

Session/Issue 1

Strategy/Vision/Sustainability – Policy DS1

- i. Does the Joint Core Strategy (JCS) provide an appropriate spatial vision for the district over the plan period, consistent with national guidance in the NPPF and/or justified by clear and robust evidence and, if not, what is the best alternative and why?*
1. The JCS does not provide an appropriate spatial vision for the district. Despite the clear sustainability advantages of locating development in Winchester, the spatial planning vision for the town seeks only to meet its own housing needs. Such a strategy fails to take into account Winchester's role in supporting its wider hinterland.
 2. Whilst it is acknowledged that the spatial planning vision provides for development within the market towns and villages, such development is necessarily limited in scope to that which would retain the rural character and individual identity of the area. An added level of protection will also be applied to development within the South Downs National Park. Bovis Homes and Heron Land Developments therefore maintain that it is highly unlikely that the housing needs arising from these areas will be capable of being met. As no allowance has been made for this need in the housing requirements for Winchester Town, this need is likely to go unmet in the long term.
 3. Paragraph 2.11 of the JCS notes that Winchester Town is a sustainable location for growth and change as the largest settlement area in the District and a hub for many services and facilities, which benefit residents and businesses in the District and beyond.
 4. The NPPF requires that the plan be positively prepared i.e. 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. This principle should apply with respect to the development needs of the South Downs National Park Authority. As the most sustainable centre in the District, Winchester Town should be the focus for additional development.
 5. As currently drafted, the spatial planning vision is unsound as it is neither positively prepared nor justified and should be amended as follows:
 - The County Town of Winchester needs to meet the housing, employment and community requirements generated within the town and its wider hinterland and to diversify its economy through the promotion of the knowledge, tourism, creative and education sectors, whilst respecting the highly valued features and setting of the Town.

- iii. Will the strategy satisfactorily and sustainably deliver the new development needed to meet the objectives over the plan period and, if not, why not and what needs to be changed?*

Housing Requirement

1. Bovis Homes and Heron Land Developments object to the level of housing development proposed for Winchester Town in Policy DS1 on the grounds that it is inadequate to meet the needs of the community.
2. It is widely acknowledged that the acute shortage of affordable housing, the high levels of in-commuting and the imbalance between housing and jobs are key issues that need to be addressed as part of the future strategy for the District as a whole and Winchester Town in particular. The housing requirement proposed in Policy DS1 will do little to address these problems.
3. The National Planning Policy Framework confirms that the Government's key housing objective is to boost significantly the supply of housing (paragraph 47). Local planning authorities are required to use their evidence base to ensure that their Local Plan meets the full requirements for market and affordable housing in the housing market area.
4. The housing requirement for the period 2011-2031 set out in Policy DS1 was derived from the Office for National Statistics (ONS) 2008 based Sub-National Population projections and takes into account births, deaths and migration. The results suggest a district wide population increase of 16,550 generating a requirement for 11,000 additional dwellings by 2031.
5. The disaggregation of the district wide figure into each of the spatial areas on the basis that it will simply maintain the existing spatial distribution of housing stock in the district will simply exacerbate current problems. This runs counter to the advice set out in paragraph 4.19 of the Housing Technical Paper which states, 'any breakdown of the District-wide housing need should seek to avoid calculating sub-District figures simply on the basis of the existing population or geographical extent of the relevant sub-area. To do this could ignore local characteristics, policy context and needs.' This approach clearly ignores the particular need for additional housing in Winchester Town.
6. In respect of Winchester Town, Policy DS1 refers to the provision of 4,000 homes to meet the needs of the whole community (my emphasis). However, the Council acknowledge that the housing requirement for Winchester Town has been derived based on the existing spatial distribution of housing stock, not the needs of the town. Without identifying what the needs of the community are, it is not possible to plan to meet them. The City Council's approach does not constitute an objective assessment of development needs and therefore the policy as drafted is unsound as it has not been positively prepared. With, the significant numbers on the housing waiting list and with a jobs density of 1.16 (significantly above that of the South East 0.8 and Great Britain 0.77) the levels of development proposed in Policy DS1 will not meet the housing needs of the whole community.

7. It is noted that the Winchester Town Profile produced by the City Council as part of the initial Blueprint consultation exercise (December 2010) included a population projection based on the South East Plan housing requirements, using Hampshire County Council's population projections for Winchester to 2011 and then applying a housing growth rate in proportion to the Winchester District housing requirement in the South East Plan to 2026. This suggested the need for an additional 277 dwellings per annum. If this rate of development is taken forward to 2031, the housing requirement increases to 5,540 for Winchester Town.
8. Economic factors also need to be taken into account in determining the housing requirement. Paragraph 3.16 of the JCS confirms that about half of the jobs available in the District are provided in Winchester Town. Furthermore paragraph 6.6 of the Housing Technical Paper notes that the jobs/worker imbalance is especially pronounced in Winchester Town indicating a need for additional housing. Bovis Homes and Heron Land Developments therefore consider that there is a particular need for further housing development in Winchester Town to support its continuing economic prosperity. An allowance should be made to the overall housing requirement in addition to that indicated by the population projections.
9. Bovis Homes and Heron Land Developments consider that the proposed housing requirement for Winchester Town (4,000 dwellings between 2011 and 2031) will not meet current levels of need and will do little to resolve issues associated with the current housing and economic imbalance or affordable housing shortage. Policy DS1 should therefore be modified such that Winchester Town will make provision for at least 5,500 new homes over the period 2011-2031.

Economic Growth and Diversification

10. It is not clear how Policy DS1 will support the delivery of economic growth and diversification, as it does not specify the requirement for additional employment floorspace over the plan period. The Council's initial proposals for a knowledge park at Bushfield Camp have proved to be undeliverable and hence the JCS no longer includes a strategic employment allocation. Despite the current economic downturn, there remain cogent reasons to support economic growth and diversification, not least of which is the need to better align the jobs in Winchester with the resident workforce and thus reduce levels of commuting. Bovis Homes and Heron Land Developments have consistently promoted land North of Winchester as being an appropriate location for a strategic employment site.
11. The Government recognises in the NPPF that planning should operate to encourage and not act as an impediment to sustainable growth therefore significant weight should be placed on the need to support economic growth through the planning system. In drawing up Local Plans, local planning authorities should set criteria, or identify strategic sites to meet anticipated needs over the plan period. It also notes that policies should be flexible enough to accommodate needs not anticipated in the plan period and to allow a rapid response to changes in economic circumstances. They should also plan positively for the location of knowledge driven industries (paragraph 21).

12. Policy DS1 is unsound as it is neither positively prepared, justified, effective or consistent with national policy. The Policy should be modified to specify the employment floorspace requirement over the plan period and the requirement for a strategic employment site for knowledge driven industries.
- v. *Is there clear evidence demonstrating how and why the preferred strategy was selected, including in terms of appropriate consultation with the public, representative bodies, neighbouring authorities, service and infrastructure providers and other interested parties?*
1. It is not clear how and why the preferred strategy was selected. The available evidence does not support it as being the most appropriate strategy when considered against the reasonable alternatives. Furthermore, in a number of cases the evidence base does not reflect the different spatial policy areas identified in the JCS and therefore it is not possible to identify and address the specific issues arising in each of the areas.
 2. The recently published Winchester Housing Market and Housing Need Assessment Update produced by DTZ in 2012 is a case in point. The evidence is not presented in a way that enables an understanding of the extent of specific housing need in each of the spatial areas as the housing figures are presented as district totals.
 3. The report suggests that the district need for subsidised rental accommodation and intermediate homes equates to around 519 affordable homes per annum. The need for a significant proportion of these homes is likely to arise from Winchester Town (this is acknowledged in Appendix E of the JCS), although it is not clear precisely what this need amounts to, as this information has not been provided. Bovis Homes and Heron Land Developments maintain that this information should have been used to inform the spatial distribution of housing provision over the plan period. It is clear however, that with an annual requirement of only 550 dwellings across the District, the level of provision required will not be achieved leading to growing levels of unmet need.
 4. It is also questionable as to how the evidence on economic development has been used to inform the JCS. The Spatial Planning Vision acknowledges that Winchester Town needs to diversify its economy and the Spatial Planning Objectives seek to ensure that there are a range of sites and premises available for businesses and commercial enterprises to set up and expand to meet their full potential.
 5. The Review of Employment Prospects, Employment Land and Demographic Projections (DTZ 2011) recognises that there could be a case for increasing the floorspace in Winchester Town to avoid the risks to the town's economy. This is consistent with the work on the emerging Vision for Winchester, which emphasises the importance of providing new, higher quality, employment provision within the town to attract private sector business growth in the medium term (paragraph 2.22 Background Paper 4).
 6. Bovis Homes and Heron Land Developments support the principle of economic growth in Winchester town particularly in higher value added and

knowledge based activities, to provide a better balance between jobs and housing and to help reduce commuting out of the town. The allocation of sufficient deliverable land to ensure that the economy is allowed to diversify and build on its strengths is therefore essential.

7. The JCS does not include a strategic employment allocation. Bushfield Camp was previously allocated as the preferred location for a knowledge park, however the site has now simply been included as an 'opportunity site'. There can be no certainty that any development will come forward on the site. Bovis Homes and Heron Land Developments maintain that the need for a 'knowledge park' still exists and that this should be provided for on land north of Winchester.
8. The Economic and Employment Land Study (EELS) and Supplementary Report (EELSSR) considered the potential of north Winchester to accommodate a knowledge park. The EELS (October 2007) concluded that provision of additional employment land for knowledge based activities, as part of a mixed-use urban extension at Winchester North would contribute to the overall sustainability of future development.
9. The EELSSR (2009) notes that a major mixed-use development at Barton Farm would potentially attract some of the 8,600 workers who currently commute out of the town mainly to higher end jobs in London and Basingstoke. A knowledge based business park located on land north of Winchester could offer higher end jobs that would tend to further reduce upper end out-commuting to the north. The Economic and Employment Study concluded that the Barton Farm area has 'strong potential for the development of a knowledge based business park' (paragraph 4.23).
10. By locating a knowledge park on land north of Winchester alongside the residential development of Barton Farm as part of a wider mixed use allocation it would be possible to improve the efficiency and viability of bus services linking the site to the town centre and railway station thus reducing the need to travel by car in accordance with key principles outlined in the NPPF.
11. In order for a Core Strategy to be found 'sound' it must be justifiable, i.e. founded on a robust and credible evidence base and the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.
12. The available evidence on affordable housing need suggests that the overall housing allocation is inadequate. Additionally, it is not clear why land north of Winchester has been rejected as an allocation for a knowledge park as part of a mixed use urban extension. The studies commissioned by the Council identified it as an appropriate location for such a use and given the lack of certainty over development at Bushfield Camp, the JCS should include a requirement for a knowledge park on land north of Winchester.