
Winchester District Local Plan Part 2 Examination Statement on behalf of Crown Golf

Matter 2: Meeting Development Needs

Land at Wickham Park Golf Club, Wickham

Representation Reference 51965

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1. Introduction

- 1.1 This Hearing Statement has been prepared by Savills on behalf of Crown Golf in response to the Inspectors questions concerning Matter 2: Meeting Development Needs.
- 1.2 This statement should be read alongside:
- the representations by Savills on behalf of Crown Golf to the Publication (Pre-Submission) Local Plan Part 2 Consultation in December 2015. These earlier representations were supported by Location and Concept drawings by Savills Urban Design Team and a Highway Technical Note (Access Appraisal) produced by SK Transport Planning; and
 - the separate Hearing Statement submitted on behalf of Crown Golf in response to Matter 12 'Wickham'.
- 1.3 This statement provides evidence in respect of the Soundness of the Plan as submitted for Examination and focuses specifically on questions i, iii and iv.

2. Question 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?

- 2.1. The Council continue to contend in their Background Paper 1 – Housing Requirements and Supply Paper ('Housing Paper' March 2016) that the housing requirement is for 12,500 dwellings over the 20 year plan period, not for an annual delivery average of 625 dwellings a year. Based on this, it follows that the Council's five year supply should also be judged on their trajectory contained within the LPP1. This shows that against the low projections at the start of the plan period there is already a shortfall of -246 units from 2011 to 2015 (LPP1 Trajectory).
- 2.2. Using the Council's methodology, this shortfall is only likely to increase as the Council's trajectory proposes higher annual completion rates moving forward. There are 3 strategic sites which form a predominant percentage of the Council's proposed housing supply, one of which, North Whitley, is currently programmed to deliver 950 dwellings by March 2020 alone. This is considered to be a significant overestimation based on typical build out rates, and given Reserved Matters are still to be approved.
- 2.3. Furthermore, the delivery rate and the capacity of the sites can also be impacted by a variety of unpredictable and uncertain factors, including implementation and economic constraints. As examples, the discovery of a previously unknown environmental constraint, lack of construction materials or labour; or a slowdown in the housing market all of which can have negative impacts on the rate of houses being built and occupied. Where there is a slow down in the delivery of a certain site or sites, this will ultimately have further negative impact on housing supply.
- 2.4. On the basis of the Council's trajectory alone, the existing shortfall is only going to worsen over the next 5 years and there is a clear need to allocate contingency sites. This is discussed further under question iv of this statement.

3. Question iii

Does the plan deal appropriately and sustainably with the likely development needs of the smaller villages and rural areas?

- 3.1. Our previous representations set out that housing numbers within the Winchester's LPP1 should not be seen as a 'ceiling' to development and that the plan should seek to 'boost significantly' the supply of housing in sustainable locations in accordance with the National Planning Policy Framework. Wickham is a sustainable location where development would help to enhance and maintain the vitality of the village and where there is the potential to support additional housing growth which would meet housing need.
- 3.2. Sustainable settlements such as Wickham also have the potential to deliver contingency sites in the event that there is an under delivery of housing. In order to be considered sound the plan should include contingency sites and this is addressed further in question iv below.

4. 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?

- 4.1. A key priority of the new plan must be to ensure the delivery of sufficient housing sites to meet the needs of the district as identified in the evidence supporting the Local Plan. However there is in fact an increasing shortfall when judged against the housing need of the LPP1, this along with the low completions projected in the coming years and even with delivery of the LPP2 sites, will require additional sites in the short term.
- 4.2. To ensure that the local plan is positively prepared it should plan for allocated sites not coming forward as anticipated (as set out our response to question i of this statement) by allocating a number of contingency sites across the District. At the current time no contingency sites have been allocated and on this basis the plan is not considered to be positively prepared.
- 4.3. The benefit of contingency sites is that they have been planned through the plan making process, with an element of public consultation and scrutiny; thus there is a greater chance that they would be deliverable in comparison to relying on the potential for windfall development to come forward. They also allow for housing delivery to be managed throughout the plan period.
- 4.4. The inclusion of a number of contingency sites within the District, in sustainable locations, would ensure deliverability of the plan. Contingency sites should therefore be incorporated to ensure that the plan is robust and sound. Housing figures are not treated as a ceiling within LPP1 and Policy CP1 is flexibility worded to allow the delivery of 12,500 dwellings to be exceeded as is Policy MTRA which requires the provision of 'about 250 new homes' in Wickham.

- 4.5. With specific regard to Wickham, the Pre-Submission Local Plan Part 2 (LPP2) Section 4.8 “Wickham” proposes in total to make provision for approx. 259 dwellings. This provision relies on the proposed allocated sites at Winchester Road and The Glebe delivering 205 dwellings in total despite the specific policies (WK2 and WK3) stating that they will provide “about 125 dwellings” and “about 80 dwellings” respectively. The lack of conviction in the wording of the policies suggests there is a level of uncertainty as to the exact numbers of dwellings that these sites will be able to deliver given their constraints and a minimum figure has not been identified. It is noted that the planning application that has been submitted for site WK2 Winchester Road is for 100 dwellings (25 dwellings short of the proposed allocation). A separate application for 25 dwellings has been submitted on land outside of the settlement boundary proposed within the Publication Local Plan. This is therefore indicative of potential capacity issues on the site and demonstrates the need to allocate contingency sites within Wickham to positively plan for where housing should be delivered in the event that it does not come forward as anticipated on allocated sites.
- 4.6. Furthermore, the plan relies on all 49 dwellings that have already been granted approval since 31.01.2015 in Wickham being delivered to which there is no certainty.
- 4.7. Wickham is a highly sustainable settlement where additional housing development can be accommodated to meet the housing need and to provide contingency development should other sites not be delivered as anticipated in Wickham. Our accompanying Hearing Statement on Matter 12 ‘Wickham’ identifies Land at Wickham Park Golf Club as being suitable, available and achievable to provide a contingency site for at least 70 units in Wickham to meet this need.

5. Summary

- 5.1. While the Council places significant weight on judging its performance against the LPP1 Trajectory, it does not use the LPP1 trajectory to quantify the amount of housing required to satisfy the requirements of the NPPF. On the basis of the Council's trajectory, the existing shortfall is only going to increase and there is a clear need for contingency sites.
- 5.2. Furthermore, in Wickham the plan works on the assumption that all allocated / granted planning permissions for housing will be delivered at all full indicative capacity in order to meet the 'about 250 new homes' requirement. This is unrealistic and does not plan positively for growth. To ensure that the plan is sound and meets the needs of the District across the plan period, it must identify and allocate sustainable contingency sites.

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