

**Representations to  
Winchester City Council's  
District Local Plan 2020 -  
2040 Regulation 19  
Consultation**

Land to south and west of  
Shedfield Lodge

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Client: English Oak Care Homes

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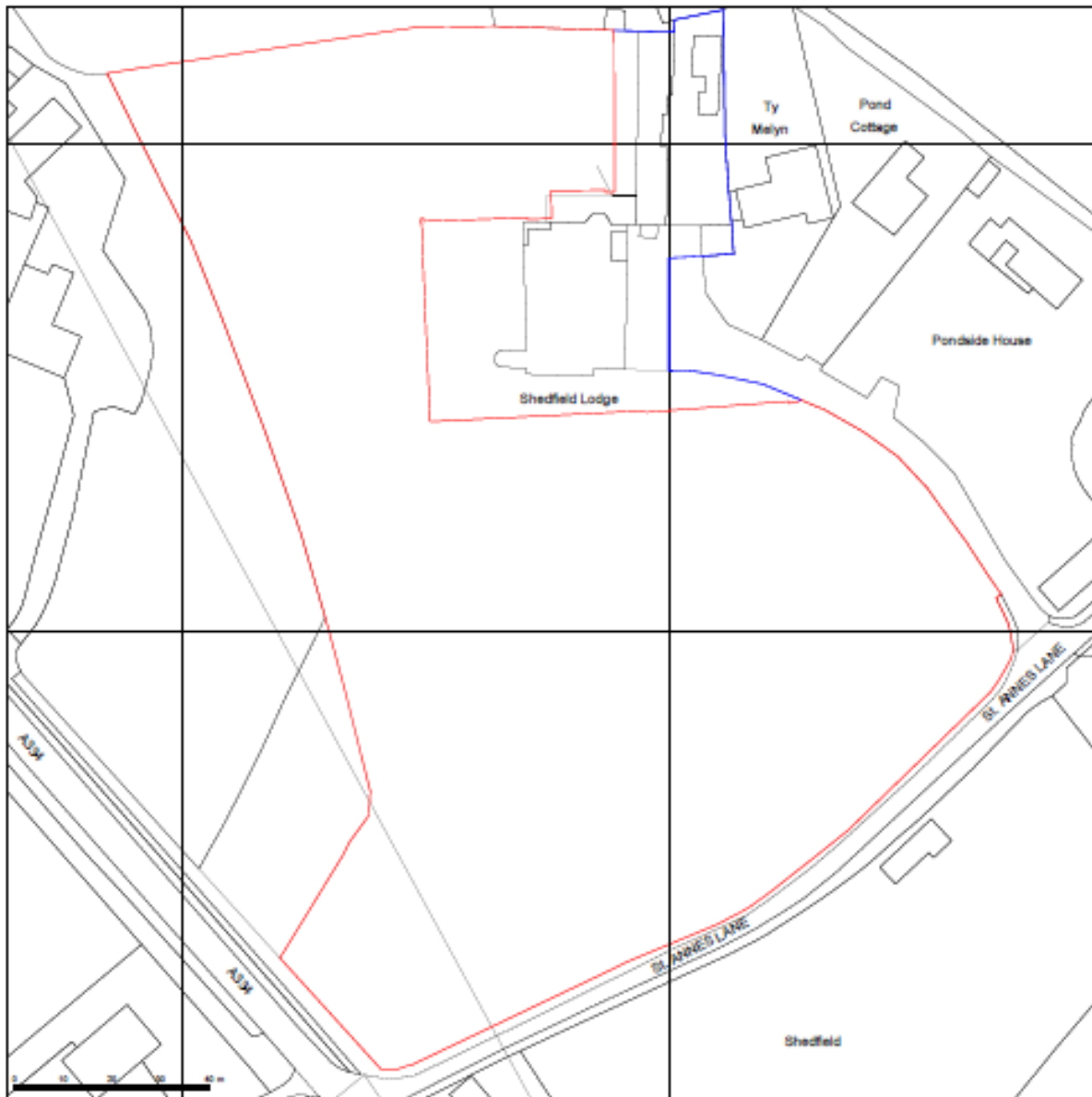
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## 1.0 [Introduction](#)

- 1.1 These representations have been prepared by Southern Planning Practice Ltd on behalf of English Oak Care Homes, who have an option on the land to the south and west of Shedfield Lodge, one of their affiliated care homes, in response to the current Winchester District Local Plan 2020-2040 Regulation 19 public consultation.
- 1.2 The site has not been previously promoted to the Council for allocation however it was the subject of a pre-application with Winchester City Council for a new dementia care village.
- 1.3 We would like to emphasise that the Local Plan needs to ensure it is planning ambitiously to meet the Government's housing targets and the housing requirement for the district over the plan period and beyond. In particular the Local Plan must be planning for the aging populations needs. It is highlighted that the site next to Shedfield Lodge would provide an immediate, important contribution to Winchester City Council's elderly and specialist housing need over the plan period. The opportunity presented by the site is discussed throughout these representations.
- 1.4 English Oak Care Homes are a specialist in dementia care who provide luxury style hotel environment care homes in the region. They recognise the need to plan for specialist elderly care now as there is a clear identified need. The Need/Demand Report submitted together with these representations confirms that there is an identified need for older and specialist housing which is currently not provided for in the Local Plan.
- 1.5 These representations will respond to the Local Plan Regulation 19 Consultation and will also present the opportunity which the land at Shedfield Lodge provides. The Need/Demand Report provides further details on the vision for the site.
- 1.6 It is confirmed that in addition to the site is available, suitable, achievable and deliverable. Allocation of this site would help to meet Winchester's housing need in a sustainable way whilst also providing benefits to the local community and the District's economy.
- 1.7 The following plan details the extent of the site.



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## 2.0 [Response to Vision and Objections and Spatial Strategy](#)

- 2.1 The following provides a response to the two strategic policies, namely Spatial Policy SPI and Spatial Policy SP2, set out in the Regulation 19 Local Plan which relate to the visions and objectives and spatial strategy of the plan.

### *Spatial Policy SPI - Vision and Objectives*

- 2.2 Policy SPI confirms that the council is committed to the delivery of the vision and objectives of the Plan and will engage proactively with a range of partners to jointly find solutions to achieve high quality sustainable and inclusive development.
- 2.3 We largely support the Vision for Winchester District over the plan period. The objectives set out to deliver the vision are supported. In particular, the objective to provide homes for all is key to ensure that the Local Plan delivers high quality new housing to meet identified local needs, including older persons' and specialist housing. The Need and Demand report submitted together with these representations demonstrates that there has been, and will continue to be a significant increase in the aging population and in particular people requiring dementia care, as such we believe the vision and objectives of the Local Plan should reflect this changing demographic.

### *Spatial Policy SP2 – Spatial Strategy and Development Principles*

- 2.4 Strategic Policy SP2 sets out the spatial strategy to deliver new housing, economic growth and diversification.
- 2.5 The strategy identifies three spatial areas for which it sets out a development strategy for each. The two key areas identified for growth in the plan period are Winchester Town and the South Hampshire Urban Areas, each area is identified to make provision for 5,640 homes and 5,650 homes respectively. The third spatial area, Market Towns and Rural Area, is identified to make provision for 3,850 new homes. The site falls within the Rural Area. Whilst we are supportive that this area will make provision for some housing, as this spatial area covers a large physical area of the district, we believe that the council should be more ambitious in its housing numbers to fulfil both the housing need of the district and any unmet need arising from neighbouring local

authorities, particularly authorities within the Partnership for South Hampshire (PfSH) area. In particular, given the aging population, the council should be focusing more on the delivery of older persons' and specialist housing in light of the findings of the most recent Strategic Housing Market Assessment (SHMA). The need for additional older peoples housing and dementia care is evidenced by the fact that by 2050 an additional 350,000 older people will potentially need a care home bed. As such, we should be planning for this need now and not at the point it becomes an issue.

2.6 The development strategy for Market Towns and the Rural Area which sets out that development will be provided in the most accessible and sustainable locations, to support the vitality and viability of communities is supported. However, it is considered that the housing provision does not fulfil the district's housing requirement or fully accommodate the unmet needs arising from neighbouring authorities and in particular their elderly and dementia care. Therefore, it is considered that Shedfield is a sustainable settlement which is geographically well located in the PfSH area to accommodate unmet need arising from neighbouring authorities and which is capable of accommodating further development over the plan period. In light of this we would encourage the council to make provision for further homes in the Market Towns and the Rural Area by considering allocating further sites.

2.7 In summary, we support the Council's aim for the spatial strategy and policies to seek to support and enable appropriate development in the market towns and rural areas of the district to meet local needs whilst ensuring that proposals do not conflict with the policies which aim to respect the environment. However, we encourage the council to review the housing provision for this area, in particular the needs for older people and increase it to ensure it is in accordance with the Government's ambitious housing targets over the next five years and beyond. Section 3 of these representations further explores the housing provision for the district over the plan period.

### 3.0 [Response to Housing Provision](#)

3.1 The following section responds to the 'Homes for all' part of the Local Plan which seeks to determine the housing provision and then confirm how this will be delivered over the plan period.

#### *Strategic policy H1 – Housing Provision*

3.2 Strategic Policy H1 of the Regulation 19 Local Plan sets out the housing provision for the plan period to be circa 15,115 dwellings. It confirms that this housing provision will be split between the three spatial areas as follows:

- Winchester Town – circa 5,640 dwellings
- South Hampshire Urban Area – circa 5,650 dwellings
- Market Towns and Rural Area – circa 3,825 dwellings

3.3 Table H1 indicates that the housing requirement, as calculated using the standard method, is 13,565 homes over the plan period. It is disappointing that the council have not set out that this figure should be a minimum number of homes to be delivered over the plan period, as required by the current standard method set out in the NPPF. We therefore encourage the council to indicate this figure to be the minimum housing need to be ambitious to allocate a sufficient number and variety of sites to ensure that the Local Plan seek to support the Government's objective of significantly boosting the supply of homes as set out in Paragraph 60 of the NPPF.

3.4 As per paragraph 61 of NPPF, the outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. Further, as per the Planning Practice Guidance (PPG) Paragraph: 001 Reference ID: 68-001-20240205, the standard method for calculating local housing need provides a **minimum** (our emphasis) number of homes to be planned for. It clearly sets out that authorities should use the standard method as the starting point when preparing the housing requirement in their plan unless exceptional circumstances justify an alternative approach. We do not believe that there are any exceptional circumstances which would justify an alternative approach in Winchester district.

3.5 Indeed, in order for the Local Plan Review to meet the ‘positively prepared’ test of soundness as required by paragraph 35 a) of the NPPF, the Local Plan review must:

*“provide (ing) a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development”.*

3.6 It is pertinent to note that new standard method is proposed to use a baseline set at a percentage of existing housing stock levels, top up this baseline using a stronger affordability multiplier and remove arbitrary caps and additions so that the approach is driven by an objective assessment of need. In light of the proposed new standard method, the current housing requirement proposed in the Regulation 19 Local Plan is not ambitious enough to achieve the Government’s housing targets. It is therefore considered that the council should look to increase the housing requirement to ensure that it is appropriately and sufficiently planning for growth, in accordance with the Government’s housing targets.

3.7 Paragraph 9.18 confirms that *‘There are a large number of sites which already have consent for residential development, some of which have been completed since the start of the Local Plan period (2020), or which are allocated by the existing Local Plan but have not yet been developed.’* Together with the housing requirement calculated under the current standard method, the housing provision over the plan period is confirmed to be 15,465 homes. Of this figure it is confirmed that 3,170 dwellings have been completed from 2020-2023 since the start of the plan period. This equates to approximately 20.5% of the overall housing provision. In addition, 6,780 dwellings (43.8%) of the housing provision are outstanding planning permissions and 745 dwellings (4.81%) are other commitments from previous Local Plans. Therefore, only 18.6% are new proposed allocations in the Regulation 19 Local Plan and 1,895 (12%) dwellings have been indicated as windfall development. In our view, it is not considered that the plan has been positively prepared and will therefore not meet the tests of soundness with only 18.6% of the housing provision over the plan period coming from existing commitments. We therefore urge the council to look at allocate further sites to boost and bolster the housing supply throughout the plan period.

3.8 As demonstrated by the figures above, it is clear there is an over reliance on previously allocated sites, some of which have been built out and others which are complex brownfield sites which have not come forward in previous plan periods (namely Station Approach and the Central Winchester Regeneration Area formerly Silver Hill). Therefore, the deliverability of several of the



allocated sites proposed to be carried over from the current Local Plan is questioned, particularly those which include the provision of older person and specialist homes which at present are mainly complex brownfield sites.

3.9 In addition to meeting their own housing needs, Winchester District needs to plan to accommodate some of the unmet need arising from the neighbouring authorities as required by the PfSH Statement of Common Ground. Paragraph 24 of the NPPF states that:

*“Local Planning Authorities... are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries”*

3.10 Paragraph 26 of the NPPF goes on to require that:

*“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere”.*

3.11 In light of the new Government’s ambitious housing targets and the aging population, as evidenced in the Need and Demand Report submitted with these representations, it is considered that the unmet need from neighbouring authorities could increase and therefore, in accordance with the PfSH Statement of Common Ground, further provision should be made to accommodate the resultant unmet need to ensure the plan is effective and meets the tests of soundness. Further, it is acknowledged that older person and specialist housing provision can be provided in Winchester as it is centrally located in the PfSH area.

3.12 Another pertinent point to note with regards to the proposed site allocations is the impact which the recent mandatory Biodiversity Net Gain (BNG) will have on the capacity of these sites. The requirement for BNG onsite may have a significant impact on the ability for the sites to deliver the number of homes they are allocated for. Therefore, to ensure that the Local Plan can meet the identified housing needs and is positively prepared, the Council need to ensure that the housing numbers each site is proposed to be allocated for is realistic and achievable. It is considered that the Council should also look to further medium sized sites to assist in the delivery of the shortfall of homes which may be generated through the BNG requirement As set out in Section 4 of these

representations, the land at Shedfield Lodge provides a key opportunity to allocate further land in a highly accessible, sustainable location to deliver the required housing Winchester needs over the plan period.

#### *Strategic Policy H5 – Meeting Housing Needs*

- 3.13** This policy confirms that development proposals will be supported where they provide housing of a type, size and tenure that contributes towards meeting housing needs and provides an acceptable level of amenity for its occupiers in line with the other policies in this Plan. It sets out that proposals for well-designed specialist and supported housing (including older persons housing) will be supported where the site is in accordance with other policies and is an appropriate location to allow integration into the local community, in close proximity to local facilities and services, and can be easily accessed by sustainable transport and an appropriate tenure mix is provided. Schemes of 50 dwellings or more should include an element designed and marketed to meet the needs of older persons, or other local specialist needs, and affordable units should be provided in the same proportion as the requirements for the site as a whole. The amount of specialist and supported housing should be in line with local needs, market intelligence and site viability. In applying this policy, the Council will take account of the nature of the scheme and the practicalities of providing and managing affordable units.
- 3.14** The proposed policy is largely supported; however it is considered that each proposal for Specialist and Supported Housing should be judged on a case by case basis, particularly where the provision for dementia care is concerned. In some instances, occupants of the housing cannot undertake day to day tasks on their own and require around the clock care, it is therefore considered that such housing does not need to be well integrated in the local community and in close proximity to local services and facilities as there would be no benefit as a result.
- 3.15** Strategic Policy H5 does not set out a specific housing provision for Specialist and Supported Housing which is disappointing. In light of the findings of SHMA, in particular Paragraph 6.6 which confirms that Winchester is projected to see a notable increase in the older person population, with the total number of people aged 65 and over projected to increase by nearly 50% over the 20-years to 2036. This compares with overall population growth of 21% and a more modest increase in the Under 65 population (increasing by 13%). From this it is evident that Winchester's need for Specialist and Supported Housing is going to be significantly higher than the country's overall population growth and as such should be planning accordingly to meet this need.

3.16 In addition, Paragraph 6.15 of the SHMA sets out:

*“Of particular note are the large increases in the number of older people with dementia (increasing by 74% from 2016 to 2036) and mobility problems (64% increase over the same period). Changes for younger age groups are smaller, reflecting the fact that projections are expecting older age groups to see the greatest proportional increases in population. When related back to the total projected change to the population, the increase of 3,100 people with a mobility problem represents 12% of the total projected population growth.”*

3.17 This further confirms that there is a significant need to provide dementia care as part of the Specialist and Supported Housing. It is emphasised that the land south and west of Shedfield Lodge can provide a key contribution to meeting the current and future Specialist and Supported Housing needs in Winchester District. Further details on the opportunity are provided in Section 4 of this Statement.

#### 4.0 [Land west and south of Shedfield Lodge – The Opportunity](#)

- 4.1 The site is located to the west and south of Shedfield Lodge which is located approximately 5km to the east of Botley. The whole site extends to approximately 1.92ha. The site is located immediately adjacent to Shedfield Lodge, an existing care home affiliated to English Oak Care Homes.
- 4.2 The site is largely unconstrained and it presents a significant opportunity to provide a logical extension to the existing care home facility to assist in meeting the Specialist and Supported Housing needs of the local community as well as helping Winchester City Council meet its ongoing housing requirements, and the unmet need arising from the wider PfSH area.
- 4.3 The aspiration is to provide a new care village which would comprise self-contained Specialist and Supported Housing for older people and those with dementia. The site could accommodate different types of housing and also provide on site facilities including a restaurant and other facilities for occupants. The site would be appropriately landscaped to provide enrichment for the occupants and also provide Biodiversity Net Gain.
- 4.4 As expressed, there is a need to boost the housing provision in line with the Government's aspirations, and in particular housing for older people therefore we urge the council to look at the clear opportunity presented by the site adjacent to Shedfield Lodge.
- 4.5 The site presents a rare opportunity for an unconstrained site in a sustainable countryside location to be developed to deliver much needed high-quality Specialist and Supported Housing for people within the District. The proposed development would be wholly consistent with the existing use of Shedfield Lodge. Please see the latter sections of the Need and Demand Report which provide further details on the site and present the opportunity and vision.
- 4.1 In accordance with the definition of 'deliverable' within the NPPF (2023), the site is available for development now, is in a suitable and sustainable location for future residential development and it is achievable with a realistic prospect that housing will be delivered on site within five years following the sites allocation.

## 5.0 Conclusion

- 5.1 It is considered that as currently drafted, the emerging Local Plan Review is not positively prepared in accordance with paragraph 35 a) of the NPPF and is therefore unlikely to assist the Government in its objective to significantly boost the supply of new homes and in particular Specialist and Supported Housing needs. The draft Local Plan does not appear to have fully assessed the allocations which are carried forward from the current local plan. Those carried forward are yet to deliver, these include brownfield sites which have most of the limited care provision on, when the need is **now**, and the capacity of the proposed site allocations do not appear to have taken into account the mandatory requirement for BNG and this impact on potential housing numbers.
- 5.2 To provide further homes for older people, it is considered that the Council should allocate further sites of varying size to provide a flexible, responsive and deliverable housing land supply over the plan period. Both additional greenfield sites and previously developed land in sustainable areas, should be allocated to enable the Local Plan to meet its objectively assessed need and to and be found 'sound' by an Inspector. In this respect, we would like to highlight the suitability of the land south and west of Shedfield Lodge which is suitable to come forward in the plan period and would provide a key contribution to the small-medium sites which would be able to deliver in the early years of the plan period.
- 5.3 In accordance with the definition of 'deliverable' within the NPPF (2023), the land at Shedfield Lodge is available for development now, it is a suitable and sustainable location for future residential development and it is achievable with a realistic prospect that housing will be delivered on site within five years following its allocation.
- 5.4 In summary, the land at Shedfield Lodge would provide many benefits to Shedfield and the surrounding Winchester District, including:
- Provision of homes for older people and dementia care in a sustainable location;
  - Contribution of a mix of size, type and tenure of Specialist and Supported Housing, including much needed affordable housing, to Winchester's housing land supply;
  - Direct and indirect employment for local people through the provision of new Specialist and Supported Housing.

- 5.5 In light of the above and the details provided in these representations, it is requested that the Council review their allocated sites together with their housing requirement and look to allocate additional small and medium sites, such as the additional land at Shedfield Lodge to meet Winchester's older persons and specialist housing need over the plan period and beyond.
- 5.6 We trust the information contained within these representations together with the Need and Demand Report is sufficient, however should you require any further information please do contact us.