WRITTEN STATEMENT

WINCHESTER CITY COUNCIL LOCAL PLAN PART TWO: DEVELOPMENT MANAGEMENT AND SITE ALLOCATIONS EXAMINATION HEARING SESSIONS JULY 2016

MATTER 2 – MEETING DEVELOPMENT NEEDS

Prepared on behalf of
the Russells
(EIP Reference 50269)

June 2016

WRITTEN STATEMENT TO
WINCHESTER CITY COUNCIL LOCAL PLAN PART TWO: DEVELOPMENT MANGEMENT AND SITE ALLOCATIONS EXAMINATION
HEARING SESSIONS JULY 2016

MATTER 2: MEETING DEVELOPMENT NEEDS

Prepared on behalf of
the Russells.

EIP Reference: 50269

Project Ref:	26138/A5/Hearing Statements
Status:	Final
Issue/Rev:	01
Date:	21 June 2016
Prepared by:	AW
Checked by:	HE
Authorised by:	HE

Barton Willmore LLP
The Observatory
Southfleet Road
Ebbsfleet
Kent
DA10 0DF

Tel: 01322 374660
Email: huw.edwards@bartonwillmore.co.uk

Ref: 26138/A5/AW/mg
Date: 21 June 2016

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

CONTENTS

1.0 INTRODUCTION

i) Matter 2

1.1 This Written Statement has been prepared on behalf of the Russell family (EIP Reference: 50269) in respect of Matter 2 of the Inspector's "Winchester District Local Plan Part 2 – Matters and Issues".

1.2 On behalf of the Russells, the Site has previously been promoted through the Local Plan Part Two and SHLAA process by Clarke Willmott LLP and Pegasus Planning Group.

1.3 This Statement has been prepared with due regard to the tests of 'soundness', as set out in Paragraph 182 of the National Planning Policy Framework (NPPF), namely:

- **Positively prepared** – plans should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – plans should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – plans should be deliverable over their period and be based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – plans should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.4 In accordance with the Inspector's Guidance Note for submitting representations to the Examination, this statement seeks to respect the 3,000 word limit, and does not repeat points already covered in original representations submitted to the Local Plan Part Two Draft Plan (Regulation 18) consultation (Pegasus Planning prepared on behalf of Lightwood Property, December 2014) and Local Plan Part 2 Pre-Submission consultation (Regulation 19) (Clarke Willmore LLP prepared on behalf of the Russells, December 2015).

ii) Overview of Down Farm, South West Winchester

1.5 The Russells are owners of land to the south west of Winchester, hereafter referred to as 'the Site'. The Site presents an opportunity to accommodate much needed new housing in the District, including more affordable and market housing, Starter Homes together with green infrastructure, local services and facilities. The creation of 'new settlements or extensions' and their ability to deliver new houses is widely acknowledged within National Policy, including the National Planning Policy Framework (NPPF):

> **"The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development**." [NPPF, Para 52]

1.6 In 2014, the Government invited local authorities to put forward ideas for developing garden cities of 15,000 homes or greater (Locally-Led Garden Cities, April 2014). This resulted in a number of initiatives receiving Government support including those at Ebbsfleet, Didcot and Bicester. A further prospectus was published in March 2016, entitled "Locally-Led Garden Villages, Towns and Cities", seeking expressions of interest in 'garden villages' of between 1,500 and 10,000 new homes.

1.7 The Russell's land provides a unique opportunity to make a significant contribution towards meeting local needs. Whilst too early for consideration under the recently published DCLG "Locally-Led Garden Villages, Towns and Cities" prospectus, in the future the Site could be brought forward based on "Garden City" principles or under an alternative delivery model.

1.8 The area can accommodate improvements to public transport and routes for sustainable transport modes including walking and cycling, and can help to enhance access to open space for local residents. The Site is large enough to respond to the many varied opportunities and constraints present within the District, whilst respecting heritage assets, landscape character and significant views of Winchester.

2.0 RESPONSE TO MATTER 2 – MEETING DEVELOPMENT NEEDS

Matter 2:

i. Does the Plan demonstrate that there will be a deliverable supply of developable new housing and employment land in appropriate locations over the plan period, with suitable infrastructure provision, in accordance with the NPPF/ PPG and LP Part 1

ii. Is there clear evidence suitably demonstrating how and why the allocated sites were selected, including in terms of appropriate consultation with the public, representative bodies, neighbouring authorities, service providers and other interested parties?

iii. Does the Plan deal appropriately and sustainably with the likely development needs of the smaller villages and rural area?

iv. Should the Plan address contingencies/ alternatives, including in relation to the site allocations, in the event that development does not come forward as expected?

2.1 This statement primarily focuses on Matters 2 (i) and 2 (iv).

2.2 Paragraph 47 of the National Planning Policy Framework (NPPF) states:

> "**To boost significantly the supply of housing, local planning authorities should:**
>
> - **Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;**
> - **Identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;**
> - **Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15….."**

2.3 The means of achieving this are set out in Paras 158 and 159 of the NPPF, which require authorities to have a clear understanding of housing needs in their area, based on adequate, up to date and relevant information and, to that end, to prepare a strategic housing market assessment.

2.4 Winchester City Council's (WCC) justification for the strategy and policies in the Local Plan Part 2 (LPP2) relies on the assessment of development requirements, spatial strategy and policies of the Joint Core Strategy (Local Plan Part 1) which was adopted by WCC and the South Downs National Park Authority in March 2013.

2.5 Local Plan Part 1 (LPP1) is based on an assessment of development requirements from the South East Plan which was adopted in 2009 and subsequently revoked. The South East Plan's housing targets pre-dated the NPPF and Planning Practice Guidance (PPG), and were therefore not based on an objective assessment of housing need as is now required. On this basis, LPP1 and LPP2 cannot be considered consistent with National guidance, including the NPPF.

2.6 The first thing to note is how the submitted LPP1 housing figure (550 dwellings per annum) was a reduction of the South East Plan figure (612 dwellings per annum). This was underpinned by the Housing Technical Paper dated July 2011. In the LPP1 Inspector's Report, dated 13 July 2013, the Inspector increased the housing target from 11,000 to 12,500 (2011-2031) on the basis of him determining that this would '*reflect objectively assessed needs for affordable housing'* (Para 53). This figure did not take into consideration the PPG requirement to consider market signals (Para 020 Reference ID: 2a-020-20140306) and economic-led need (Para 018 Reference 2a-018-20140306), as is now required.

2.7 The Housing Technical Paper (2011), stated how the delivery of 11,000 dwellings, 2011-2031 (550 dwellings per annum), would support an increase in the economically active population of 6,550 people (330 dwellings per annum). Interestingly, the Housing Technical paper identified a Nathaniel Lichfield and Partners (NLP) produced economic-led housing projection (prepared on behalf of Cala Homes) of 15,640 dwellings, 2011-2031 (782 dwellings per annum). The Technical Paper suggested the NLP scenario should be given limited weight and did not recommend it for the draft LPP1.

2.8 Barton Willmore has taken a look at past trends in job growth from Experian, which show how Winchester experienced job growth of 11,300 between 1997 and 2011 (800 jobs per annum). NLP's figure of 782 dwellings per annum was underpinned by only 540 jobs per annum. Latest Experian forecasts show a much higher job forecast of 990 jobs per annum. Having considered economic-led housing projection patterns, it is reasonable to conclude that a full appreciation of economic-led need would show a higher objectively assessed need (OAN) than demographic-led need, as demonstrated below:

	Jobs per annum	**Dwellings per annum**
NLP (prepared in 2011)	538*	782
Barton Willmore Winchester LPP1 EiP statement (2012)	420**	720-740
Barton Willmore Winchester Modelling (March 2014)	833***	890-970
Barton Willmore 2016	800+	950+****
Other scenarios		
NLP Affordable Housing Led (2011)	n/a	938 – 1,250

*2007 Job Forecasts

**2012 Job Forecasts

***2013 Job Forecasts

****Subject to modelling

2.9 It is not a legal requirement for a site allocations and development management plan, within the premise of an over-arching Core Strategy, to re-consider development requirements, on the basis of the High Court judgement in the case of Gladman v Wokingham Borough Council (Case No: CO/1455/2014, 11th July 2014). However, it is clear that notwithstanding the above, the Government's intentions remain. Every effort should be made to objectively identify and then meet the housing need (Para 17). In the case of Wokingham Borough Council, it was confirmed to be a lawful approach for the Inspector to consider the allocation of housing sites in the Managing Development to Delivery Local Plan. Woking Borough Council's justification for the strategy and policies in the Managing Development document relied on the assessment of development requirements, spatial strategy and policies of the Core Strategy, which were not based on OAN. However, we note that an early review of the Wokingham Core Strategy is now underway. The early review focuses on refining the housing target, having regard to the results

of an objective assessment of housing need and identifying and allocating sufficient land for housing as well as other uses.

2.10 The Council's Local Plan evidence base is not up to date and cannot be considered robust. It is not compliant with National guidance. The most recent Strategic Housing Market Assessment (SHMA) is the PUSH SHMA (January 2014); however, this only considered part of the District. Paragraph 1.8 of the draft LPP2 acknowledges the publication of the PUSH SHMA, however, states that a decision will be made in the future about how or if the Plan needs reviewing.

2.11 Currently, the Council's approach to housing delivery is not achieving its stated aim. Para 3.3.6 of LPP2 states that "the housing requirement for Winchester can be met from within the existing built up area (and Barton Farm) with only limited reliance on windfall sites, without the need to identify additional greenfield allocations". The current housing target for Winchester is 4,000 dwellings from 2011-2031 (200 dwellings per annum). The table in Section 3.3 of the LPP2 states that 349 dwellings were completed between 1 April 2011 and 31 March 2015, despite there being 3,156 dwellings with planning permission. The current approach does not allow for sufficient flexibility to respond to housing need and is therefore contrary to Para 14 of the NPPF. In adopting a more flexible approach, the Plan would be able to address undersupply, if anticipated development did not come forward when expected.

2.12 WCC has a statutory duty to review matters which may be expected to affect the development of its area (Section 13(1) of the Planning and Compulsory Act 2004), and has a duty to keep the development plan documents under review, having regard to the results of any such review (Section 17(6) of the Planning and Compulsory Act 2004).

2.13 On the assumption that LPP2 is progressed in its current form, we respectively request an immediate review of LPP1. This would allow for an assessment of OAN in the form of a robust SHMA for Winchester District, as required under Para 158 of the NPPF. This in turn should be supported by a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. Any spatial strategy should allow for sufficient flexibility to respond to SHMA figures or to adapt to rapid change, as required by Para 14 of the NPPF.

2.14 The Russells' land provides a unique opportunity to make a significant contribution towards meeting local needs. The Site can accommodate much needed new housing, including more affordable and market housing, Starter Homes together with green infrastructure, local services and facilities.