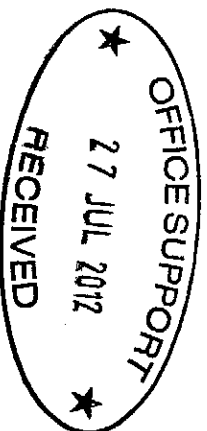


Winchester Heritage Centre
32 Upper Brook Street
Winchester
SO23 8DG
01962851664
secr_relay@cityofwinchestertrust.co.uk

Chairman: Keith Leaman



July 27 2012

Dear Mrs. Morton,

Submission of Winchester District Plan Part 1 – Joint Core Strategy

I enclose, on behalf of the City of Winchester Trust, comments on the Strategy, updating those made at the Pre-Submission stage in March.

Yours sincerely,



H.R. Cole
(UID No. 3145)

Mrs. Rosemary Morton
Programme Officer
Winchester District Local Plan – Joint Core Strategy
Colebrook Street
Winchester
Hampshire
SO23 9LJ

PRESIDENT
His Honour Judge Christopher Clark QC
VICE PRESIDENTS
The Lord Ashburton KG KCVO DL
Sir Donald W Insall CBE FSA RWA FRIBA FRFP SPdip(Hons)



THE CITY OF WINCHESTER TRUST LTD
www.cityofwinchestertrust.co.uk
Registered in England No 609812
Registered Charity No 251798
Supported by Hampshire County Council
& Winchester City Council

Summary of comments

1. The Local Plan Part 1 must satisfy four criteria before it can be adopted by the Council. It must show that:
 - a. It is based on robust and up-to-date evidence
 - b. It is capable of being delivered and monitored
 - c. It is consistent with national policy
 - d. It is legally compliant
2. More specifically, paragraph 14 of NPPF provides that Local Plans 'should meet objectively assessed needs with significant flexibility to adapt to rapid change' (unless there are adverse impacts resulting which would outweigh the benefits).
3. We consider that the Joint Core Strategy as submitted is not fully supported by robust evidence, and that on some matters the evidence provided is inadequate or unreliable.
4. We also believe that it lacks the necessary degree of flexibility, and that the relationship between various elements of the policy has not been properly appreciated.
5. It is of course the case that crystal balls with a range of 20 years are unlikely to become available any time soon, but the extent and frequency of adjustments to important projections do not encourage belief in the robustness of the Plan.
6. To take a few examples;
 - a. In 2008 WCC commissioned a study of the likely future pattern of growth in employment in the District. This recognised 'the global slowdown in economic activity', but considered that the trends identified in earlier work would 're-emerge in broadly similar form in the longer term'. In 2012 Background Paper 4 reported that this 'so far has not been the case'.¹
7. Meanwhile, a further study had been commissioned in 2010. The Background Paper summarises the outcome:

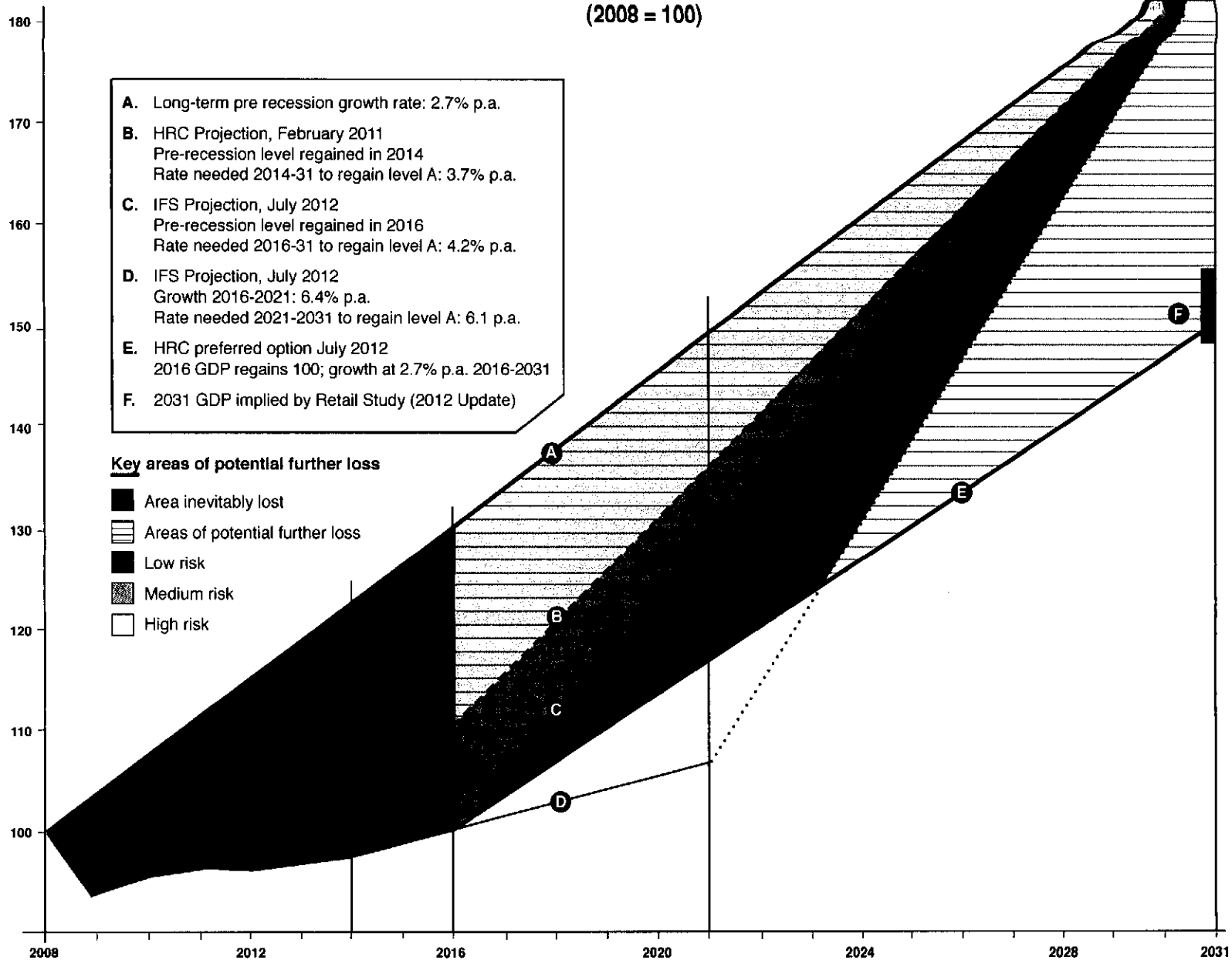
The Review took into account both the current economic forecasts and the recent changes in Government economic and planning policy. The forecast is that growth in employment in the District over the next 20 years is projected to be around 9,270 jobs by 2031 (or a 13% increase) (DTZ Study 2011, Figure 2.7). This is down on previous forecasts, which projected a growth of around 10,770 new jobs by 2026.
8. The phasing minimises the effect of the reduction: growth of 9,270 jobs is actually over the 22 years 2009-31 and is directly compared with the previous prediction of 10,770 over the 17 years to 2026 – a fall of a quarter in the annual rate. (Modification 19 simply deletes all references to a specific figure for future jobs).
9. Not surprisingly there has also been a reduction in the amount of additional land identified for employment use – to which the trend for it to be used more intensively has contributed. In figure 3.7 of their Report of August 2011, DTZ conclude that the requirement for additional employment land between 2009 and 2031 at 15.7 ha. as against the estimate made (by other advisers in 2007) of 44 ha. for a shorter period.
10. The largest adjustment has however been in the forecast of need for additional retail floorspace in Winchester. In their 2010 update of an earlier (2007) Retail Study, consultants NLP reduced their

¹ Paragraph 2.14.

- earlier estimate of a requirement for 36,524 sq.m. between 2010 and 2026 to 'about' 12,000 sq.m. by 2031, of which some 9,000 sq.m. by 2031 replaced 22,000 sq.m. in the Winchester Urban Area for 2026.²
11. Modifications 20 and 38 strike out the original numbers in each case and insert the lower ones, together with some redrafting of the supporting text.
 12. But this is the most important of the downward revisions quoted here, which have all occurred before the first two years of the 20-year Plan period have even elapsed.
 13. The 'knock-on' effects are dramatic and have been overlooked.
 14. The reduction in floorspace required would of course be even greater if NLP had maintained their previous projections of growth in extending the end date of their analysis to 2031. I calculate that this would have produced a total estimate from 2010-31 of 54,000 sq.m.
 15. The importance of this is that while turnover in shops is directly related to incomes, the amount of floorspace needed is a good indirect measure of national income on GDP. (I should emphasise that the latest NLP estimates are almost precisely in line with those I put forward in our representations in March).
 16. The lower expenditure now forecast as going to shops in 2031 correlates to a rise in GDP to around 50 per cent above its pre-recession (end of 2007) level. The attached chart updates that accompanying our March comments at the Pre-Submission stage.
 17. The reduction below the projected 2031 level had growth continued at its long-term average of 2.7 per cent is about 20 per cent. This shortfall must have consequences for many of the activities beyond shopping that the Plan has to cover. As I show elsewhere in this document, pressure on services, particularly in the public sector, will continue to be severe throughout the first half of the Plan period.
 18. This puts an even greater weight on the need for flexibility, and greater awareness of the interaction between the various activities covered by the Plan. This is best encouraged by setting figures (for the provision of houses, shops, employment land and various services) that can be regarded as being at the top end of any reasonable range, and clearly phased over the life of the Plan. That also makes the important activity of monitoring progress easier, and reflects the likelihood that changes will more often be downwards than upwards – which can be more difficult to accommodate.
 19. In an era of rapid and increasingly unpredictable change, a Plan based on 'up to' rather than firmly fixed objectives is the only realistic approach.
 20. We do not underestimate the risks and difficulties in dealing with highly volatile conditions while attempting to prepare a coherent and robust longer-term Plan. As we show, in addition to the example of employment projections quoted above,
 - The need for additional employment land in the Plan period was cut back by 64 per cent between 2008 and 2011.
 - The scope for more retail floorspace in 2031 was reduced by 83 per cent between 2010 and 2012.In the light of updated assessments by consultants.
 21. One major uncertainty is however likely to be clarified before the opening of any Examination in Public of the submitted Plan: the future role of the proposal for development at Barton Farm, a matter on which the Trust will update its own views once the details of the Secretary of State become known.

² Paragraph 2.18.

GDP PROJECTIONS: 2008 - 2031
 (2008 = 100)



Housing provision

1. The NPPF lays down new conditions for establishing the adequacy (or otherwise) of a supply of land to meet housing requirements.
2. In applying this to Winchester the revised tripartite division of the District needs to be given full weight. Land supply within each of the three areas must be assessed against the requirements for housing within that area. A potential shortfall of provision is not to be met by transferring to it part of the allocation of one of the others. This principle is implicitly accepted by WCC when it contends that the potential under-provision in the MTRA could be met by increasing the proposed figure in the Plan of 1,500 dwellings: there is no suggestion of increasing numbers in Winchester Town or the South Hampshire Urban Area instead.

Table 1: Housing provision 2001 – 2031

- a. Completions in district; 2001-2 – 2010-11

	2001-2	366
	2002-3	506
	2003-4	603
	2004-5	694
	2005-6	490
Average		532
	2006-7	496
	2007-8	562
	2008-9	359
	2009-10	286
	2010-11	503
Average		441

Background Paper 1, p.58

- b. Projections 2011-2031

Housing Technical Paper				‘Trajectory’: Appendix C Background Paper 1	
District*	Average	Town*	Average	Of which Barton Farm	District
					Average
2011-16	2,000 (400)	725 (145)	150 (30)	2,306 (461)	
2016-21	2,900 (580)	1,060 (210)	1,150 (230)	4,481 (896)	
2021-26	3,150 (630)	1,145 (230)	650 (130)	3,183 (636)	
2026-31	2,950 (590)	1,073 (215)	50 (10)	1,031 (206)	

* Original figures for each period adjusted to allow for 5% of requirement in 2016-21 to be moved to 2011-16 in accordance with NPPF.

3. I comment on these figures under ‘Phasing’.

The provision of 11,000 dwellings across the District over the Plan period

4. Evidence continues to emerge showing that 11,000 is at the top of any reasonable range. As we pointed out in our representations on the JCS, the Council's consultants, DTZ, advised some deliberate indecision as to whether the 11,000 should be described as a target or a ceiling. The recommended flexibility they encouraged is now all the more important given the further deterioration in the economic and financial outlook since the DTZ report was published a year ago.
 5. At paragraph 3.35 of Background Paper 1, WCC repeats its earlier argument that an analysis made by DTZ had validated the figure of 11,000 for scenario 1.

'Some of those promoting a higher housing requirement suggested that other Housing Technical Paper scenarios should have been selected, namely scenarios 3 (economic-led) or 4 (affordable housing-led). The DTZ Study (Review of Employment Prospects, etc, August 2011) had updated the information which was included in the Housing Technical Paper and this showed that this projection, being economically-led, would be significantly affected by the change in economic circumstances. The DTZ report concluded that updating this scenario would result in an annual requirement of 580 dwellings per annum (11,600 over 20 years), which is *broadly in line with the Council's proposals to make provision for 550 new homes per annum*'. (DTZ Study, paragraph 4.4.2)'
 6. We therefore need to repeat our comments made in March, and emphasise them;
 - a. DTZ were assessing the so-called scenario 3, which presented a strategy of maximising economic development in the District, and which had produced an estimate that this would support provision of 782 dwellings in each year of the Plan period.
 - b. DTZ's assessment was that the weaker economic outlook would reduce this to 580.
 - c. WCC seized on this to proclaim that 580 was sufficiently close to the 550 in scenario 1 to confirm the reliability of that figure.
 7. DTZ's Report appeared in August 2011, which is **after** the publication of the WCC Housing Technical Paper in June 2011. They had been asked to consider scenarios 2 and 4 as well as 3, but not scenario 1, the Council's preferred option.
 8. Scenario 3 relied heavily on inward migration. But so does scenario 1 – to the extent that two thirds of the housing it would provide are assumed to be for migrant households. No revision of scenario 1 was asked for, but it is clear that would also show an appreciable reduction. It is contradictory to suggest that, even in the worsened economic recession than we have been undergoing, a policy of deliberately encouraging development would result in only 30 (580 – 550) extra households coming into the area each year. There is a clear indication that DTZ would have raised the effect of reduced inward migration in any examination of scenario 1 in comments from their Report set out on p. 3 of our representations at the Pre-Submission stage. (q.v.)
- ### Phasing
9. The trajectory of delivering the 11,000 dwellings shown in Appendix C of Background Paper 1 differs appreciably from the phasing set out in the Housing Technical Paper of June 2011. (The alternative, assuming 'Stronger Market Conditions' actually delivers all 11,000 by 2024).
 10. The figures are compared in Table 1, and the most striking factor is the projection for 2016-21 of almost 900 a year. This is some 50 per cent above the peak years of 2002-5 when the housing market enjoyed a runaway boom (headed for eventual disaster) fuelled by rising incomes and over-easy finance. (While this is accounted for by the construction of SDAs at Watlingtonville and North Whiteley, the contrast with Appendix C showing over 70 per cent of the total between 2011 and 2021 against only 55 per cent in HTP is not explained.)

11. They may prove beyond the capacity of the building industry. The Government has announced that the programme of public spending cuts will continue for an additional two years, into 2017-18, and that debt will peak at least £120 billion higher than originally planned. Less than 15 per cent of the cuts announced in 2011 have so far been carried out and the Prime Minister himself has predicted that austerity will continue until at least 2020-21.

12. The current view of leading accountants of the future of the housing market is set out below, indicating that lack of effective purchasing power is likely to keep the market subdued.

PwC predicts a two-decade wait for house prices to recover

Independent, July 14 2012

By RUSSELL LYNNCH

House prices will take nearly two decades to fully recover the damage wrought by the recession and financial crisis, accountants Price Waterhouse Coopers (PwC) said today.

Its latest UK economic outlook predicts average house prices will not reclaim their 2007 highs until 2017 in cash terms. But adjusted for inflation, it will take until 2024 to reclaim their pre-recession values, PwC said.

Chief economist John Hawksworth said: "Over the next couple of years, we expect the UK housing market to remain relatively flat while economic uncertainty persists.

"As house prices are likely to stay high relative to earnings by historic standards, and credit is likely to remain less readily available than before the crisis, we estimate a single person leaving university today is unlikely to be able to afford their first house until their late thirties without financial assistance from their parents or others."

13. Another peculiarity of the 'trajectory' is the projection of a housing supply in 2026-31 of only just over 200 dwellings a year – below even the lowest figure in the current decline. This suggests another crash in the final years of the Plan.
14. It is not clear on what 'robust evidence' Appendix C is based, but it appears improbable of achievement. The trajectory that can be calculated from the Housing Technical Paper appears more plausible, but the figures for 2011-16 and 2016-21 are likely prove over-optimistic. The HTP shown that 42 per cent of the population increase over the Plan period is expected to occur in the first 10 years, and a phrasing to reflect this more closely would seem reasonable.

Availability of infrastructure

1. GDP is now expected not to regain its 2007-8 level until around the end of 2015 rather than by the beginning of 2014. The chart on a previous page, updated from March 2012, shows a slightly worse position, and my 'best' projection is now that GDP will recover to its pre-recession level at the end of 2015, and is then unlikely to do better than to revert to its long-term average between then and 2031.
2. This means that all the area between line A and the solid line between 2008 and 2015 has been irretrievably lost and that there is a further potential loss of the area between line A and actual performance between 2016 and 2031.
3. On my preferred estimate (line F) that loss would amount in total to (a) between 2008 and 2016 nearly 1.5 times 2007's GDP plus (b) a further three times as much between then and 2031, a total of over £600 billion.
4. (It will be seen that the level of GDP in 2031 implied by the second update of the Retail Study by NLP is close to the preferred projections.)
5. The outlook must raise particular concerns as to the affordability of the necessary infrastructure to support the scale of proposed housing development, particularly as much of this will fall to be provided through the public services.
6. I set out an extract from a recent study by the Institute for Fiscal Studies which highlights the problem of financing the public services over the next eight or nine years – particularly if any priority is given to maintaining real levels of spending on the NHS and education.

The government is planning to cut total public spending in real terms by an average of 0.9 per cent a year over the two years 2015/16 and 2016/17. Within this, spending on welfare benefits and debt interest payments are forecast to continue increasing which, if unchecked, would leave public services facing deeper cuts. Even if the government were to implement welfare cuts of £8.5 billion (in today's terms) in 2016/17, as mooted by the Chancellor, George Osborne, in his March 2012 Budget speech, spending on public services in the UK would still need to be cut in real terms by an average of 1.7 per cent a year over 2015/16 and 2016/17 to keep to the current spending plans.

If total public spending were increased in line with national income beyond 2016/17, it would grow by an average of just 1.2 per cent a year over the seven-year period 2014/15 to 2021/22 with spending on public services growing by an average of 1.1 per cent a year in real terms over this period.

If total public spending were increased in line with national income beyond 2016/17, it would grow by an average of just 1.2 per cent a year over the seven-year period 2014/15 to 2021/22

However, the outlook for economic growth is uncertain. Should average economic growth fall short of the official forecasts then the amount available to be spent on public services would be even lower.

Amendments to Modifications to Policies suggested in representations at Pre-Submission stage.

Policies	Maintained	Comments
DS1	Maintained	
WT1 (Housing), WT2, CP1	Maintained	The addition of 'up to' is compatible in principle with the decision of the Inspector at the EIP of the West Berkshire Core Strategy to amend 'approximately' to 'at least' for proposed housing numbers Comments on WT2 assume that planning permission for development at Barton Farm is granted. ³
M TRA2	Maintained	As drafted this provides for between 1,700 and 2,500 homes in these settlements, whereas Policy CP1 sets a level of 1,500. WCC response to objections to the figures (paragraphs 5.44-45 of Background Paper 1) relies on the potential use of Neighbourhood Plans to implement increased provision. This is not convincing, and could create a precedent for other parts of the District to take similar action.
W11 (Retail)	Withdrawn	The Retail Study update of May 2012 eliminates the previous gross overprovision. With only 12,000 sq.m. of additional floorspace over 20 years (and little required until after 2021) the need suggested by PINs for specific identification of potential development sites is also now unnecessary.
CP3	Maintained	The assertions in Policies and amendments to the supporting text, while welcome, do not resolve the erratic relationship between the overall housing requirement in the Plan and the number of affordable houses to meet existing demand. We put continued emphasis on our comments at pp. 13 – 14 of our Representations at Pre-Submission stage.
New Policy	Maintained	A formal Policy to support the monitoring framework described in paragraph 8.2 is essential in the light of the particularly uncertain outlook for the Plan period.

³ In Appendix 2, I deal with the matter of land supply and its adequacy in the context of Winchester Town and Barton Farm not being approved.

Appendix 1; Retail

1. Paragraph 2.7 of the Joint Core Strategy says:

The updated Retail Study* identifies the need for substantial additional retail floorspace (in the region of 22,000 sq.m.) in the Town during the plan period over and above that already permitted at Silver Hill and Weeke, which are expected to accommodate growth in the short to medium term.

These figures clearly relate to the period to 2026, as can be seen from Tables 10b and 8c of the Retail Study (update) of October 2010.

At paragraph 3.18 the JCS says:

The Retail Study* suggests that there is expected to be a need for 36,524 sq.m. of new retail (A1) floorspace across the District to 2026 (4,686 sq.m. of convenience floorspace and 31,840 sq.m. of comparison floorspace), taking account of commitments at the time.

*(2010 Study)

2. The Proposed Modifications reduce the need for additional floorspace across the District to about 12,000 sq.m. by 2031 (Mod 20) and to 9,000 sq.m. (Mod. 38) for 'the Town', without differentiating between convenience and comparison sectors.
3. Table 5.1 from the Retail Study of May 2012 set out below, shows the composition of the latest estimates (it may be noted that Table 10.b shows an overprovision of convenience floorspace in the Winchester Rural Area of almost 3,300 sq.m. by 2031).

Table 5.1 Class A1 Retail Floorspace Projections

Location	Floorspace sq.m. net (sq. ft net)		Total
	Convenience	Comparison	
Up to 2021 (taking account of commitments)			
Winchester Urban Area	-	3,338	3,338
Winchester Rural Area	-	448	448
Whiteley	-	-	-
Total	-	3,786	3,786
Up to 2031 (taking account of commitments)			
Winchester Urban Area	1,125	7,821	8,946
Winchester Rural Area	-	1,042	1,042
Whiteley	-	1,904	1,904
Total	1,125	10,768	11,892

Source: Appendix B, Table 10B and Appendix C, Table 10C

*Figures are net floorspace. For consistency, when deriving the gross floorspace apply a 70% net to gross ratio. Low growth scenario up to 2031 for comparison goods

4. In my response to consultation on the WCC document 'Plans for Places' (August 2011) I questioned the assumptions on which the NLP update of 2010 had been based, and made an alternative calculation, using what I considered to be more realistic projections, for the additional floorspace required in the City Centre by 2026. The figure I put forward was about 6,175 sq.m. (excluding existing commitments).

5. About 500 sq.m. should be allowed for the urban area outside the City Centre, and 3% of the 2026 total for growth to 2031, thus making a total requirement of 8,000 – 8,500 sq.m. for the whole period 2010 – 2031 (excluding existing commitments).
6. This is slightly above the figure of 7,821 sq.m. in the second update of the Retail Study.
7. I therefore accept that the latest estimates by NLP are reasonably reliable.
8. But the downward revisions in floorspace requirements directly reflect a sharp fall in expected levels of expenditure, and also the ability of the retail trade to provide employment growth.
9. The successive reductions in the need for future floorspace imply a fall in the prospective level of spending in the shops of around 20 per cent in 2031, in real terms, from the level originally predicted by NLP in 2010. That assumes that existing floorspace continues to increase turnover at the previously predicted rates, which must be open to question. The Retail Study in fact assumes growth of 1.7 per cent per sq.m. per annum (instead of 2 per cent previously for comparison goods) and no annual increase at all (instead of 0.3 per cent for convenience space).
10. If the shortfall is in fact 20 per cent, then retail expenditure in 2031 would only reach the levels forecast by NLP for 2026 in their first update.
11. This is consistent with my projection of GDP recovering to its 2008 level by 2016, and then growing by 2.7 per cent a year – its long-term average.
12. On the assumptions made in the 2010 Retail Study there would be an apparent requirement for a further 18,000 sq.m. throughout the District until 2031, implying a total addition between 2010 and 2031 of some 54,000 sq.m. – 4.5 times the figure now being proposed.
13. If retail floorspace in the District grows at the now projected 13 per cent between 2010 and 2031, instead of the previously projected near-40 per cent, it is to be expected that employment will lag comparably. Figure 3.1 in the DTZ Study of Employment Prospects of August 2011 predicted a rise from 8,320 to 9,390 for jobs in retail and distribution between 2009 and 2025. By 2031 that would indicate a total of about 9,550. Thus, 800 of those might not become available, with some further loss among associated occupations – a possible loss of perhaps 1,000 in all.

Appendix 2: Calculation of Land Supply Land Availability to meet Housing Requirements over the Plan period

Proposed development at Barton Farm is intended to meet half the demand for new dwellings in Winchester Town up to 2031.

The availability of suitable housing land needs to be considered in detail for the five years 2012-17, and, in broad terms, for the following five years.

Demand

The 4,000 dwellings would not be provided equally over each of the five-year periods of the Plan. The original projections for the District as a whole indicated the share of the same 11,000 total in each successive period as:

2011-16	17.3%
2016-21	27.3%
2021-26	28.6%
2026+	26.8%

Over the whole 20 years the share of Winchester Town in the total is 36.4%.

It is necessary to:

- a. Move the figures forward to take account of the current 5-year period now running from 2012-17, with consequent alteration to the later periods;
- b. To move forward 5 per cent of the figure from 2017-22 to 2012-17 to conform to the requirement in para. 47 of NPPF.

Allocating the 4,000 required dwellings at 36.4 per cent of the resulting totals for each period to Winchester Town produces the pattern below:

2012-17	725
2017-22	1060
2022-27	1145
2027+	1075

Note: Very similar figures are produced by calculating Winchester Town's 'share' by reference to other alternative sub-totals, e.g., District less PUSH; District less National Parks or District less National Parks and PUSH.

Supply

There are five sources of land supply to be considered:

- Major developments with planning permission
- Smaller schemes with planning permission for 6-14 dwellings
- Sites included in the Strategic Housing Land Availability Study for development between 2012 and 2017
- Windfalls
- Affordable housing to be provided by WCC by 2022.

A. Major sites

There are three of these:

Silver Hill	307
Pitt Manor	200 (Permission granted on appeal, January 2012)
Francis Gardens	90 (under construction)
	597

B. Smaller schemes

Nine have been identified, with combined provision for 90 dwellings, and having planning permission.

C. Sites included in SHLAA for 2012-17

The Annual Monitoring Statement for 2011 (published by WCC in January 2012) shows, at Table 9, 213 sites included for development between 2012 and 2017. It is estimated that 75 are within Winchester Town.

D. Windfalls

As the AMR was published before the appearance of NPPF, it follows earlier advice and makes no allowance for windfall sites, in accordance with para. 59 of PPS 3. However, para 83 of APR states that windfall sites 'have traditionally formed a significant and consistent component of land supply' and that continued provision would have been made but for the then operative Government advice. Provision is therefore now justified in terms of para. 48 of NPPF. It is understood that in the past windfalls have accounted for up to 40 per cent of total housing provision in the Winchester area. A third would provide 300 in 2012-17 (and a further 400 between 2017 and 2022). Such an estimate is in accord with the conditions set out in para. 48 of NPPF, excluding the development of residential gardens. I note, but do not take into account here, that the CPRE suggest that there is no legal objection to including an allowance for dwellings on residential gardens, which could double the figures above, but which is also a 'wasting asset'.

E. Affordable housing

In April of this year, WCC entered into arrangements which will enable it to provide 300 affordable dwellings in the District between now and 2022. As it has secured the necessary finance and will be in control of the development, it is in a position to ensure that these homes will be built.

Approximately half, or 150, may be expected to be provided in Winchester Town area, and 70 of these within the first five years, with the remaining 80 between 2017 and 2022.

Summary of prospective supply, 2012-2017

A	597 ⁴
B	90
C	75
D	300
E	70
Total	1,132

(Excluding homes built but not yet occupied)

A further 480 sites can be identified beyond 2017, bringing the total to just over 1,600.

D	400
E	80
Total	480

Land supply

1. I have suggested that the scale of housing provision within the Plan is acceptable but that a realistic approach – as encouraged by the NPPF – indicates a different phasing from that set out in HTP and Appendix C to Background Paper 1.
2. It must also be remembered that putting numbers into plans does not, of itself, produce homes on the ground. Given the current and prospective economic climate, I consider that it would be realistic to apportion the overall housing provision in Winchester Town between the first and second halves of the Plan period more closely in line with the predicted population growth in those ten-year periods.
3. That would mean allocating the 4,000 dwellings in total as to 1,600 in 2011-21 and 2,400 to the following 10 years.
4. Realism also suggests that calculation of a five-year supply of land must take into account practicalities, such as the achievable rate of building. It would make little sense to impose a requirement for a five-year supply to be calculated on the total provision to be made over the full 20 years, where a disproportional share of that total is being phased for the last few years of the Plan.
5. It would be even more peculiar if a local authority decided to extend a Plan already approved from a 15 to a 20-year life, with a higher rate of house building in the extra five years, only to find that the previous satisfactory five-year supply calculation was now found unacceptable for the yearly years as a result.
6. The phasing suggested above would provide for annual construction of an average of 160 dwellings, thus ensuring a supply into year six in conformity with NPPF, with the position being updated annually as required.

⁴ There is also an existing permission, which has been renewed, for 294 dwellings on the site of the present Police HQ in Romsey Road. However, this has been excluded from the calculations because the original proposals of Hampshire Constabulary for relocation to Eastleigh, are not now being pursued. However, alternative arrangements may result in part of the site becoming available for residential development, but this is unlikely to occur before 2017, and may therefore come forward between then and 2022.