

- i) *Does the Plan demonstrate that there will be a deliverable supply of developable new housing and employment land in appropriate locations over the plan period, with suitable infrastructure provision, in accordance with the NPPF/PPG and LP Part 1?*

Housing

- 1.1 Notwithstanding the fact that the evidence supporting the calculation of objectively assessed need is out of date, Bovis Homes and Heron Land Developments consider that the City Council has significantly over-estimated the current housing land supply position and consequently has failed to identify sufficient sites to meet the significant needs of Winchester Town. As such LPP2 is not sound as it is neither positively prepared, effective or consistent with national policy.
- 1.2 The Annual Monitoring Report does not distinguish between each of the spatial areas identified in Local Plan Part 1, which makes it difficult to critically test the various inputs to the calculation of the residual requirement for Winchester Town.
- 1.3 As at March 2015, only 349 dwellings had been completed in Winchester Town since 2011. This equates to just over 87 dwellings a year, woefully short of the average annual requirement of 200 dwellings. The housing trajectory included in the AMR provides a more bespoke indication of likely housing completions, however analysis of information included in AMRs since 2013 (the first year data was published on Barton Farm) demonstrates that these trajectories are far from accurate. Development rates from strategic sites such as Barton Farm are continually being reforecast as a result of delays to implementation. The 2013 AMR suggested that 320 dwellings would have been completed at Barton Farm by March 2017. This figure was reduced to 120 in the 2014 AMR and reduced again to 50 in the 2015 AMR.
- 1.4 At the end of March 2015, LPP2 suggests that there were outstanding permissions for 3,156 dwellings. Although more up to date information is currently not available, it is apparent that a number of these dwellings will not be delivered. The total includes an allowance for 307 dwellings from Silver Hill, for which the compulsory purchase order has now expired and the planning permission lapsed. It also includes 294 dwellings from the Police HQ; this planning permission has also lapsed and been replaced by a planning permission for 208 dwellings. These two sites alone account for a reduction of 391 units, more than 12% of the total figure for outstanding permissions.
- 1.5 The 3,156 figure also includes 2,000 dwellings at Barton Farm. To date reserved matters applications have only been approved for the first 425 dwellings and whilst initial highway works were completed over a year ago, construction of any residential development has yet to commence due to the failure of the relevant parties to reach agreement on land values. It is understood that the matter has been referred to the Lands Tribunal.

- 1.6 As set out in detail in the response to the publication (pre-submission) LPP2, the number of dwellings likely to come forward from SHLAA sites is also overestimated, with sites included for which there is no developer interest. A significant number of SHLAA sites have been included since work on the first SHLAA began in 2009 and are consistently rolled forward. Of the 316 units anticipated to come from SHLAA, 177 of these were identified in 2009 with implementation dates prior to 2016.

Employment Floorspace

- 1.7 There is insufficient land allocated for employment uses, particularly office development, within Winchester Town. Bovis Homes and Heron Land Developments object to the over reliance on Bushfield Camp to meet the future employment requirements of Winchester Town given the considerable uncertainty over the viability of a knowledge park on the site. The delivery of the employment allocations proposed at Station Approach are similarly uncertain given the significant issues that would need to be addressed to allow proposals to come forward.
- 1.8 The revisions to the General Permitted Development Order (GPDO) in 2013 permitting the change of use of offices to residential has had a significant impact on the availability of office space in Winchester town and will continue to do so for the foreseeable future. Since 2013, over 19,574 sq m of B1a floorspace has been lost to other uses within Winchester Town. Even assuming the 16,000 sq m of employment floorspace can be delivered at Station Approach, there would still be a net loss in employment floorspace. This reduction in available office space is not even acknowledged in the Local Plan, irrespective of the fact that there is no policy or additional allocations proposed to deal with the consequences of this change.
- 1.9 The Inspector's Report into the LPP1 noted at paragraph 44 that 'the plan's strategy that only a relatively small increase in new employment floorspace across the district will be required over the plan period relies, at least in part, on the retention of most, if not all, existing employment sites and buildings, rather than their loss to other uses.' This is clearly not the case in Winchester Town where there have been significant losses of employment sites to other uses.
- 1.10 The 2014 Annual Monitoring Report acknowledges the difficulties the City Council face in adequately monitoring the loss of employment floorspace arising from the revisions to the GPDO. This coupled with the fact that the evidence base on land for employment is now over 4 years old, suggests that the Plan is not founded on a credible and robust evidence base. A policy is required to ensure that sufficient space is allocated to address this shortfall.
- 1.11 The Plan should include a criteria based policy to allow additional employment sites to come forward on the edge of Winchester Town. This would accord with paragraph 21 of the NPPF which requires local planning authorities to include policies that are flexible enough to accommodate needs not anticipated in the plan

and to allow a rapid response to changes in economic circumstances.

Infrastructure provision

- 1.12 There is a clear need for additional land to be allocated to adequately meet the housing and employment floorspace requirements for Winchester Town. The Environment Agency and Winchester City Council have identified the requirement for a flood alleviation scheme for Headbourne Worthy. As well as accommodating the shortfall in housing and employment floorspace for Winchester Town, this flood alleviation scheme could be delivered as part of a mixed use allocation north of Wellhouse Lane.
- ii) *Is there clear evidence suitably demonstrating how and why the allocated sites were selected, including in terms of appropriate consultation with the public, representative bodies, neighbouring authorities, service providers and other interested parties?*
- 1.13 Bovis Homes and Heron Land Developments maintain that insufficient sites have been allocated to meet the housing needs of the district. There is an over reliance on a large strategic site (Barton Farm) and windfall sites to meet the housing requirement for Winchester Town set out in LPP1. Windfall sites are by their very nature, unplanned sites developed in an ad hoc manner, with little consideration for the impact on local infrastructure and services.
- 1.14 Table 4.14 of the Sustainability Appraisal purportedly contains the reasons for selecting or rejecting sites in plan making. For Winchester Town it simply states *‘the following areas have been selected for allocation where there are specific requirements that need to be set out in policy:*
- Silver Hill*
Station Approach (includes sites 2009, 2450, 2588)
Abbots Barton (includes sites 2470, 2536, 2587)
Stanmore (includes sites 2589, 2103, 2586)’
- 1.15 This clearly is far from adequate and contains no justification whatsoever for the selection of the allocated sites. Furthermore, the document continues that sites outside the settlement boundary have been rejected as they are not required within the plan period, rather than concluding on the relative sustainability merits of each of the sites.
- iii) *Does the Plan deal appropriately and sustainably with the likely development needs of the smaller villages and rural area?*
- 1.16 Bovis Homes and Heron Land Developments have no comments to make on this issue.

- iv) *Should the Plan address contingencies/alternatives, including in relation to the site allocations, in the event that development does not come forward as expected?*
- 1.17 LPP1 sets out a total housing requirement of 12,500 dwellings across the District. This equates to an average of 625 dwellings per annum throughout the Local Plan period from 2011-2031.
- 1.18 Based on the latest information contained in the Annual Monitoring Report, at 31st March 2015 net completions amounted to 1,253 dwellings. Based on an annual average development rate of 625 dwellings, 2,500 new dwellings should have been completed in this time period. The current development rate represents approximately 50% of the housing requirement to date. Even considering the City Council's bespoke housing trajectory, the number of completions is still 246 dwellings below the target of 1,499.
- 1.19 The Council argue in paragraph 6.19 of the 2015 AMR that the shortfall between the LPP1 trajectory and actual completions is a result of the national economic climate and weak housing market rather than from any lack of available sites in the District. It is of note that in the same document, the Council claim that Winchester has one of the strongest housing markets in Hampshire and housing transactions were not affected as badly as other areas (para 6.46). A recent article in the Independent (March 2016) confirmed that Winchester has had the highest house price growth of any UK city in the last 10 years with growth of 79%.
- 1.20 The 2015 AMR forecasts 4,895 dwelling completions over the five years monitoring period 2015-20, rising from 446 dwellings in 2016-16 to 1,503 dwellings in 2019-20. Whilst this level of delivery would require an increase in the rate of delivery from an average of 313 dwellings to an average of 979 dwellings for the next five years. It is highly questionable whether this can be achieved in practice.
- 1.21 Given the track record of under delivery, the LPP2 should indeed plan for the event the development does not come forward as expected. It should at the very least include a criteria based policy that allows for edge of settlement sites to come forward in the event the delivery rates are not met. The City Council should not be allowed to simply roll forward this requirement indefinitely. There should also be a commitment to begin an urgent review of the Local Plan as a whole. The suggestion that it may not begin until 2018 is unacceptable given the urgent need to deliver additional housing and employment floorspace in Winchester Town.