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# Local Plan Part 2: Examination

## Further Written Representation

### Matter 2: Meeting Development Needs

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Savills on behalf of Alfred Homes (51580)

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# 1. Introduction

- 1.1. This submission of further written representation addresses the questions raised by the Inspector in respect of Matter 2, drawing on the Council's evidence base and assessing the position against the tests of soundness, principally, whether the Plan has been positively prepared and justified.

## 2. 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 As contained within Housing Background Paper (March 2016, OD15), and indeed the recently published 2015 Annual Monitoring Report, the City Council dismisses the assertion by some objectors that the performance of the Council should be judged against an annual average delivery rate of 625 dwellings.
- 2.2 In this context, the Council contends that the findings of the LPP1, namely the delivery of 12,500 new homes during the Plan Period based upon the trajectory contained within, satisfies the need to 'boost significantly the supply of housing' (see Paragraph 5.2 of OD15).
- 2.3 As per Paragraph 47 of the NPPF, all Local Planning Authorities in England are to be judged on their ability to maintain a rolling supply of deliverable sites, the equivalent to 5 years worth, in addition to a minimum of 5%. If therefore the City Council advocates its performance should not be judged on an annual average of 625 dwellings, then it follows that its performance must be judged on the trajectory as contained within the LPP1; the same trajectory the City Council advocates demonstrates it is significantly boosting the supply of housing.
- 2.4 While the completions projected at the start of the Plan Period since 2011 have been low, and indeed, have been used as the benchmark by WCC in judging past performance, the projected completions (and thus the ability to meet 12,500 dwellings during the course of the Plan Period), are rising as we move towards the middle years of the Plan Period.
- 2.5 While even against these low levels of projected completions at the start of the Plan Period, the Council has still experienced a shortfall of -246 units from 2011 to 2015 [LPP1 Trajectory 1499 – Completions 1,253], when compared to the LPP1 trajectory.
- 2.6 This position will soon be exacerbated due to the rising of the annual completions within the LPP1 Trajectory, against which WCC argues it should be judged. While the Council contends it has only a modest shortfall during the first 4 years of the Plan Period (Para 5.27 OD15) when compared to the LPP1 trajectory, and in turn argues it is a 5% authority, the methodology it has sought to be judged against will shortly mean expected completions will move well above the annual average in order to make up for the low level of projected completions at the start of the Plan Period, and to enable the delivery of 12,500 dwellings during the Plan Period.
- 2.7 In short, what has been helpful to the Council at the start of the Plan Period and a judgement of performance against the LPP1 housing trajectory is soon to shift, requiring significant levels of housing

completions during the middle years of the Plan Period; a position it advocated was achievable during the LPP1 Examination. If it had chosen to be judged on an annual average, as is the case with many Local Authorities, then this fluctuation would not occur, albeit, the Council would now legitimately be regarded as a 20% Authority as the shortfall would equate to -1,247 up to 2015 [ $625 \times 4 = 2,500 - 1,253$  completions], with a significant deficit in completions every year since the start of the Plan Period.

- 2.8 In light of the Council's advocacy that it is the LPP1 trajectory and the need to deliver 12,500 during the Plan Period that carries more weight than an annual average, it is of particular concern that the Council itself switches to the use of an 'annual average' to seek to argue that it has a 5 year land supply.
- 2.9 Unlike past performance, against which the Council uses the LPP1 trajectory to judge performance, looking forward to future performance, the Council adopts a simplistic Liverpool Methodology (not favoured by the PPG), to create an annual average, which it then multiplies by 5. In practice and numerical terms, this equates to deducting the completions to date [1,253] from the total requirement [12,500], and then dividing by the remaining years of the Plan Period [16], to create an 'annual average' of 703 dpa, which is then multiplied by the five years [ $703 \times 5 = 3,515$ ].
- 2.10 This methodology is also at odds with the PPG, which advocates that any shortfall should be made up for where possible in the next 5 years, but more importantly, also ignores entirely the methodology against which the Council gives most weight, and to which it advocates its past performance should be judged, namely the LPP1 trajectory.
- 2.11 For comparison and excluding any shortfall that has occurred to date (whether measured against an annual average or the trajectory), the LPP1 trajectory projects completions of 5,049 dwellings over next 5 year period (2015 - 2020), some 1,534 dwellings more than that stated by the Council is required when it utilises an annual average in combination with the Liverpool Method. The Council's stated position includes the shortfall, but this is averaged out to be delivered over the remainder of the 16 years of the Plan Period, and therefore only a proportion of the shortfall is made up. If, as per the favoured approach in the PPG, the shortfall was made up for in the first 5 years, then the 5 year requirement would increase by 246 units to 5,295, or 1,059 dwellings per annum (excluding any buffer). This calculation simply uses the LPP1 trajectory to calculate the past performance and future requirement and therefore remains consistent throughout the calculation.
- 2.12 Should the calculation only use an annual average to judge past and future performance, then the 5 year requirement remains largely the same (circa 1000 dwellings per annum), due to a higher level of shortfall needing to be made up by 2020 and thus a 20% buffer being applicable, in combination with a lower requirement over the next 5 years when not based on the trajectory.
- 2.12 The 'hybrid' approach adopted by the Council is not known to be used by any other Local Planning Authority, and creates a distorted position insofar as attempting to show low levels of shortfall, and thus a 5% buffer being applicable, and equally, lower levels of requirement during the next 5 years, given the residual quantum is averaged over 16 years and ignores the higher levels of completions projected in the middle years of the Plan Period.

- 2.13 It is noted within Appendix 2 of the Housing Background Paper, that the Council presents an alternative trajectory to that contained within the LPP1. While this raises questions over the validity of unilaterally amending a trajectory deemed appropriate in the context of significantly boosting the supply of housing (as advocated by the Council), importantly it shows that even with the LPP2 in place and its projected supply coming forward, the Council itself is not expecting to meet the LPP1 trajectory in any year until 2018/ 2019, by which time the shortfall will have increased significantly.
- 2.14 In respect of supply, while the LPP1 strategic sites are not to be debated in the context of the Local Plan Part 2, the failure of both Barton Farm and North Whiteley to deliver completions is relevant in the context of needing to maintain a rolling supply of deliverable sites. While both benefit from Planning Permission, the City Council has in our view overestimated the projected supply from both sites in the next 5 years, particularly North Whiteley, where from a standing start and no Reserved Matters approved, it expects 950 dwellings completed by 2020.
- 2.15 To put this into context in the consideration of Matter 2, the average sales rate per outlet on a strategic site is circa 40 to 45 dwellings per annum (source - 9 leading National Housebuilder annual reports), plus affordable housing, of which North Whiteley is delivering 15% on site. As such, even following the submission of the Reserved Matters, the approval of the Reserved Matters, the with the commencement on site by the three developers simultaneously, there is no possibility of 950 dwellings being completed by March 2020 based on all empirical evidence.
- 2.16 In summary, and in judging whether the Council can demonstrate the deliverable supply of developable new housing in accordance with the NPPF, PPG and LPP1, we would highlight and stress the inconsistent approach WCC adopts in giving weight to the LPP1 trajectory to judge past performance, but the dismissal of that trajectory when seeking to quantify the five year requirement, instead switching to the one method it advocates should not be used – an annual average.
- 2.17 The Government, via the provisions of the NPPF and the PPG, have set a national framework that seeks to boost significantly the supply of housing, and where a shortfall has occurred, that this should be made up for as soon as possible. The Council has continually advocated that meeting its LPP1 housing trajectory would demonstrate that it would be 'significantly boosting the supply of housing', and therefore against that barometer, it is evident the Council is failing, and more importantly, the resulting shortfall is going to increase.
- 2.18 To provide clarity, the Council should provide the Examination with an assessment of both past and future performance based on standard methodology, either solely based on an annual average approach (at 625 pa) in combination with the Sedgfield methodology as favoured by the PPG, or solely based on the LPP1 trajectory to judge both past and future performance.
- 2.19 In our view, and based on a more robust assessment of supply delivering 3,733 dwellings to 2020, inclusive of the supply from the LPP2 sites, the Council would not be able to meet the tests of Para 47 under either scenario.

END

3. 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?

- 3.1 The Council has throughout the production of the Spatial Strategy for New Alresford commended its approach of forming an evidence base via a series of Needs Groups and the Town Council.
- 3.2 It is of concern therefore that as set out within the Cabinet Paper of October 2015 (WCC4), the Council dismisses the findings of the Employment Needs Group addendum paper, prepared as a result of a population projection error on behalf of the City Council.
- 3.3 The principal conclusions from the Needs Group focused on the extent of home working and existing floorspace within the Town, of which there are currently vacant premises. The addendum concluded in stating that *'in light of the corrected population forecasts and taking into account present and emerging trends in types of employment (especially home working), it is not necessary to allocate land for new (Greenfield) commercial or business sites in Alresford'*. (EBNA13).
- 3.4 To quote the Chairman of the Needs Group in his covering letter of addendum *'A great deal of work has gone into the Addendum in a short period of time, and I believe it is an accurate document of great use.'* It is of concern therefore that within Paragraphs 21 and 22 of the Cabinet Report, the City Council is dismissive of the outputs of the Needs Group Addendum, particularly given the Council has to a large extent sought to justify its spatial strategy on the outputs from this local knowledge and advice. To suggest, as the Cabinet Paper does, that the reconvened Needs Group was in some way biased in reaching its conclusions is of particular concern, and should be treated with caution.
- 3.5 Further commentary regarding the site selection process for New Alresford is set out within Matter 9.

#### 4. 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 As shown within Section 2 of this Statement, the methodology used by the City Council to calculate its 5 year land supply position, to be judged against the tests contained within Paragraph 47 of the NPPF, is not considered either robust or consistent throughout. Moreover, the Council itself within Appendix 2 of the Housing Background Paper highlights the ongoing failure to meet that prescribed within the LPP1 trajectory in the coming years, exacerbating the shortfall that has already occurred since 2011.
- 4.2 In the context of an increasing shortfall when judged against the housing need of the LPP1, coupled with projected low completions in the coming years, even with delivery of the LPP2 sites, it is considered crucial that the LPP2 is modified to identify additional sites to come forward in the short term.
- 4.3 As the Inspector will be aware, LPP1 Policy CP1 does not treat the delivery of 12,500 dwellings as a ceiling, but is worded flexibly to allow for this housing level to be exceeded. Indeed, this flexibility is also reflected within Policy MTRA2, and the provision of 'about 500 new homes' to be delivered at New Alresford.
- 4.4 There is therefore ample scope within the wording and strategy contained within the LPP1 to allow the Inspector to identify additional sites, but also equally, sufficient failure of the LPP2 to fully justify the inclusion of sites within the submitted LPP2. In our view, given the existing and projected shortfall that will occur, those additional sites could legitimately be 'baseline' allocations, to come forward unrestricted and aid to make up for the shortfall that is occurring, or as contingency sites, albeit we feel the tests to when the latter would be triggered has already passed.
- 4.5 As per Savills submission concerning New Alresford (Matter 9), site reference 2552 (land adjacent to Alrebury Park) is available, suitable and achievable, to deliver 60 residential dwellings and an extension to the existing public car park, the latter reflecting the objectives of Policy NA1. The land is unconstrained, and forms part of the Alternative Plan prepared by the Local Community for New Alresford to meet the requirements of MTRA2, which was reflected in the level of support gained (68%) for the delivery of the site as part of the public consultation held in December 2015.
- 4.6 Further commentary concerning the site is set out within Savills Pre-Submission representations to Policies NA2, NA3 and the SA.

END



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