

**Session/Issue 3**  
**Housing General – Policies CP1, WT1 and SH1**

*i. Is the overall number and the locations of new housing consistent with the JCS objectives and realistically deliverable within the plan period, taking into account the SHLAA and the opportunities identified, including in Winchester and other centres?*

1. Bovis Homes and Heron Land Developments object to the level of development proposed for Winchester Town on the grounds that it is inadequate to meet the needs of the community. 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 CP1 will do little to address these problems.
2. The overall level of development is not consistent with the JCS objectives as it will do little to address the varied housing needs of the District's residents and working population and will not ensure housing for all. Neither will it enable people to live close to where they work. The JCS acknowledges at paragraph 3.10 that about 18,000 people commute into Winchester every day, the housing requirement proposed in the JCS will do little to redress this balance.
3. The housing requirement for the period 2011-2031 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. Such an approach fails to address the current shortage of housing in Winchester. With the highest property prices in Hampshire and significant numbers on the housing waiting list, the level of additional development proposed will only exacerbate problems associated with high property prices, lead to an increase in overcrowding and reduce choice.
4. Notwithstanding the objection to the overall housing requirement, Bovis and Heron consider that the justification for disaggregating the district wide figure into each of the spatial areas set out in Policy CP1 does not appear to be sound. The City Council proposes that of the total 11,000 new dwellings required in the district, 4,000 would be within Winchester Town. Paragraph 9.5 of the Housing Technical Paper justifies this distribution on the basis that Winchester Town should continue to accommodate approximately 37% of the District's housing stock. This does not appear to be a coherent strategy for apportioning the additional housing requirement, and appears to run 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.

5. Hampshire County Council has used the Chelmer model to derive projections at the sub-district level. Table 4.8 of the Housing Technical Paper suggests that 'the Rest of the District' (i.e. the area outside PUSH and South Downs National Park (SDNP)) will generate a need for 6,550 dwellings, with a further 1,100 in the National Park. Given the way the information is presented, it is not possible to determine the housing requirement for each spatial area precisely or Winchester Town specifically, however, it would appear that outside PUSH, the evidence suggests a need for 7,650 dwellings. This is in marked contrast to the 5,500 dwellings being promoted by the City Council in Policy DS1, for Winchester Town and the Market Towns and Rural Area (including SDNP).
6. Whilst it is accepted that there are limitations to the use of these population projections at sub-district level as they are based on historic trends at a district level, they do provide an indication of latent housing need. Bovis and Heron accept that policy objectives need to be factored into the overall housing requirement in order to direct housing development to the most appropriate locations. As the most sustainable centre in the District, Winchester Town should be a focus for a significant proportion of any additional development.
7. It is noted that the Winchester Town Profile produced by the City Council as part of the initial Blueprint consultation exercise 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 4,165 dwellings in Winchester Town between 2011 and 2026, which equates to a requirement of 277 dwellings per annum. If this rate of development is pro rated to 2031, the housing requirement increases to 5,540 for Winchester Town.
8. The need for affordable housing is a function of housing supply and should be a significant factor in determining the requirement and spatial distribution of housing across the district. This is particularly relevant for Winchester Town, which has the highest average house price in Hampshire and because the shortage of affordable housing is so acute.
9. 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.

10. Notwithstanding Bovis and Heron's objection to the amount of additional housing proposed for Winchester Town in Policy CP1, Policy WT1 is insufficiently clear on how the provision of 4,000 dwellings will be delivered.
11. The policy suggests that some 2,000 new homes will be achieved through the development and redevelopment of existing premises and sites and other opportunities within and adjoining the defined built-up area of Winchester. It also allows for the development of a new neighbourhood to the north of Winchester at Barton Farm for about 2,000 homes. It is acknowledged that Cala Homes recently secured outline planning consent for 2,000 dwellings on the site.
12. It is not clear whether the defined built up area refers to the boundary as it is now or how it will be once Barton Farm has been developed. Bovis and Heron consider that as the JCS allocates Barton Farm for development and as it already has planning consent, the built up area of Winchester should be redefined to include Barton Farm.
13. Aside from Barton Farm, Bovis and Heron question where the remaining 2,000 homes are to be accommodated. Paragraph 3.13 of the JCS states that capacity for some 1,200 dwellings has been identified on sites with planning permission (at April 2011) and through the latest Strategic Housing Land Availability Assessment (SHLAA). It further states that these assessments will be updated and it is expected that some additional capacity will be identified either within the existing boundary of the Town or on small sites adjoining it which may result in about 2,000 dwellings being developed within the Plan period.
14. No information is provided on how these sites will be identified. Reference is made to the possibility of a more detailed planning document for specifically for Winchester Town however it is not clear what the nature or status of this additional planning document would be or at what point it would be prepared. The JCS should identify the broad criteria that would be used to identify the additional greenfield sites in any subsequent document in order for it to be considered to be effective.
15. The JCS is insufficiently clear on the extent of the residual greenfield housing requirement. No information appears to be available on the sources of housing land supply by each of the defined spatial areas. Information in the Annual Monitoring Report merely distinguishes between PUSH and non-PUSH making it difficult to fully understand what the likely residual requirement would be for Winchester Town that would need to be identified in a future Development Plan Document or more detailed planning document for Winchester Town.
16. Notwithstanding concerns over the availability of the relevant housing land supply information, Bovis and Heron consider that the City Council has significantly over-estimated the current housing land supply position. Comments on each aspect of housing land supply are set out below:

*Commitments*

17. Information on large sites with planning permission is available on Hampshire County Council’s website in a form which enables sites to be broken down into their respective spatial strategy areas. It is not clear whether the City Council have made any allowance for non-delivery of these sites, which is a particular issue as 73% (601 of the 818 dwellings with a current planning permission) come from just two sites – the Hampshire Constabulary HQ and the Broadway/Friarsgate development. The application for the residential development of the HQ building was originally granted in 2007 with an application to extend that permission granted last year. The Broadway/Friarsgate development is the subject of a Compulsory Purchase Order to which there are a number of objections and therefore there can be no certainty that the site will be developed until that process has been concluded.
18. No information on small sites is currently available from the City Council. The AMR includes a figure for small sites for the non-PUSH area only; it is not possible to calculate how many of these are in Winchester town. Information from Hampshire County Council suggests that there is permission for 120 dwellings on small sites in Winchester town.

*SHLAA*

19. The Council assess the contribution from SHLAA in Winchester Town as being 292 dwellings. However this includes a number of sites for which there is no developer interest and therefore it cannot be assumed that the sites are genuinely available, and sites that include public open space, sports and recreation facilities and are therefore protected under existing policy as well as JCS Policy CP7. The JCS similarly seeks to protect existing employment land and premises under CP9, again restricting the number of sites where residential development would be acceptable.
20. The capacity on a number of sites has also been overestimated particularly where an element of mixed use is proposed (e.g. the hospital sites) or due to the sensitivity of the character of the site. Having taken into account these issues, Bovis and Heron consider that a more realistic estimate from SHLAA is 110 units.

JCS Requirement Winchester Town	4,000
Commitments (large sites)	818
Commitments (small sites)	120
SHLAA	110
Strategic allocation at Barton Farm	2,000
Residual requirement	952

21. Based on the above analysis, it is clear that land to accommodate a significant proportion of the City Council’s housing requirement remains to be identified. This would be compounded if the more realistic housing requirement suggested by Bovis and Heron and supported by evidence contained in the Housing Technical Paper, of 5,500 dwellings in Winchester Town was adopted.

ii. *Does the JCS demonstrate that there will be a deliverable supply of developable new housing land over the plan period, with suitable infrastructure provision, in accordance with the NPPF?*

1. Notwithstanding Bovis and Heron's objection to the amount of additional housing proposed for Winchester Town in Policy DS1 and CP1, Policy WT1 is insufficiently clear on how the provision of 4,000 dwellings will be delivered.
2. The policy suggests that some 2,000 new homes will be achieved through the development and redevelopment of existing premises and sites and other opportunities within and adjoining the defined built-up area of Winchester. It also allows for the development of a new neighbourhood to the north of Winchester at Barton Farm for about 2,000 homes, which has recently been granted outline planning consent.
3. The JCS includes an allowance for small/unidentified sites based on previous and expected rates of development for this type of site. No evidence is provided on the historic rate of windfall development and given the inclusion of small sites without planning permission (windfall sites) in the SHLAA, there is a high risk that sites will be double counted. Furthermore, as the definition of previously developed land has been amended to exclude gardens and given the political opposition to 'garden grabbing' the contribution of this source of supply is likely to be significantly diminished in the future and not reflective of historic trends.
4. It is not clear what allowance has been made for windfall sites as the figure has been amalgamated with that for proposed allocations in Local Plan Part 2 and as it is not disaggregated into the different spatial areas. An overreliance on small windfall sites undermines the delivery of the strategic infrastructure made necessary by development.
5. Land to accommodate a significant proportion of the City Council's housing requirement remains to be identified. This would be compounded if the more realistic housing requirement suggested by Bovis and Heron and supported by evidence contained in the Housing Technical Paper, of 5,500 dwellings in Winchester Town was adopted. It is inevitable that the residual requirement will need to be met through additional greenfield allocations, for which there is no policy basis in the JCS.
6. Policies CP1 and WT1 are unsound as they are neither positively prepared or effective. The Policies should be amended to include at least 2,500 dwellings at land north of Winchester as part of a wider mixed use allocation and the boundary of the allocation should extend to the 70m contour north of Well House Lane as shown on Plan 1.

*iii. Will the intended management of new housing delivery prove adequate to ensure that the strategic aims of the JCS are met? If not, what else needs to be done and why?*

1. Paragraph 5.10 of the JCS suggests that the housing land supply position reported in the Annual Monitoring Report will be used to inform the preparation of the Local Plan Part 2. Any smaller sites necessary to ensure that the housing requirement is met will be allocated following a review of settlement boundaries. A sequential approach will be adopted whereby sources of housing supply within existing settlement boundaries will be reassessed and updated before these boundaries are extended or sites outside of them allocated.
2. The JCS does not make it clear whether the Council intend to monitor the housing land supply position for each of the spatial areas identified in the JCS. If future monitoring is undertaken on the same basis as is reported in the current AMR (i.e. PUSH and non-PUSH), it will not be possible to monitor or manage the housing land supply position for Winchester Town. Bearing in mind that the justification for disaggregating the overall housing requirement is purported to be based on the specific and distinct housing needs of each of the spatial areas, it is only right that the monitoring and management of the housing land supply position is undertaken on the same basis.
3. The latest Local Development Scheme (July 2012) suggests that the Local Plan Part 2 will be adopted in May 2015 (assuming that there will be no slippage in the current timetable). Although the LPP2 will allow for any under delivery to be rectified based on the monitoring of housing land supply in the next two years, it is not clear what procedures will be in place to manage housing land supply for the latter parts of the plan period.
4. The strategic aims of the JCS include the provision of 11,000 new homes across the District by 2031 and the provision of a range of housing types and tenures to address the varied housing needs of the District's resident and working population and ensure inclusion for all. If the JCS does not identify sites to accommodate the 11,000 new homes or identify the point at which or mechanism by which smaller greenfield sites will be required to be released, the strategic aims of the JCS will not be met.

*iv. Should the JCS address contingencies/alternatives, including in relation to the strategic allocations, in the event that completions do not come forward as expected?*

1. The JCS should address contingencies/alternatives in the event that completions do not come forward as expected.
2. Bovis Homes and Heron Land Developments consider that the JCS should allocate sites sufficient to address the current shortfall, rather than defer the decision to the Local Plan Part 2. By extending the strategic allocation at North Winchester beyond the arbitrary limit of Well House Lane, it will be possible to comprehensively plan the whole area and deliver the necessary

infrastructure. The alternative is the piecemeal allocation of a number of smaller sites which on their own are unlikely to deliver the infrastructure necessary.

3. Policies CP1 and WT1 should be amended to include at least 2,500 dwellings at land north of Winchester as part of a wider mixed use allocation.