

## HOUSING GENERAL - Policies CP1, WT1 and SH1

### Session / Issue 3:

#### 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. The JCS fails to demonstrate a deliverable supply of developable new housing over the plan period. The JCS sets out a housing requirement of 11,000 dwellings to be delivered over the course of the plan period. The Housing Trajectory, set out in Appendix A of *Background Paper – 1 Housing Provision, Distribution and Delivery Supplement B*, identifies that the 11,000 dwelling requirement can be accommodated from the following sources;

Source	Dwellings
West of Waterlooville Strategic Allocation	2318
North Whiteley Strategic Allocation	3000
North Winchester Strategic Allocation	2000
SHLAA sites (excluding West of Waterlooville)	2392
Windfalls	973
Total completions (2011-12)	317
<b>TOTAL</b>	<b>11000</b>

2. An alternative housing trajectory is shown in Appendix D of the Housing Background Paper which illustrates a scenario based on stronger market conditions. This shows the potential completion of 12,827 dwellings. The additional dwellings are largely accounted for by a presumed increase in windfall opportunities by 1,127 dwellings. It is also presumed that the strategic allocations will yield a greater capacity. It is worth noting that economic circumstances are expected to remain challenging for some time and therefore relying on stronger market conditions is likely to be flawed approach.
3. The scenarios illustrated in the housing trajectories fail to allow for sufficient flexibility to respond to changing market conditions and the scenario based on stronger market conditions relies too heavily on windfall developments. This lack of flexibility and reliance on a narrow range of options throws into question the deliverability of the supply of developable housing land across the District.
4. Whilst the NPPF allows Local Authorities to make an allowance for windfall sites this is on the proviso that there is *compelling* evidence that such sites have become consistently available in the local area and will provide a reliable source of supply. It is considered that no compelling evidence has been provided that windfall sites will provide a reliable source in the volumes required by the housing trajectories.

5. However, it should not be concluded that the above demonstrates that Winchester District does not have enough potential developable / deliverable housing land over the plan period; the LPA has chosen to only make provision for enough to meet its low housing target and as we demonstrate above, this relies too heavily on windfall allowances and more strategic allocations should be proposed through the plan.