

**EXAMINATION OF THE WINCHESTER DISTRICT LOCAL PLAN PART 2:  
DEVELOPMENT MANAGEMENT AND SITE ALLOCATIONS**

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**EXAMINATION STATEMENT ON BEHALF OF SOUTHCOTT HOMES LIMITED (Rep 50232)**

*Matter 2 – Meeting Development Needs*

*Tuesday 12 July 2016*

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June 2016

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#### **1.0 Introduction**

- 1.1 This Examination Statement provides a response on behalf of Southcott Homes Limited, to those Questions raised by the Inspector (dated 06 June 2016), prior to the hearing session on the afternoon of Tuesday 12 July 2016, relating to the matter of whether Winchester District Council's Proposed Submission Local Plan Part 2: Development Management and Site Allocations 2015 ("LPP2") meets the development needs of the District.
- 1.2 In addition to the above, this Statement specifically highlights which areas of the Plan are considered to be unsound, and the basis upon which it fails the tests of soundness, and the changes sought.

#### **2.0 Matter 2 – Meeting Development Needs**

(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/NPPG and LPP1?*

- 2.1 In Southcott Homes' view the LPP2 fails to demonstrate that there will be a deliverable supply of developable housing land in accordance with the requirements of the Framework/NPPG and LPP1.
- 2.2 Southcott Homes' view is particularly focussed on the settlements of Bishops Waltham and New Alresford where in both cases the Council is only seeking to allocate just enough to meet the housing requirement of about 500 dwellings identified in LPP1.
- 2.3 Given the fact that the housing requirement is expressed as 'about 500 dwellings' and the national emphasis placed by Government on significantly boosting the supply of housing combined with the reliance placed by the Council on early delivery from a number of strategic development locations it is considered that the Council's approach to allocating just enough housing in these two settlements will set it on path towards failure.
- 2.4 If any one component of its supply for the two settlements were to fail or should the trajectory for the delivery of the strategic development locations slow down the Council will be unable to meet its housing requirement.
- 2.5 Furthermore the housing requirement that the LPP1 was based on was set out in the now revoked South East Plan, which was itself expressed as a minimum requirement.

- 2.6 In relation to the section of the District covered by the Partnership of Urban South Hampshire authorities (“PUSH”), which is where the majority of the Council’s proposed housing allocations are focussed, the PUSH authorities are in the process of preparing a new strategy to review the housing requirement. The new PUSH strategy that is due to be published later in the year is likely to increase the housing requirement in the authorities within the area it covers.
- 2.7 Whilst not a formal policy document the PUSH strategy will represent the most up-to-date evidence of housing need in the area and will relate to the later part of the plan period covered by the LPP1 (PUSH advise that the strategy will cover the period from 2026 i.e. overlapping with the last 5 years of the LPP1 period).
- 2.8 The NPPG advises in the Housing and Economic Land Availability Assessment section (Reference ID: 3-030-20140306) that Council’s should use housing requirement figures within up-to-date adopted Local Plans i.e. the LPP1 for assessing the rolling 5 year housing land supply. The NPPG does however go onto advise the following:

*‘Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. It should be borne in mind that evidence which dates back several years, such as that drawn from revoked regional spatial strategies, may not adequately reflect current needs.’*

- 2.9 The above advice is directly relevant to this authority, which places reliance on a housing requirement drawn from a revoked Regional Spatial Strategy (The South East Plan) that is now several years old and the PUSH authorities are in the process of preparing a new strategy, which will be published later this year providing up-to-date evidence of need.
- 2.10 The Council should therefore take the opportunity afforded by the LPP2 to allocate more land than just the bare minimum to meet the LPP1 requirement to enable the LPP2 when adopted to comprise a robust and flexible Plan that will respond to new evidence of housing need that will emerge during the early stages of the plan period. A failure to take this opportunity now may lead to a situation of planning by appeal soon after the adoption of the LPP2 due to the release of up-to-date evidence of housing need.
- 2.11 The approach advocated by Southcott Homes would also be consistent with Paragraph 158 of the Framework as set out in Southcott Homes’ representations to the pre-submission draft in December 2015.
- 2.12 Southcott Homes has provided separate evidence in relation to Matters 6 and 9 regarding the opportunities that exist within Bishops Waltham and New Alresford for the LPP2 to allocate further land to provide a flexible and robust delivery strategy, which is not therefore repeated here.

(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?*

2.13 For the reasons that Southcott Homes has set out in its representations to the pre-submission draft in December 2015 the Council's evidence base clearly indicates that:

- In the case of Bishops Waltham land at Albany Farm attracted the most positive comments from the local community and is one of the least constrained locations for accommodating growth. Development of the site has also been thoroughly tested via the recent determination of an outline planning application. The Council has however ignored this evidence and effectively underutilised the potential of the site by only allocating it for about 120 dwellings instead of its true capacity of up to 200 dwellings. This is a fact recognised by Members in their determination of Southcott Homes' recent outline planning application on the site; and,
- In the case of New Alresford the Council has ignored the overwhelming evidence that the local community does not support its single strand strategy to such an extent that a separate Alternative Professionals Group ("APG") has been formed who has prepared an alternative plan for the settlement.

2.14 The above matters are explored in further detail in Southcott Homes' separate statements for Matters 6 and 9.

(iii) *Does the Plan deal appropriately and sustainably with the likely development needs of the smaller villages and rural area?*

2.15 Southcott Homes does not have any further points to make in relation to this particular question.

(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?*

2.16 In short yes the Plan should address the eventuality that development does not come forward as expected. This is a basic requirement of ensuring that the Plan is positively prepared.

2.17 Given the background to the preparation of the LPP2 and the historic context of the LPP1 housing requirement it is considered vital that the Council takes the opportunity to allocate additional land in sustainable locations to provide a robust and flexible delivery strategy and avoid the risk of planning by appeal in the early years following the adoption of the LPP2.

2.18 In particular relation to Bishops Waltham and New Alresford there is clear evidence within the supporting documents that accompanied the pre-submission consultation and indeed the submission version of the LPP2 (including the Sustainability Appraisal ("SA")) to demonstrate that opportunities exist for further land allocations to ensure that the supply of new housing and, affordable housing, is maintained throughout the plan period.

2.19 In the case of Bishops Waltham land at Albany Farm represents a prime opportunity for the delivery of further housing (beyond that currently proposed in the draft allocation for the site) in a sustainable location that accords with the key principles in the Framework and would provide for flexibility in the event that any of the other proposed allocations fail to perform as expected by the Council.

- 2.20 With regard to New Alesford land at New Farm Road provides an opportunity for the allocation of land to provide a 'float' of housing to ensure that should there be either failure or slippage in the delivery of the proposed Sun Lane and The Dean allocations, which will be complex to bring forward, that a supply of housing can continue in order to meet the needs of the community in the shorter term.
- 2.21 In both of the above cases the allocation of the land would be consistent with the principles and policies set out in the Framework, including the presumption in favour of sustainable development (Paragraph 151 of the Framework).
- 2.22 The Council's current approach that barely meets the requirement for these two settlements as set out in the LPP1, which is itself based on a constrained requirement from the revoked South East Plan, does not in Southcott Homes' view represent positive and effective plan making that would be consistent with the Framework.
- 2.23 The Council has progressed with its allocation strategy for each settlement without having full and proper regard to its own evidence base that includes a more up-to-date SHMA than was used for the South East Plan, the findings of its SA and, detailed representations provided by the development industry and other key stakeholders.
- 2.24 Opportunities have been missed by the Council, which if carried through the Examination process could result in a fragile Plan that would be unable to respond to changing circumstances either in relation to the delivery of any of its allocations, or the strategic development locations, or changes to the evidence base in relation to need.
- 2.25 In Southcott Homes view further allocations of land are therefore essential to ensure that the LPP2 can properly plan for the period to which it relates in a justified and positive manner that would accord with the Framework, the NPPG and, most importantly the Government's overarching presumption in favour of sustainable development in order to significant boost the supply of new housing nationally.

### 3.0 Changes Sought

- 3.1 In order for the Plan to be sound it is essential that the Council recognises the importance of providing flexibility in the allocation of land within the LPP2. Further land allocations should therefore be made particularly within the two settlements of Bishops Waltham and New Alesford where opportunities already exist.
- 3.2 A failure to properly plan for the eventuality that the current LPP2 fails to deliver development as expected will result in a document that has clearly not been prepared positively in accordance with the requirements of the Framework and in recognition of the evidence base that is available to the Council.

3.3 Southcott Homes has provided further detail on those locations that it would commend to the Inspector as being suitable and sustainable locations for the allocation of further housing within its statements on Matters 6 and 9, which are not therefore repeated here.

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