reflect the above objection.

Department of Health (2095/2)

Support objectives of Proposal, but it fails to address the needs of Lifetime Homes. There needs to be a choice of dwellings to assist people with special needs and at least 15% of new houses should meet lifetime homes standards. This need should also be referred to in the SPG.

Change sought – amend text to refer to the need to make such provision, and reflect in SPG.

Issue: 6.23(Deposit 6.85)
RD06.24
Proposal H.7

Representations:

Objections:

John Hayter (138/11)

The change is not acceptable. Proposal H.7 should conform to the entire Proposal DP.3.

Change sought - amend Proposal H.7 (iii) to refer to Proposal DP.3 and other relevant proposals'.

Kingfisher Housing Association (2312/24)

The wording should be clarified, particularly criterion (iii).

Change sought - amend wording to reflect above objection.

City Council's response to representation

It is accepted that criterion (iii) of Proposal H.7 should be amended, to accord with the entire Proposal DP.3.

All the criteria are amplified in the text, with criterion (iii) amplified in paragraphs 6.72 – 6.74. Proposal DP.3 sets out the general planning criteria for all developments, and this has been modified to include more specific density and design requirements. Criterion (iii) of Proposal H.7 therefore replaced the earlier more detailed requirements, as, with the revisions to Proposal DP.3, it was sufficient to refer to the specific requirements of that Proposal.

Change Proposed – Proposal H.7 criterion (iii):

(iii) it accords with ~~the density and design requirements of Proposal DP.3 (i) and (ii)~~ and other relevant proposals of the Plan'.

Issue: 6.24 (Deposit 6.44)
RDMAP38
Twyford

Representations:

Support/resolved/withdrawn:

Humphrey Farms Ltd (471/1)

The change to the H.2 boundary in Map 38a is supported as it now includes no's 5-7 Northfields.

Objection:

Twyford Parish Council (328/4)

The Inset Map and related map in the Urban Capacity Study appear to contain errors as the village boundary goes

City Council's response to representation

The support is welcomed.

These issues relate in part to the Local Plan and in part to the Urban Capacity Study. The Urban Capacity Study maps were revised as part of the first Housing Monitoring Report, which was published as a background document to the Revised Deposit Plan, but comment is not invited on them. The issues relating to the Twyford Inset Map in the Local Plan have already been considered in the 'Representations on the Deposit Plan' (under Issue 6.44) and therefore no further change is proposed.

Change Proposed - none.

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through the centre of the surgery, and the lawns of The Elms, a listed building in the conservation area is shown suitable for infill. The old fire station is in active use and any change would be contrary to policy.

Change Sought: *Amend Map to accommodate the changes requested.*
