

Issue 3 – Housing – General – Policies CP1, WT1 and SH1

Personal ID No: 3440

Terence O'Rourke Ltd on behalf of North Whiteley Consortium

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?**
- 1.1 The North Whiteley Consortium supports the approach to focusing the majority of housing provision at strategic sites and the proposed housing distribution across the district, especially concentrating 50% of the district's future housing growth in the South Hampshire Urban Area. This will help Winchester City Council contribute towards meeting PUSH's housing target.
- 1.2 Relative to the PUSH target, we would reiterate comments that have previously been made to policy DS1. There are some concerns relative to both the level of additional housing that Winchester is proposing over the plan period (2011 to 2031) for the PUSH area of the district and the broad methodology that has been used to establish such strategic PUSH figures.
- 1.3 It is acknowledged that Winchester's South Hampshire Urban Area does not cover the same area as PUSH (refer to page 34 of Background Paper -1 Housing Provision, Distribution and Delivery), whilst the JCS covers a period from 2011 to 2031 (20 years) compared to PUSH's South Hampshire Strategy October 2012 which runs from 2011 to 2026 (15 Years).
- 1.4 The JCS suggests that there will be an additional 5,500 dwellings over the plan period within the PUSH area, whilst this increases to a range of 6,540 to 7,250 dwellings when including relevant settlements that PUSH considers to fall within its area. This compares to a figure of 6,200 (Policy 11) contained within the South Hampshire Strategy. Although this might suggest that the JCS is more than satisfying the PUSH target, when regard is had to the plan periods if a simple calculation is carried out it is apparent that the JCS is actually under providing within the PUSH area by a minimum of 1,017 (8,267 – 7,250) units up to 2031. Given this, it is important that flexibility is built into the plan to allow increased provision beyond the 5,500 set out in the JCS for the PUSH part of Winchester.
- 1.5 Further, the NPPF now makes it clear that authorities should prepare a Strategic Housing Market Assessments (SHMA) that *'meets household and population projections...and caters for housing demand and the scale of housing supply necessary to meet this demand'*. This is in conflict with PUSH's pure economic approach. Further, targets should now use the 2011 census data as the starting point, whilst anecdotally it is understood the said figures demonstrate that growth has been higher than had been projected, meaning that it is likely that the PUSH, and accordingly WCC's, target is already overly pessimistic.

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- 1.6 Appreciating this, overall the strategy to respond to the targets of PUSH is considered appropriate given the extent of strategic employment areas located along the M27 corridor including, the Solent and Segensworth Business Parks which are in close proximity to North Whiteley.
- 1.7 The allocation of North Whiteley as a strategic housing site is appropriate, robust and consistent with the NPPF. The site is deliverable, it is available, suitable and achievable.
- 1.8 It is acknowledged that further detailed work is required to determine the specific level of mitigation required to mitigate potential adverse environmental impacts, including the need to fully address the issue of potential flood risk, and the need to provide adequate buffers to environmentally sensitive areas.
- 1.9 However, a considerable amount of work has already been carried out at the site to fully understand its context and constraints, particularly relative to the green capital of the site. Indeed the extensive amount of master plan work that has been carried out started from the site constraints, whilst latterly being informed by the community and stakeholder aspirations. At this point attention is drawn to the detail of the work carried out to date (refer to appendix 2 of our statement to Issue 6 (Policy SH3)) and the North Whiteley Urban Design Study and Master Planning Framework submitted with the representations in March 2012. The capacity, viability and master planning work to date support the delivery of about 3,500.
- 1.10 Given the foregoing it is important for policy to build in greater flexibility whilst highlighting the need for an early review of housing targets to reflect changed circumstances. Revised wording to SH1 could be:

A new community to the North of Whiteley consisting of about 3,500 homes (to be guided by master planning), with a target of between 30% and 40% to be affordable (ultimate affordable provision to be informed by viability), which supports....

- 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 ? and**
- 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?**

- 1.11 The allocation of North Whiteley is deliverable; the land is available, suitable and achievable and is consistent with the NPPF.

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- 1.12 A development consortium of three national house builders (Taylor Wimpey, Crest Nicholson and Bovis Homes) and the principal landowner has been formed to promote and bring forward the development at North Whiteley. This Consortium is in control of all land necessary to deliver the North Whiteley development.
- 1.13 The members of the North Whiteley Consortium bring extensive and unique expertise in delivering residential led mixed-use development, providing market and affordable housing, community creation and innovation in partnering between the public, voluntary and private sectors. It can also be noted that collectively they bring considerable financial security.
- 1.14 The intention had originally been to submit the planning application for North Whiteley ahead of the EiP, serving to demonstrate delivery of the scheme to the Inspector. In the prevailing circumstances, most notably the prolonged uncertainty with the economy and associated housing market resistance to risk, it was decided to delay submission until this large site had a formal allocation within an adopted Core Strategy. Such policy recognition would provide a level of increased certainty to justify the further commitment to the cost of submitting a planning application. Furthermore ongoing transport modeling needs to be completed prior to the submission of the application.
- 1.15 Extensive work has been taking place on the project for the last 4 to 5 years including carrying out of technical studies, stakeholder engagement, production of capacity studies, completion of character assessments, public consultation, viability review, progression of a green infrastructure framework and necessary surveys (transport, ecology etc). A more extensive list of work carried out at the site can be found at **appendix 2** of our statement to Issue 6 (Policy SH3). All of which shows the continued commitment to the submission of an early planning application. The level of work that has been completed means that with the exception of the final full assessments and collation of a planning application, everything is effectively in place to make the formal submission. This includes land control issues.
- 1.16 The North Whiteley Consortium remains committed to the North Whiteley urban extension that will serve to complete existing Whiteley in a sustainable manner. It is currently the intention to submit the master plan led outline application for North Whiteley once the Core Strategy is adopted. Acknowledging that there will be some uncertainty in this regard it is reasonable to assume that the application will be submitted during the first quarter of 2013, when there is complete policy certainty. On such a timescale, with the need to address reserved matters and carry out site preparation, housing delivery would commence in 2014. It is also envisaged at this time that multi start development will take place, to speed up initial delivery.

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

- 1.17 The allocation is in accordance with paragraph 52 of the NPPF that notes that the supply of new homes can sometimes be best achieved through planning for larger settlements or extensions to existing towns, and towns that follow the principles of Garden Cities. Through WCC's Preferred Options, extensive community consultation and technical work it has been demonstrated that the new neighborhoods at North Whiteley is the best way of delivering the completion of the existing Whiteley to create a sustainable, self-contained community, whilst delivering the level of growth needed within the PUSH area.
- 1.18 The Council's evidence base supporting the Preferred Options included robust evaluation of alternatives and concluded that the North Whiteley strategic allocation option was preferred and more sustainable than a strategy that delivered dispersed growth.

Policy SH1

- 1.19 Policy SH1 requires development at North Whiteley to provide 40% affordable housing. The Council is aware of the Consortium's position that 40% may not be achievable as evidenced by the EC Harris viability report. The Council accepts this position and it is agreed that a planning application is the correct forum to examine such detail. However, sufficient flexibility should be incorporated into Policy SH1 with regard to affordable housing to reflect the wording in Policy CP3 which states "*all development which increases the supply of housing will be expected to provide 40% of the gross number of dwellings as affordable housing, unless this would render the proposal economically unviable*" (our underlining). Without the appropriate changes in wording the policies within the plan would be in clear conflict.