

Winchester District Local Plan Part 2 – Development Management and Site Allocations

Examination – July 2016

Winchester City Council

Response to Inspector's Questions:

**Matter 2 Meeting Development Needs
Question i) - iv)**

Library Reference: WCC FS 02



Matter 2: Meeting Development Needs

Inspector's Questions:

- 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?

Introduction and background:

1. The adoption of [Local Plan Part 1](#) in March 2013 (OD7), established the development strategy in both quantum and spatial distribution of growth for the Winchester District up until 2031. LPP1 was subject to a High Court challenge on three grounds, which was subsequently dismissed (EBT3).
2. The purpose of [Local Plan Part 2](#) (LPP2) ((SUB1) is to add the necessary detail through the allocation of sites for development in accordance with the strategy in LPP1 and to set out a series of development management policies to replace those saved from the Winchester District Local Plan Review 2006 (OD10).
3. Preparation of Local Plan Part 2 commenced with extensive community engagement, through active participation with parish councils to identify potential sites for development. In addition, numerous [technical assessments](#) were undertaken, together with sustainability appraisal assessments to determine the most appropriate and deliverable sites to allocate in LPP2. This process was continual from late 2012 until late 2014, when the Draft Local Plan was compiled and published for consultation under [Regulation 18](#) (OD4).

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4. Some 360 representations were received at the [publication](#) stage, commenting on the 'soundness' and legal compliance of LPP2, which was formally [submitted](#) for examination on 23 March 2016.

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?

Housing

5. Most representations on the Pre-Submission Local Plan which raise questions about land supply relate to housing. The Council has produced [Background Paper 1 – Housing Requirements and Supply](#) (OD15) to cover this issue in detail. This concludes that LPP2 is consistent with LPP1, which took account of all housing needs including affordable housing, and that there is no need to review the 'objectively assessed need' established in LPP1 at this time. While housing delivery is slightly behind the LPP1 housing trajectory, it is anticipated that the housing requirement will in fact be exceeded over the Plan period.
6. Section 5 of Background Paper 1 (OD15) deals with the requirements of NPPF paragraph 47, with the most relevant to Matter 2(i) being bullet points 2 (5 year land supply/buffer), 3 (deliverable sites) and 4 (trajectory and implementation strategy). Background Paper 1 concludes that many of the requirements of NPPF paragraph 47 are met in full by Local Plan Part 1 (bullet points 1, 4 and 5) and it is neither necessary nor appropriate to re-visit these matters in LPP2. LPP2 provides the necessary detail for the Inspector to be satisfied that an adequate supply of deliverable sites will be maintained and implemented, satisfying bullet points 2 and 3.
7. Section 5 of the Background Paper remains up to date and addresses the key issues in relation to NPPF paragraph 47. The only matter which the Council would add is in relation to the 'Liverpool' methodology for calculating 5-year land supply, by reference to a further relevant High Court case (*Bloor Homes (East Midlands) Limited v Secretary of State for Communities and Local Government and Hinckley and Bosworth Borough Council High Court judgment (CO/2334/2013 March 2014)*). This has been placed in the examination library (EBT25) and confirms that both the Liverpool and Sedgfield methodologies are recognised ways of

calculating housing supply and that the choice of methodologies should reflect local circumstances:

‘... the inspector based his choice of the Liverpool method on his consideration of the relevant facts, including the pattern and pace of housing provision planned for the borough in the core strategy. That was the context here. The inspector plainly took the view that, in the circumstances of this case at the time of his decision, the Liverpool method was the better way to establish what the level of supply really was. (Appendix 1 paragraph 110).

8. The ‘circumstances’ in Winchester are that the LPP1 is up-to-date and NPPF-compliant, has a strategy whereby strategic sites form a large part of the housing provision, and expects the timing of development to reflect this. This produces a ‘humped’ trajectory rather than the ‘flat’ trajectory used in the Sedgefield methodology. The judgement adds support to the use of the Liverpool methodology in the context of Winchester.
9. With regard to housing supply and delivery, a detailed assessment of the various sources of housing supply is set out in Section 6 of Background Paper 1. This concludes that the Inspector can be confident that all of the LPP1 housing targets for spatial areas will be met and that significantly more than 12,500 dwellings will be delivered at the District level over the Plan period. There are a few updates or additional matters, which are dealt with under the following ‘supply source’ headings:

Completions 2011-2015

10. Completions data from the start of the Plan period to 31 March 2015 is included in the 2105 Annual Monitoring Report (OD14). One respondent (Drew Smith) seeks to argue that there is a shortfall of ‘planned’ completions, but any distinction between ‘planned’ and total completions is arbitrary, artificial and irrelevant and is not one made by the County Council or DCLG. Also, the respondent’s definition of ‘planned’ completions (respondent’s ‘Turley Report’) includes all categories of completions anyway and the figures on which this argument is based do not match the completions data supplied by the Council (or used in the respondent’s Further Statement, see Appendix 1). Therefore, the distinction between

‘planned’ and other completions is not justified and the ‘evidence’ for any shortfall is inaccurate and inconsistent.

Outstanding Permissions at 31.3.2015

11. The situation remains largely as set out in the Background Paper (paragraphs 6.4 – 6.44), which includes a detailed assessment of all sites of 100 or more dwellings. The most significant challenges by respondents relate to the delivery of these large sites, particularly the strategic allocations, and these are addressed in Appendix 1 below, in Background Paper 1 (OD15), or within the Council’s settlement-specific Further Statements. The Council has not yet been able to update the situation to a March 2016 base date, so has not included new consents which continue to come forward. However, where these relate to LPP2 allocations or other sites specifically mentioned by respondents the Council’s Further Statements update the situation.

SHLAA Sites Within Settlement Boundary

12. Representations regarding the delivery of specific SHLAA sites which contribute to settlement housing requirements are addressed in the relevant Council Further Statements and at Appendix 1 below.

Windfall Allowance

13. No change from AMR and Background Paper, see Appendix 1.

‘Remainder to be Allocated’ (LPP2 Site Allocations)

14. Appendix 3 of Background Paper 1 provided an update on the delivery of LPP2 site allocations (at March 2016) and concludes that several LPP2 sites will be delivered more quickly than the AMR estimated. This remains the case and an update is given at Appendix 1, with details of the status of all LPP2 allocations included in the Council’s relevant settlement Further Statements. The Inspector’s questions include reference to the deliverability of sites, so this will be a matter to be explored at the examination hearings.

Conclusion – Matter 2(i) Deliverable Supply

15. The situation remains largely as reported in Background Paper 1 (OD15), although here have been several changes which increase or bring forward the amount of housing being delivered.

Employment

16. In relation to employment land (also part of Matter 2(i)), LPP1 policy CP8 sets the objectively assessed need at 20 hectares of new employment land over the Plan period. LPP1 made a 'strategic allocation' for employment of 20ha. at Bushfield Camp to meet this need. It recognised that elsewhere there were substantial existing commitments, for example in South Hampshire at Whiteley (Solent Business Parks) and Waterlooville (SH2). Consent has been granted for the 23ha. of employment land allocated at West of Waterlooville, split between the 'Old Park Farm' (Taylor Wimpey) and 'Berewood' (Grainger) parts of the site. Small areas have been consented for housing or care provision (see Background Paper 1) but approximately 21 hectares (83,000 sq m) remains available and consented for employment use. No planning applications have been received for Bushfield Camp, as this is allocated for development which could not otherwise be accommodated within Winchester (LPP1 policy WT3).
17. Additionally, substantial land at Station Approach in central Winchester is allocated for employment (office)-led development (about 16,000 sq.m.) by policies WIN5–WIN7 and land at Little Park Farm, Whiteley is allocated for employment use (approx. 1.3 ha / 5,200 sq m) by policy SHUA4. Policies SHUA2 and SHUA3 continue to allocate those parts of the Solent Business Parks which have not yet been developed for employment use (approx. 10 ha / 40,000 sq m).
18. Therefore it has not been necessary to allocate employment land to meet a 'strategic' need, but allocations are proposed in the larger market towns (policies BW5 and NA3), in addition to the above, to meet the LPP1 development strategies for these areas (WT1 and MTRA1/MTRA2).

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?

19. The [Housing Site Assessment Methodology](#) (EBT4) sets out the approach to allocating sites, covering the broad methodology used to identify and assess them as well as summarising the settlement-specific approaches. A considerable amount of background evidence was collected by both the Parish Councils for the market towns and larger villages and the City Council for all the settlements where the LPP1 development requirements

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remain to be met. The evidence evolved and was updated as plan preparation progressed, being shared between WCC and the local councils and published on the Councils' websites at various stages.

20. Topic based assessments on matters such as transport, landscape sensitivity, open space provision and the historic environment are available for each of the settlements, together with initial sustainability appraisals (SA5a-g) of the effects of the alternative sites. Documents such as planning briefs and frameworks were also drawn upon in Winchester, with such as settlement profiles and constraints mapping being collated for the other settlements - see extensive evidence base list in Examination Library.
21. The approaches to community engagement in the early months leading up to the publication of the Consultation Draft Plan varies between the settlements, as the Parish Councils decided what was appropriate for their own communities, with more or less involvement by the City Council as needed. Details of the community involvement are set out in the [Council's Regulation 18 Consultation Statement \(OD5\)](#) up to the Draft Plan stage and the [Regulation 18 Consultation Statement Part 2 \(OD2\)](#) describes the consultation on the Draft Plan and up to the Publication (Pre-Submission) Plan. The consultation in all settlements and at all stages meets the legislative requirements and those of the Statement of Community Involvement.
22. Some representations suggest that the number of people responding to the early consultation on the shortlisted sites was not enough to give a clear mandate for site selection or avoiding the requirement to objectively assess the competing sites. The Council cannot require or force people to respond and its conclusions about public views must be based on the responses it receives. The Council has undertaken an objective assessment of the sites and has not used the consultation process to avoid this, or as a substitute for it. The consideration of the sites as alternatives was based on the evidence base.
23. The public consultation was undertaken so that account could be taken of the public's views, alongside (not instead of) the evidence base. This is illustrated by the Reports to Cabinet Local Plan Committee on [16 September 2015 \(WCC3\)](#) and [6 October 2015 \(WCC4\)](#). Appendices to the reports include comparative assessments of the alternative sites against the selection criteria, with the results of community consultation (one of the criteria) considered along with other selection criteria. Consultation with

other bodies and interested parties is also referred to in the Duty to Co-operate Statements (OD6, OD3, SUB8).

24. The description in the Plan of the site selection methodology is broadly generic given that some variation in the process exists between the settlements, reflecting the different character of the settlements, the degree of involvement of the Parish Councils and absence of parishes within most of Winchester City. The approach in the City also reflects the existing strategic allocation (Barton Farm) and potential for redevelopment within the City relative to the outstanding development requirement.

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

25. The amount of housing to be provided in the Plan period is established in LPP1, with a requirement of 2,500 dwellings for the 'Market Towns and Rural Area' (policy CP1). All of this is allocated to the 8 larger settlements specified in policy MTRA2 and no housing requirement is specified for any of the smaller settlements listed in policy MTRA3, or for the countryside (MTRA4). The LPP1 Inspector's Report (EBT2) refers to settlement boundaries and settlement gaps, stating that these are site specific issues for LPP2 and that this *'includes the review of all MTRA2 settlement and gap boundaries...'* (paragraph 110). This relates only to policy MTRA2 settlements and, in relation to Policy MTRA3, the Inspector stated: *'in the absence of any strategic need for new housing in the smaller settlements, or the wider countryside to which policy MTRA4 applies, there is no assumption that existing boundaries there would need to be reviewed'* (paragraph 116).

26. The approach to development in the smaller settlements is set out in LPP1 policy MTRA3 and is based on meeting local needs. MTRA3 supports development in those smaller settlements which have defined settlement boundaries, and infilling within other named settlements without settlement boundaries. Additionally, development proposals may be supported to reinforce a settlement's role and function, to meet a community need or to realise local community aspirations for which there is clear community support. MTRA3 therefore allows development that is appropriate in scale and design to the settlement, but the initiative for development beyond that normally allowed should come from the local community. Hence the question of the development needs of the smaller villages and rural area is already addressed by LPP1 and there is no need for LPP2 to make allocations in this area (see LPP2 paragraph 4.10.1).

27. The [Report to Cabinet Local Plan Committee CAB 2711\(LP\) 16 September 2015](#) (WCC3) provides a more detailed response to those representations on the Draft Local Plan which raise issues regarding the smaller villages and rural area.

28. Miller/Gleeson/Bloor (52010) submitted a representation suggesting the allocation of a strategic-scale site in countryside to the north of the 'Boorley Fields' development and the Eastleigh Borough boundary. Strategic sites are allocated in LPP1 and non-strategic sites in LPP2. Background Paper 1 (OD15) explains why LPP2 does not need to review the objectively assessed housing need, including in the light of the PUSH Position Statement. Neither Eastleigh Borough, which is progressing its Local Plan, nor any other neighbouring Council has asked WCC to help meet its development needs. Therefore no change is required in this respect.

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

29. The Council is satisfied that it has made provision to meet the development requirements set by LPP1 in full and has provided sufficient evidence to demonstrate that sites will be delivered over the Plan period. If the Inspector has serious doubts about the reasonable likelihood of a site allocation being delivered, this should be identified as a 'soundness' issue and addressed by the Inspector's recommendations (by amending the Plan's policy or allocating another site). Any more general concerns can be dealt with through a future review of the Plan and, on this basis, there is no need for contingencies/alternatives.

30. Response to Further Submissions

31. Various Further Submissions allege that the Council is unable to demonstrate a 5-year supply of housing, or will be unable to in future. Most of these submissions are in general terms or raise issues which are already covered in the AMR (OD14), Background Paper 1 (OD15), or above.

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32. However some respondents (Drew Smith in particular) have submitted comments on housing land availability and Appendix 1 below responds to each site that is challenged by the respondents.

33. Conclusion

34. The situation regarding housing land supply remains largely as reported in Background Paper 1 (OD15), although here have been several changes which increase or bring forward the amount of housing being delivered. Appendix 1B to OD15 remains realistic and shows at least 8 years of housing land supply from 2015/16 onwards. Employment land requirements are also met by existing allocations and commitments, which remain available.

35. Consultation and assessment of the extensive evidence base has aimed to be thorough but proportionate in the site selection process. That some representations are critical of the assessment methodology, or the approach to consultation, tends to reflect their disagreement with the outcome and preference for alternative site(s) to be allocated, rather than demonstrating a lack of soundness due to the inadequacy of the consultation or evidence.

36. The development needs of the smaller villages and rural area are already addressed by LPP1 (policies MTRA3 and MTRA4) and there is no need for LPP2 to make allocations in this area. MTRA3 gives scope for local communities to support development for which a community need has been identified.

37. LPP2 will meet the development requirements set by LPP1 in full, through site allocations which are deliverable over the Plan period, so there is no need for contingencies/alternatives.

Proposed Modifications to the Plan:

38. None.

Appendix 1 – Housing Land Supply Update

This Appendix responds to matters raised by respondents (mainly Linden Homes and Drew Smith) in relation to housing land supply. It considers each of the sources of supply relied on by the Local Plan.

Completions

Exception Sites

The Council agrees with Drew Smith that 98 completions (85 of the total) between 2011–2015 were on affordable housing ‘exception’ sites. It does not agree that these should be excluded from completions figures as exception sites are clearly completions and there is no basis whatsoever for discriminating against such dwellings. This is not a distinction that is made by the County Council or DCLG when gathering or reporting completions data. The attempt to exclude these completions is based on a misunderstanding of LPP1 policy CP4 and the way it is implemented.

Policy CP4 provides for affordable housing ‘on land where housing development would not normally be permitted, and in addition to general housing provision in Policy CP1.’ Policy CP1 sets the total housing target of 12,500 dwellings and divides this into the 3 spatial areas of the District. Exception sites will only be developed in the rural part of the District, which is defined as the ‘Market Towns and Rural Areas’ (MTRA), and no exception sites have been completed or permitted in the other 2 spatial areas. The 2,500 dwellings required in the MTRA area are made up as follows:

<u>Settlement</u>	<u>MTRA2 Requirement</u>
Bishops Waltham	500
New Alresford	500
Colden Common	250
Denmead	250
Kings Worthy	250
Swanmore	250
Waltham Chase	250
<u>Wickham</u>	<u>250</u>
TOTAL	2,500

In assessing the capacity of all of these villages and the amount of additional land that needs to be allocated, exception sites have not been taken into account, to ensure that they are ‘in addition to’ the 2,500 dwellings allocated to the MTRA area and the 500/250 dwellings allocated to each village. For example, in Kings Worthy, neither the recently-completed exception site of 25 dwellings, nor a further consent for 25 dwellings, have been taken into account when assessing how much land would need to be allocated to meet the 250 dwelling target for Kings Worthy. This ensures that exception sites are ‘in addition to’ the 250 dwellings required under policy MTRA2 and the total CP1 requirement of 2,500 for the MTRA area and 12,500 for the District.

The Council has, therefore, ensured that any exceptions sites are ‘in addition’ to the housing required under policy CP1. Failing to count dwellings

completed on exception sites, as this respondent appears to promote, would be artificial, unjustified and unnecessary.

'Planned' Completions

Drew Smith also seek to argue that there is a shortfall of 'planned' completions (see also paragraph 10 above). The latest submission refers to 'windfall' and 'identified' sites, which is not a distinction made in LPP1, its housing trajectory, or Government advice. It contains figures which differ from those in the respondent's original submission ('Turley Report'), which defined all of the categories in the LPP1 trajectory as 'planned' completions (strategic allocations, SHLAA sites and commitments). Therefore, all of the completions recorded in the LPP1 trajectory (and the AMR update) are 'planned/identified' and the Council has not underestimated 'identified' sites, as it does not use this categorisation. Clearly completed sites must have been 'commitments' (part of the respondent's 'planned' grouping) otherwise they would have been built without planning permission, and they are obviously 'identified' as their completion has been recorded.

The Council agrees that a significant proportion of completions have been from sites that originated as 'windfalls', and argues that these will continue to provide a significant element of land supply (see Background Paper 1 paragraphs 6.55 – 6.63). The references to windfalls (or other categories of supply) in the LPP1 and AMR trajectories relate to future projections, it does not mean that, once completed, windfalls (or other categories) cannot be counted as completions. Clearly the Local Plan does not rely only on 'identified' (allocated) sites and there is no reason why only these sites should count as completions.

Commitments

Strategic Allocations (West of Waterlooville, North Whiteley, Barton Farm)

See Background Paper, 1 paragraphs 6.4 – 6.26. The Council maintains its view that its estimates of delivery remain realistic and would provide the following updates:

West of Waterlooville

An additional consent has been granted (post April 2015) for 'Old Park Farm' West of Waterlooville for 103 dwellings on land previously identified for employment uses. This is referred to in paragraph 6.7 of the Background Paper, but is in addition to the trajectory figures at BP1 Table 5 and in the AMR. It forms the final phase of development on the Taylor Wimpey part of Waterlooville and is due to commence this year.

Paragraph 6.13 of Background Paper 1 (OD15) states that the number of housebuilders at Waterlooville is about to increase from 3 to 5 and the Council understands that Grainger has now announced the sale of Phase 3 of West of Waterlooville to Barratts and David Wilson Homes to achieve this.

North Whiteley

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The S106 obligation has been agreed by all the signatories and is in the process of being signed, and reserved matters applications have started to be submitted.

Barton Farm

The land price dispute that is mentioned by various respondents (see BP1 paragraph 6.25) has now been settled and housing building is starting.

Other Large Site Commitments

The following large site commitments have also been challenged by one or more respondents:

Silver Hill, Winchester

The Council agrees that Silver Hill is unlikely to contribute to 5-year land supply, although it is still expected to contribute approximately 300 dwellings during the Local Plan period (see Background Paper 1 paragraphs 6.27 – 6.36 and Background Paper 3 – OD17).

The Apex Centre, Colden Common

This site has consent for 12 dwellings and is currently under construction. The AMR estimates the development will be completed in 2016/17, which continues to be realistic.

Worthy Down Camp, Winchester

Outline consent was granted to the Defence Infrastructure Organisation for the remodelling of Worthy Down Camp in 2014 (12/02351/OUT). This involves the demolition of 45,000m² of floorspace and the construction of 77,000m² of floorspace for training / welfare / offices / single living accommodation / messing / support / stores facilities and the construction of up to 90 dwellings off Connaught Road to accommodate service families. This development is now under construction.

The planning application form shows a gain of 90 units of 'key worker' housing. The consent is subject to a S106 agreement that provides for any units that become surplus to service requirements to provide affordable housing in accordance with the prevailing development plan policy.

Drew Smith argues that the service family accommodation was not assessed as part of the SHMA and should therefore not be included in meeting the housing requirement. The Council understands that service families were included in its projections of housing need (based on the Chelmer model run by Hampshire County Council) and that fertility and mortality rates were applied, but these households were not 'aged on' as they tend to consist of constant age groups. This accommodation should, therefore, be taken into account and the proposal will result in a substantial gain of 90 dwellings.

Chesil Car Park, Winchester

This is a scheme of 52 extra care units which has consent and is currently under construction as part of the Council's New Homes Programme. Drew Smith suggests that these units cannot be counted towards the housing

supply as they are not C3 uses. However, the LPP1 requirement is for 12,500 'dwellings' and does not seek to restrict this to Use Class C3. Hampshire County Council assesses housing sites consistently across the County and, where extra care or other forms of older person's accommodation provides independent living accommodation (i.e. 'dwellings'), it is counted towards the housing supply. Older person's needs were also assessed as part of the SHLAA, as confirmed at paragraph 4.19 of Background Paper 1 (OD15), so it is legitimate to count housing that contributes towards these needs.

Abbey Mill, Bishops Waltham

This site was included in the 2015 AMR (Appendix 4) as a commitment for 70 dwellings but was classed as 'unlikely' at the base date of April 2015. This was because the site had been acquired by Sainsbury's and had consent for a supermarket. However, Sainsbury's has now reviewed its programme of supermarket development and confirmed that it will not be implementing this consent. The site has been put on the market and this is at an advanced stage, with the site being 'under offer'. The Council understands that it is likely to be sold to a housing developer.

Consent for 70 dwellings was granted on 7 January 2008 and an application to extend the time limit of the consent was made in 2010, although this has not been determined. The principle of a development including significant housing is, however, established and it is expected that the site will be acquired in the near future and that housing will be proposed.

The future of this site is likely to be subject to discussion under Matter 6, with some suggesting that it should be subject to an allocation in LPP2. While the Council does not support this approach, and the exact number of dwellings is not yet known, it considers that it is appropriate to maintain an estimate of 70 dwellings. As this site was previously classed as 'unlikely' to be delivered (and not counted within the land supply), its inclusion results in an increase of 70 units in both the 5 year land supply and over the Plan period as a whole.

SHLAA Sites Within Settlement Boundaries

Site 889 – Avondale Park, Colden Common

This site has been promoted as a SHLAA site by the landowner. In order to provide greater certainty of development, the site owner subsequently promoted this site and an adjoining area as a Local Plan Part 2 allocation and this has been agreed (policy CP2). The site is an undeveloped part of a larger area allocated by policy CP2 for approximately 53 dwellings in the Submitted LPP2 and site 889 is included in the SHLAA with an estimated capacity of 16 dwellings to be delivered in the SHLAA period 2015 to 2020.

The land is suitable for development as it is within the settlement boundary of Colden Common and part of a proposed LPP2 site allocation. The landowner has shown clear interest in developing the land, which is currently unused, and it is, therefore immediately available for development. There are no known constraints to the development of the land and it is, therefore, achievable. Accordingly, the Council is satisfied that the site will be

developed in the short term and that its likely contribution should be recognised.

Site 1966 – The Cricketers Arms, New Alresford

The SHLAA includes an estimate of 14 dwellings to be delivered on this site in 2015-2020. The owner of this site originally promoted a larger area for 16 dwellings but consent has recently been granted for 9 dwellings (subject to a legal agreement). It is, therefore, agreed that 9 dwellings are likely to be completed in the 5 year period.

Site 276 – Land to the Rear of 58 The Dean, New Alresford

The SHLAA includes an estimate of 9 dwellings to be delivered on this site in 2015-2020. The site is subject to a current planning application for 4 dwellings, which it is expected will be determined in the near future. In view of the current application the Council agrees that 4 dwellings are likely to be completed in the 5 year period. The respondent argues that the site is now too small to be included in the SHLAA, but the site itself remains the same size and is capable of providing more units. Therefore the Council argues that it should be included with a capacity of 4 dwellings.

Site 2062 – Land at Church Farm, Sparsholt

The SHLAA includes an estimate of 8 dwellings to be delivered on this site in 2015-2020. Permission was granted in June 2012 for redevelopment for 7 dwellings and there was a further application to convert the redundant farm building. An application for improvements to the access to Church Farm Lane was approved in March 2016 and the landowner is in discussion with a house builder who is exploring the scope to increase the number of dwellings. There remains landowner interest in bringing this site forward for at least the number permitted, and improvements to the access have recently been permitted. Therefore the Council considers that it is justified in including this site within the 5 year supply.

Site 2450 – Carfax, Winchester

This site is part of the wider 'Station Approach' area and the SHLAA includes an estimate of 40 dwellings to be delivered on this site in 2015-2020. Winchester City Council has recently acquired the former Registry Office from Hampshire County Council and the site has been identified as suitable for commercial, housing and parking development in the Station Approach Development Assessment. The site is a proposed allocation in LPP2 for mixed use development (LPP2 policy WIN6), including residential.

The Council has initiated a 'competitive dialogue' process, whereby formal development proposals have been invited and are being assessed. Two schemes were shortlisted and subject to public consultation in May 2016. The Council will decide how to progress the project to bring it forward for mixed use development. It expects the site to contribute at least 40 dwellings within the 5 year period and therefore considers the SHLAA estimate to be realistic.

Site 2558 – Dyson Drive, Winchester

The SHLAA includes an estimate of 9 dwellings to be delivered on this site in 2015-2020. The site is being promoted as part of the Council's New Homes

Delivery programme and is expected to be delivered between 2015 and 2020. The site has not yet been specifically identified to be brought forward in the housing program, but it is the Council's intention that this site will be developed after land at Hillier Way (Local Plan policy WIN9) is developed. The Council owns this site and plans to bring it forward for housing development, so considers that it will contribute 9 dwellings within the 5 year period.

SHLAA sites conclusion

The 2015 AMR considers the likely phasing of SHLAA sites and does not anticipate any being completed prior to 2017/18 (see 2015 AMR, table 21). This is to take account of the need for sites to gain planning consent and be developed (former SHLAA sites that now have consent are treated as 'commitments'). The contribution of SHLAA sites is now very modest, but it is entirely justified to include such a contribution. The Planning Practice Guidance is clear that sites do not need to benefit from planning consent to be included within the 5 year supply

'...planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe.'

(PPG paragraph: 031 Reference ID: 3-031-20140306)

The Council has provided the robust evidence sought and shown that there are no significant constraints to the delivery of the sites which the SHLAA expects to be delivered within the next 5 years. As these sites have been brought forward their capacity has been adjusted and has been reduced by 10 dwellings. However, other (undisputed) SHLAA sites may have had capacity increases, for example site 2589 (Wilberforce Drive, Winchester) which is likely to provide more than the SHLAA estimate (see Further Statement on Matter 14 General).

The above assessment just relates to sites expected to contribute to the current 5 year land supply. The Local Plan examination needs also to consider housing supply over the Local Plan period as a whole and, even if these sites were delayed, they would still contribute housing within the Plan period.

Windfall

Drew Smith (SPRU) now appear not to accept that there should be any windfall allowance, although the previous 'Turley Report' did accept the Council's allowance and the SPRU submission is mainly about how windfall is treated in relation to past completions, not future supply. The Council maintains its view that the windfall allowance is justified and, if anything modest, as set out in Background Paper 1, paragraphs 6.55 – 6.63.

LPP2 Allocations

Appendix 3 of Background Paper 1 provided an update on the delivery of LPP2 site allocations (at March 2016). The Background Paper concludes that several LPP2 sites would be delivered more quickly than the AMR estimated. This remains the case and the following updates Appendix 3 of the Background Paper:

- BW1 Coppice Hill – Pre-app submitted for 34 dwellings on part of site.
- BW3 The Vineyard – Pre-app submitted for 120 dwellings.
- BW4 Albany Farm – Resolved to grant outline consent for 120 dwellings, 26 May 2015.
- CC1 Main Road – Resolved to grant outline consent for 165 dwellings, 21 April 2015.
- WC3 Sandy Lane – Resolved to grant full consent for 63 dwellings, 21 April 2015.

Details of the status of all LPP2 allocations are included in the Council's relevant settlement Further Statements. The Inspector's questions include reference to the deliverability of sites, so this will be a matter to be explored at the examination hearings. The Council agrees that Silver Hill is unlikely to contribute to 5-year land supply, although it is still expected to contribute approximately 300 dwellings during the Local Plan period (see Background Paper 1 paragraphs 6.27 – 6.36 and Background Paper 3 – OD15).

It is noted that Drew Smith's assessment of the contribution of LPP2 sites (SPRU) concludes that no completions whatsoever will be achieved on the LPP2 sites listed in either of the 5-year periods (2015-2020 and 2016-2021). This illustrates the lack of credibility that can be attached to the respondent's evidence when, of the 13 LPP2 sites mentioned (excluding Denmead Neighbourhood Plan sites), 4 now have consent (subject to S106 agreements), 5 more are currently subject to planning applications, and 2 have pre-application schemes under consideration.