

To:

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**From: Adam & Bernadette Welch
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Subject:

LPP2 EiP Update

21st June 2016 by 5 pm (3 paper copies + email)

Respondents:

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Introduction

This submission outlines the updated concerns of the Welch family with regard to the Councils LPP2 documents with specific reference to policies ;

WIN1 – Winchester Town

WT1 – CP3 allocations in and adjoining Winchester Town for 4,000

WIN 8 - Stanmore

DM5 – Open Space provision for New development

CP3 – housing development with 40% affordable

1. Policy WIN 1 – Winchester Town

Not Positively Prepared.

Not Pro-active.

Does not boost delivery.

This submission outlines the concerns of the Welch family with the Councils LPP2 documents, and the performance of the Council to date in delivering housing completions including affordable completions as set out in its LPP1 trajectory appendix F and its failure to provide an updated appendix as part of its LPP2 documentation.

The inspectors report on LPP1 required the Council to increase its supply of housing from 11,000 in Appendix C to 12,500 in Appendix F. In paragraph 49 the inspector stated:

based on the Council's affordable housing requirement figures (EB124) (2012) a total of 11,000 new homes would not provide appropriately for objectively assessed local needs.

Paragraph 57 stated:

Importantly, it should enable an annual affordable housing delivery rate of around 250 units to be achieved. It would also take into account the 100 or so new units per year that the Council presently intends to help deliver using its own resources.

Paragraph 58 stated:

All of the above should be sufficient to meet local affordable housing needs within the first 10 years or so of the full plan period, given the scale of existing and projected demand as well as the current backlog.

The absence of a trajectory in the Councils LPP2 documents avoids scrutiny of its performance to date and the credibility of its future projections. The back ground

papers do not identify the new affordable need going forward or from the last reference, making the “need” requirement not robust.

The Authorities completions and projections in its 2015 AMR do not withstand scrutiny for the following reasons.

- (i) The appendix F predictions do not show windfall completions for the first 5 years (the first year 317 completions were known to include windfalls). Whereas the 2015 AMR includes windfalls. The inspector should require the Authority to provide its windfall figures to date. This information will demonstrate that Appendix F grossly over estimated the number of planned completions in the first 4 years, and the Authority has not met its appendix F targets.
- (ii) The Appendix F figures do not include exceptions sites completions. The 2015 AMR does. Policy CP4 of the Local Plan Part 1 states that exceptions sites are *in addition to the general housing provision in CP1*. There have been 98 exceptions sites completions in the first 4 years of the Plan. Of the 370 affordable completions, with 98 exceptions – only 272 were planned completions.
- (iii) Appendix F shows 1499 completions in the first four years. The 2015 AMR shows 1253 completions – 16% less than predicted even if exceptions and windfalls are counted. The CP3 objective of providing 40% affordable is dependent on planned completions. Windfalls will not provide 40%. The return of the 10 dwelling threshold will ensure that this is the case.

It is essential that the Authority is required to disclose its planned completions, windfall and exceptions completions to inform scrutiny of its future projections.

A comparison of the Councils appendix F projections and the 2015 AMR projections reveals that the AMR has increased projected supply:

In year 2018/19 by 237 (21%): in year 2019/20 by 461(44%): and year 2020/21 by 334 (24%). These increases lack credibility and are designed to comply with the inspectors paragraph 58 objective. There is no justification to increase the projected supply. The AMR projected supply are at best misleading and un-deliverable and certainly not robust or effective.

A further reduction in the supply of affordable housing has occurred in the North Whiteley Urban Extension- where the Council has agreed to reduce the affordable provision from 40% of 3,500 (1400) to 25% (875) with on-site provision of 525 dwellings and an offsite contribution of £17.5m (for 350 dwellings (875 - 525)). Thus the offsite contribution of £17.5m equates to 50k per lost affordable unit.

Thus the allocated site is only providing 15% affordable housing on site – which begs the question- should the site have been allocated as it was so far adrift of the CP3 target of 40% affordable. The 15% loss of affordable dwellings equates to 525 dwellings or £26.25 m at £50k per lost affordable unit. Seeing the limited number of MDA's allocated in the Plan, such a material change undermines the effectiveness of the Local Plan. If £17.5m is an accurate figure for 350 affordable dwellings – why are they not provided on site.

The council has introduced a requirement to make viability assessments public planning documents but they have not made the North Whiteley assessments public. The inspector should require disclosure to ensure that the reduction is sound.

The Councils negotiations with the developer have shortened the delivery period from 12 to 8 years – from an average of 291dpa to 437dpa. This suggests that the Council extracted this shorter delivery period in return for the reduction in affordable provision. An increase of 50% more dwelling per annum is not credible. This negotiation has potentially lost the Council £26.25 million pounds towards affordable housing and it is only robust to ensure the viability supports such a loss to the public purse.

The return of the 10 dwelling threshold will impact on the supply of affordable housing in Winchester. In January 2015 (when the 10 dwelling threshold was initially in place) the report to cabinet- paragraph 3.1 confirmed that:

there are in excess of 2,000 applicants on the Councils waiting list who have been assessed as being in high or urgent housing need.

In paragraph 4.3 it stated that: *there is no planning policy requirement to identify more land for housing, whether affordable or market.*

We suggest that this assertion is incorrect and that the Council should not include windfall completions for *about* 4,000 housing supply in Winchester but allocate additional sites and allow windfalls to increase the supply given that 4,000 is not a capped figure.

2. Policy WT1 – CP3 allocations in and adjoining Winchester Town

Not Positively Prepared.

Not Pro-active.

Does not boost delivery.

The LPP2 has completely missed the search for sustainable development land *adjacent* to Winchester Town, even though there are sites available in the SHLAA and application have been made. This is neither positively prepared nor pro-active. See the Welch Harestock Road application 14/02848/OUT which included a significant open space proposal much larger than the CP7 requirement in an area where there is a significant shortfall. A more recent application 16/01188/OUT on the same site has increase the public open space offering by 89% to 3.2 ha over that required by CP7.

We respectfully request that this land be allocated at EiP, as part of a CP3 allocation to boost the supply of sustainable housing land, adjacent to Winchester Town (WT1 compliant) that offers the opportunity to help address identified open space shortages in a deprived area (JCS1 compliant).

We have provided a Development Framework for 45 dwellings, illustrating app 16/01188/OUT in Appendix A, with drawing reference HR_EIP_01.

We have provided an update to Map 24 Winchester North and Littleton, to illustrate how this proposal could affect the map, in Appendix B.

The Inspector made a clear distinction between the methodologies for the search for development land between MTRA and WT1. The Council has ignored the direction to search adjacent to Winchester Town and has lost very sustainable sites. This inaction makes the plan neither positively prepared, robust, nor pro-active. This is in direct conflict with JCS1 and therefore the Plan is unsound.

3. Policy WIN 8 - Stanmore

Not Positively Prepared.

Not Pro-active.

Stanmore framework likely to worsen open space shortfall by 111%

The Stanmore planning framework in St Luke's ward promotes development of around 150 units. The existing open space in the area is included in the framework (and owned by WCC) and given the existing densities and urban layout, it is likely that most, if not all the new development will be accommodated on the existing Open Space.

CP7 Open Space Type	St Luke's Adequacy from OSS Sept 2015 In hectares
Allotments	0.79
Equipped Children Play	-2.11
Informal Green Space	5.80
Natural Green Space	-5.31
Parks & Recreational Grounds	0.63
Sports Ground	-3.98
Total	-4.18 ha

The Stanmore area has already a significant overall shortfall in Open Space as measured against the CP7 standards (-4.18 ha) . The Stanmore area has a high development density and it is unlikely that the new development will consist of knock down redevelopment, given the densities, land prices and build costs. The inclusion of existing CP7 Open Space land within the framework indicates the Council's intention to develop on their own Open Space land (against Policy which protects existing open space). The likely affect will be to increase the existing open space shortfall by 111% to -8.82 ha.

Local need includes the need for open space and plan makers need to consider the existing shortfall of open space and not plan to make it worse.

There seem to be a conflict of interest between the Council who owns the Open Space land and its planning framework that promotes its development.

The WIN 8 policy is not positive planning or effective in improving the environment and will most likely increase the open space shortfall by 111%, in an already highly dense urban area.

4. Policy DM5 – Open Space provision for New development

Not Positively Prepared.

Not Pro-active.

Does not boost delivery.

The DM5 policy completely missing the planning of Open Space for “existing” development. The OSS SEPT 2015 identifies the existing open space provision, although there are context and numerical errors (see my previous OSS objection for details) but fails completely to even attempt to address the shortfalls.

Winchester Town is particularly poor in regard to “existing” provision. The Council planners keep saying “On the whole there is a surplus of Open Space” but this hides the truth that 66% of Winchester Wards (including Badger Farm, Harestock and Oliver’s Battery) have shortfalls in Open Space when compared to the CP7 requirement. A statistic of 66% of Wards in shortfall is not a success, and the DM5 does not attempt to address this situation.

The JCS1 was clear that all “needs” need to be addressed in a plan led manner, and to ignore the problem when the OSS identifies it, is neither robust or good planning. This position gets worse when the Council has been given the opportunity to improve an area in shortfall and ignores it. (See Harestock Road application 14/02848/OUT where a significant 2 ha over the CP7 requirement where offered).

The St Barnabas Ward in Winchester has had its boundary re-drawn by the Boundary Commission Review and now includes Harestock and the land adjacent to Harestock Road (which includes the proposed development area of app 14/02848/OUT). Using the OSS Sept 2015, the recorded adequacy in hectares for Harestock was -6.38 and the adequacy for St Barnabas (before the Boundary Commission change) was -20.75 therefore the new shortfall of Open Space for the new St Barnabas Ward, which has a population of 8,580 is at least -27.13 ha. The new St Barnabas Ward is nearly twice the size of the Barton Farm MDA.

The “Needs and Opportunities” text for Harestock says:

“Harestock, taken in isolation as a suburb of Winchester, lacks sufficient public open space when assessed in accordance with the standard in LPP1 Policy CP7. There are shortfalls in all categories except sports grounds. However, there are opportunities to expand the provision of public open space available to the area as part of the Barton Farm major development area becomes available. Some 23 hectares of open space will become accessibel to this north west part of the town.”

However, it fails to provide context to the 23 ha of open space in Barton farm, as the new population there will need over 18 ha, therefore the surplus is only 5 ha. The Council has been informed of these misleading statements on a number of occasions via objections but has chosen to keep this misleading text.

The need is here and now, yet the planners rely on the delivery of a MDA at Barton Farm which is likely to take 10 years and will only provide a surplus of 5 ha, where the need today is 27.13 ha.

The Welch family has recently re-submitted an application on our land in Harestock road, reducing the development footprint, bringing the development behind the first tree line, to mitigate the Local gap concerns. The application is 16/01188/OUT. This application has increased the proposed public open space by +89% to 3.2 ha, over that required by CP7 in an area where there is an identified existing shortfall of -27.13 ha. The application also includes a barn for conversion to public use.

We respectfully request that this land be allocated at EiP, as part of a CP3 allocation to boost the supply of sustainable housing land, adjacent to Winchester Town (WT1 compliant) that offers the opportunity to help address identified open space shortages in a deprived area (JCS1 compliant).

We have provided a Development Framework for 45 dwellings, illustrating app 16/01188/OUT in Appendix A, with drawing reference HR_EIP_01.

We have provided an update to Map 24 Winchester North and Littleton, to illustrate how this proposal could affect the map, in Appendix B.

5. Policy CP3 – housing development with 40% affordable

Not Positively Prepared.

Not Pro-active.

Does not boost delivery.

Winchester Town being the most sustainable city in the district, is the best location for delivering sustainable development, if the Inspector is convinced there is a delivery problem in the district in the short or long term. We would argue a compelling list of reasons to hold this view, would include ;

- a) North Whiteley will only achieve 525 affordable homes, when the target was 1400 homes. Where can this shortfall of 875 affordable be made up, as MDA's have already been allocated.
- b) To make up the 875 affordable lost at North Whiteley a number of CP3 40% compliant allocations of in total 2,187 homes would be required. That's if there are no viability issues that may reduce the affordable element.
- c) The Council will receive £ 17.5 m for offsite affordable, sometime in the future in regard to North Whiteley, but there is no land allocated to use this money on.
- d) Winchester Town did not have a complete search for sustainable sites as part of LPP2, as the WT1 policy to search *adjacent* to Winchester Town was not implemented. There are available sites adjacent to Winchester Town which can provide quick delivery of CP3 schemes on green field, that are cheaper and quicker to delivery, as their infrastructure costs are less.
- e) Silver Hill will not be delivered in the short to medium term. It has already taken a little over 20 years to get, back to the drawing board.
- f) Viability issues on Barton Farm may reduce the number of affordable homes delivered in the future and potentially the Social rented element.
- g) The North Whiteley MDA and it's dpa figures have been frigged from 291 dpa to 437 dpa by reducing the delivery period from 12 to 8 years. This is simply impossible and impractical on a commercial basis. This creates a hidden delivery problem that will need addressing.
- h) We have seen the negotiations at North Whiteley not only reduce the number of on-site affordable but also switch the social rented element from 70% to 30%. This increases the need for rented affordable housing that only more allocations on green field sites has the potential to address.
- i) Winchester Town is too heavily reliant on Windfall sites. As the boundary of Winchester has not moved (other than for new MDA's) the historic windfall rates become more unreliable as time goes on. The quantum of land within the boundary is finite.
- j) The recent change to 10 dwelling rule for affordable contributions will greatly reduce the affordable provision in Winchester Town and larger villages.

- k) The delivery of affordable in Winchester Town has been consistently under-performed the 100 per year target, with very little prospect to increase.
- l) In order the boost supply or even get the delivery on target of Appendix F trajectory, a number of green field allocations are required. Both small and large allocations are required, but smaller allocations would deliver quicker.
- m) Having spoken to Andrew Palmer today (WCC New Homes Delivery) the number of affordable delivered were;
 - 2012/13 about 50
 - 2013/14 about 50
 - 2014/15 118
 - 2015/16 60

This gives a total for affordable delivered in the last four years of around 278 which is 69.5 pa whereas the LP1 expectation was 100 per year. So that's a shortfall of 122 (400-278) in the last four years, representing a 30.5% under performance. Mr Palmer said currently there is a district wide affordable need of 2,333 homes with the vast majority (80-90%) wanting to live in Winchester, as it is an employment hub, and monthly there is a net increase in affordable need.

In order to attempt to gain control of the affordable delivery problem, there is creditable evidence to suggest new allocations are required where the need is – which is Winchester Town.

Given the above, there are a number of compelling reasons that a number of small and larger allocations in Winchester Town, on green fields are required to ensure delivery to the Appendix F trajectory.

APPENDIX A

Development Framework for about 45 dwellings on land
Adjacent to the Down House, Harestock Road, Winchester

Blank

APPENDIX B

Proposed Allocation Mark up to

Winchester City Council Policies Map
Map 24 Winchester North and Littleton