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Dear Sir/Madam,

Land at 10 Harestock Road – Regulation 19 Representations (Hazeley Developments)

Response ID: ANON-AQTS-3BBP-Z

On behalf of Hazeley Developments Ltd ('Hazeley'), Savills is responding to the Winchester City Council (WCC) Local Plan: Regulation 19 Consultation ('Reg 19 Consultation') with a focus on the promotion of Land at 10 Harestock Road, Winchester ('10 Harestock Rd').

Hazeley made representations to the Local Plan Strategic Issues and Priorities Consultation in April 2021 and to the Regulation 18 Consultation in December 2022 detailing that 10 Harestock Rd provides a logical and sustainable location for future housing growth. Hazeley's Regulation 18 ('Reg 18') Representations are appended to this letter and key excerpts are referenced where appropriate.

The Development Opportunity

Land at 10 Harestock Road has capacity to deliver around 12 dwellings. Hazeley's aspiration is for the site to deliver a sustainable, sensitively designed development which responds to the existing urban form of Harestock and Littleton. It will create a highly sustainable place responding to the opportunities offered by the full range of local facilities within the nearby shopping parade and excellent access to public transport. It will be a place with a variety of choices to live and opportunities for social interaction. It will be welcoming, have a strong sense of identity and allow the surrounding nature and landscape to form an integral part of the development.

As detailed in the Reg 18 Reps, a residential development on 10 Harestock Road would be contiguous with the built-up extent of the settlement and would be adjoined by existing built developments on three sides. When viewed in conjunction with the proposed redevelopment of the Sir John Moore Barracks (Draft Policy W2) the allocation of 10 Harestock Road would represent an entirely logical 'insertion' to the Barracks site.

Should the LPA not wish to formally allocate the Site in isolation, the settlement boundary of Winchester could readily be realigned to include 10 Harestock Road and the surrounding houses (shown in blue hash on Fig 1 below), dovetailing neatly with the Sir John Moore Allocation (orange boundary).

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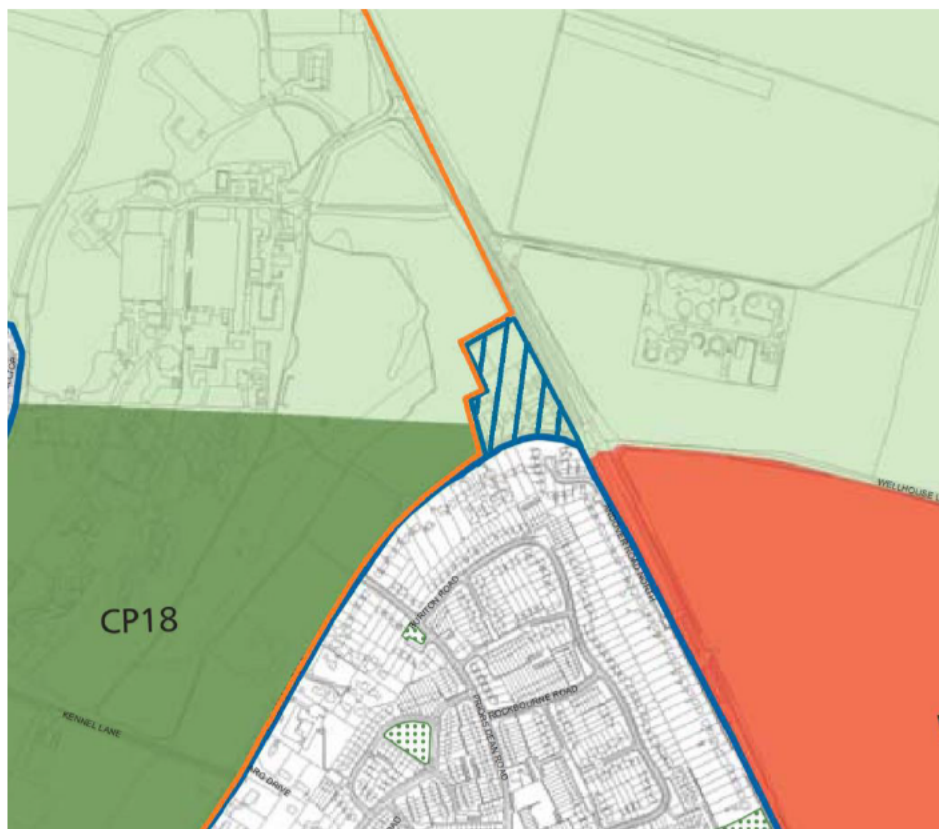
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A Pre-Application submission was made to WCC in December 2021 with a meeting being held on 1st March 2022 and written feedback being issued by the LPA on 26th May 2022. The pre-application has greatly assisted Hazeley in coming to an achievable quantum, form and massing of development for the Site.

Figure 1: Proposed Settlement Boundary Realignment



To summarise the opportunity:

- Development of the site would present a logical, sympathetic extension to the existing settlement immediately adjacent to the settlement boundary and bounded along the eastern and southern edge by existing residential development
- Development would be well located to existing services and facilities
- The site is not subject to any landscape designation constraints, nor does it form part of the South Downs National Park
- The site is not within a conservation area and would not have a harmful impact on any designated heritage assets
- The site is within Flood Zone 1, having the lowest probability of flooding
- The development of the site presents opportunities to enhance the visual amenity of the area through a robust landscaping scheme, particularly along site boundaries

- Development is capable of being delivered without impacting on biodiversity and will create opportunities to develop enhanced habitats
- The site represents a much more logical 'rounding off' of the settlement whereas other options could result in a significant and harmful encroachment of development into the open countryside.

Figure 2: Proposed Site Layout



Comments on the Proposed Amendments to the NPPF

Consultation on the Government's proposed reforms to the NPPF ran from 30 July 2024 to 24 September 2024. It is anticipated that the revised NPPF will be published in December 2024. The proposed revisions will make significant changes to the current document, not least in the shape of a new standard method for calculating housing needs.

Hazeley share the concerns of the Home Builders Federation (HBF) that Councils such as WCC will, in the face of increases in its housing needs, seek to move quickly to submission in order to benefit from the transitional arrangements. Whilst it is for the Council to decide on the timescale for the submission of its local plan this cannot be at the expense of the documentation and the evidence required on the submission of a sound local plan. For example, the Council will need to ensure that it has taken into account the impact of any changes resulting from the NPPF in neighbouring areas as part of its duty to co-operate. While the proposed amendments can only be given limited weight with regard to the local plan at this point in time it is important to note at Inspectors are already asking Council's to provide justification for the number of homes being planned for and it will be necessary for WCC to consider the implications of the changes with regard to this local plan.

The revised standard method calculation generates a need of **20,333 homes** over the plan period, or **1,099 dwellings per annum**, approximately **7,000 homes** more than is currently being planned for, reinforcing the importance of planning positively and highlighting just how acute the affordability crisis is within Winchester and the wider District. While Hazeley recognise the transitional arrangements, it is considered that WCCs attempt to rush their Local Plan through examination to avoid delivering the much-needed homes in an area with a growing affordability crisis is not in the spirit of the housing growth agenda being delivered by the new Government. In a District with an affordability crisis, increasing house prices and a strong market it is not in the spirit of the NPPF to plan for the Minimum, unless exceptional circumstances, which WCC do not have, justify otherwise.

The importance of identifying and allocating more land for housing has been very clearly set out by Deputy Prime Minister Angela Rayner in her letter, 'New Homes Accelerator Programme to Unblock Thousands of New Homes' [dated 29th August 2024] which sets out

*"It is because of this I know that, like every member of the Government, you will feel not just a professional responsibility but a **moral obligation to see more homes built**. To take the tough choices necessary to fix the foundations of our housing system. And we will only succeed in this shared mission if we work together – because **it falls to you and your authorities not only to plan for the houses we need**, but also to deliver the affordable and social housing that can provide working families with a route to a secure home" [Savills emphasis].*

Hazeley therefore consider that the Local Plan has not been positively prepared in accordance with the existing NPPF. Should the draft NPPF remain as currently presented particular consideration will need to be given to Paragraph 227 which states:

"Where paragraph 226 c) applies, local plans that reach adoption with an annual housing requirement that is more than 200 dwellings lower than the relevant published Local Housing Need figure will be expected to commence plan-making in the new plan-making system at the earliest opportunity to address the shortfall in housing need."

The transitional arrangements described in Paragraph 227 will require the Council to prepare a new plan immediately. However, it is often the case that without an incentive to review a recently adopted plan these are rarely undertaken rapidly. Therefore, a strong review policy is required that set out clear dates as to when a new plan will be submitted, and the consequences should that plan not come forward in the agreed timescale. Alongside the HBF, Hazeley would recommend a policy is included in the next iteration of the plan requiring that a review commences within a year of adoption.

Regulation 19 Local Plan

Hazeley made detailed representations to the Reg 18 Consultation in December 2022 and would seek to rely on the comments made therein. Notwithstanding this, Hazeley have sought to reiterate and expand upon their previous comments where necessary and appropriate below. An online submission has also been made for completeness.

❖ Strategic Policy SP1 – Vision and Objectives

Hazeley would like to reiterate their support for the overall vision set out at page 19 of the Reg 19 Local Plan. The Land at 10 Harestock Road can help to achieve WCC's aspirations by delivering high-quality homes in a sustainable location that will meet a range of needs and aspirations, including 20-minute neighbourhoods, sustainable transport corridors and affordable housing.

❖ Strategic Policy SP2 – Spatial Strategy and Development Principles

The Local Plan's development strategy identifies three 'spatial areas' within Winchester District (Strategic Policy SP2). Strategic Policy SP2 sets out an indicative requirement of 5,640 dwellings in Winchester Town (37.2%), 5,650 dwellings in South Hampshire Urban Areas (SHUAs) (37.3%) and 3,850 in the Market Towns and Rural Area (MTRAs) (25.5%).

Hazeley raises no objection to a spatial strategy that delivers a balanced approach to housing that meets the needs of the Authority as a whole, however, the R19 LP's spatial strategy insufficiently prioritises Winchester Town as the most sustainable location for growth. The proposed distribution of development commits disproportionate growth to areas with limited active travel and public transport infrastructure.

Despite the recognition within the Reg 19 Local Plan that Winchester is the most sustainable location for growth, Policy SP2 sets out an indicative requirement of 5,640 dwellings in Winchester Town (37.2%). The spatial strategy therefore proposes deliver some 63.8% of growth outside of the Winchester Town Area and therefore, as recognised in the Council's own evidence, in the least sustainable locations in the District.

Hazeley do not consider that all new development should be located within the Winchester Town area, as there are some sustainable locations within the SHUA and MTRA, however the focus and distribution of development should be greater in and around Winchester Town.

❖ Policy CN3 – Energy Efficiency Standards

Policy CN3 would require all new development to demonstrate net zero operational carbon onsite by ensuring energy use standard for all new dwellings of 35kwh/m²/year and space heating demand of less than 15 kwh/m²/year. This would be calculated using an energy performance predictive modelling tools such as Passivhaus.

Hazeley recognise that Policy CN3 is clearly a very significant policy in terms of the Council's ambition to deliver net zero development as well as the delivery of much needed new housing and non-domestic buildings in the district. Hazeley supports the Council's commitment to delivery of net zero housing. However, in its current form, we do have significant concerns that the Policy is unsound and could lead to a reduction in the delivery of much needed private and affordable dwellings.

In line with the HBF, whilst Hazeley agree with the Council that there is a need to act to reduce carbon emissions they would disagree that this needs to be undertaken through the Local Plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the county, in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensure that improvements to building standards are actually deliverable from the point at which they are introduced.

Echoing the sentiments of the HBF, Hazeley do not consider that WCC have properly and fully considered the implications of this policy on the deliverability and viability of new development. Firstly, the proposed standards are higher than the proposed FHS expected to be introduced in 2025 and seemingly will require higher levels of fabric efficiency. This will require new skills and materials that may not be readily available, and which could slow delivery in the short to medium term as these are developed. As such consideration will need to be given as to the delivery rates of development in the early years of the plan period with fewer homes potentially coming forward in this period as these much higher standards will take time to embed. Hazeley agree with the conclusions drawn by the HBF in their Reg 19 representation to WCC.

WCC must also ensure that the costs of its implementation are properly reflected in the viability evidence. The WCC Local Plan Viability Study states on page 15, paragraph 3.31 that there are a range of sources as to costs and the assumption made is that it will fall in the range of an additional 5.0-5.8% on base build costs over the 2021 Building Regulations Part L update. Based on work by The Future Homes Hub, Hazeley considers this is an underestimate of the costs.

❖ Policy CN4 – Water Efficiency Standards

Hazeley object to the proposed potable water consumption figure of 100 litres per person, per day quoted in Policy CN4. As expressed by the HBF in their representations the lower water standard of 100 l/p/pd is not consistent with national policy which states that 110 l/p/d is sufficient in water stressed areas and therefore the policy cannot be deemed sound.

❖ CN8 – Embodied Carbon Assessment

As expressed by the HBF in their representations, there is concern that the requirement to undertake an accurate whole life carbon assessment is compromised by the lack of data across building material as to their embodied carbon. Until there is greater accuracy, we question whether the whole life carbon assessments can be sufficiently robust at present to be part of decision making.

As with reducing carbon emissions from operational energy use Hazeley considers it best that such matters addressed at a national level to avoid the fragmentation of approaches and standard across different areas. As detailed by the HBF, the housebuilding industry is working with the Future Homes Hub to develop a roadmap to reducing embodied carbon and whilst Council's may want to go further faster, there are concerns that this will impact on the deliverability of development with a disproportionate impact on SME developers and sites such as 10 Harestock Road.

❖ Policy D6 - Brownfield development and making best use of Land

The R19 LP as such has been developed with a brownfield first approach (Policy D6). Hazeley supports and does not dispute the importance or principle of utilising brownfield sites. Indeed, 10 Harestock Road is partly previously developed, comprising the existing house and residential curtilage. However, Hazeley does raise concerns regarding the fact that the WCC intends to restrict the release of new greenfield sites until 2030, under Strategic Policy H2 (housing phasing and supply), due to the finite source of brownfield land, the often-harder viability challenges resulting in reduced affordable housing provision and the strong message from Central Government to increase delivery.

In addition to the above, there has been a historic under-delivery of allocated brownfield sites, such as the Central Winchester Regeneration Area and Station Approach Regeneration Area which have a combined capacity of 550 dwellings. These have been carried forward from the previous Local Plan, and neither are subject to a submitted planning application which indicates there is unlikely to be progress made towards their delivery at the early stage of the draft Local Plan period. Hazeley therefore raise concerns with policy D6 and Policy H2 on the grounds that they would restrict housing delivery, particularly affordable housing delivery (as Policy H6 requires a reduced provision on brownfield sites) in the height of the housing crisis.

❖ H1 – Housing Provision & Policy H2 – Housing Phasing and Supply

Policy H1 dictates a local housing need for WCC at 676 dwellings per annum which equates to 13,565 homes over the proposed plan period 2020 to 2040.

In line with the comments of the HBF, Hazeley consider that the plan period should be amended from 2020 – 2040 to 2024 – 2041, as the plan should be forward looking and not reliant on historic delivery and should have a minimum 15 year outlook, taking into account any potential delays during EIP to subsequent adoption. This amended plan period, using the current standard method would have a housing need of 11,492, which alongside the unmet need allowance of 1,900, less the provision of 350 dwellings to the South Downs National

Park would result in a total district housing requirement of **13,042 dwellings**. When considering this against the identified housing provision (minus completions in years removed from the plan period) of 12,295 dwellings as set out in Table H1, WCC would have a **shortfall of 747 dwellings**.

Hazeley consider that ideally WCC should be planning for their new draft standard method requirement of 1,099 dwelling per annum or 20,333 dwellings across the current plan period (1 April) 2020 to (31 March) 2040 or 18,683 dwellings across the plan period above (1 April) 2024 to (31 March) 2041. These numbers are noted to be before the unmet need allowance is added. Once the unmet need amount is incorporated, WCC would have a shortfall of 6,418 dwellings and 7,938 dwellings respectively for the two plan periods. WCC therefore need to include an increased number of allocations within their Local Plan.

If WCC alongside, the 15 other authorities at R19 stage ignore the new standard method, they would deliver c. **33,500 homes per year less** than they will be required too under the new NPPF, worsening the housing crisis. This point is particularly fundamental in WCC where affordability is one of the worst in England.

If WCC choose not to plan for their new draft standard method requirement, which Hazeley fundamentally disagrees with and considers to be at odds with the Government growth agenda due to the acute housing crisis, it is considered that they should be planning positively as a minimum in line with the NPPF. Hazeley note that currently WCC are planning negatively in comparison to their historic delivery rates, which contradicts the vision of the government who in the NPPF consultation set out *“Given the chronic need for housing we see in all areas, we should celebrate strong delivery records without diluting future ambitions”*.

Finally, Hazeley note that WCC should be taking on a greater proportion of the PfSH unmet need – under both the current need requirements which as planned for would result in a c. 9,000 dwelling shortfall until the next plan period and under the new shortfall of over 35,000 once the draft standard method is published. The reason for the lack of adequate provision to PfSH is clear within the SoGC from Havant Borough Council which notes that there has been no engagement between the Regulation 18 and Regulation 19 stages from WCC. This is deemed unacceptable and raises issues regarding the legal compliance and soundness of the plan.

Hazeley considers that without adopting either of the above approaches (i) plan for the new draft standard method or (ii) plan in line with historic delivery, and for the plan to accommodate a greater proportion of the PfSH unmet need, WCC cannot be considered to be planning positively for growth and will not deliver the much needed affordable housing or tackle the acute affordability crisis.

Conclusions

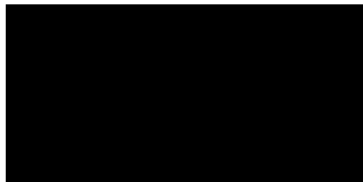
This representation has been prepared by Savills, on behalf of Hazeley in response to the Winchester Local Plan Regulation 19 Consultation. In submitting these representations, Hazeley wishes to set out in the strongest possible terms its support for the identified opportunity to bring forward and plan positively for a development at 10 Harestock Road.



Being sustainably located and environmentally unconstrained, Land at 10 Harestock Road is well placed to accommodate this additional housing quantum whether it be as a formal allocation or via a realignment of the defined settlement boundary to dovetail with the Sit John Moore Barracks allocation, either of which would sit comfortably in the local landscape.

While Hazeley recognise the transitional arrangements, it is considered that WCCs attempt to rush their Local Plan through examination to avoid delivering the much-needed homes in an area with a growing affordability crisis is not in the spirit of the housing growth agenda being delivered by the new Government. In a District with an affordability crisis, increasing house prices and a strong market it is not in the spirit of the NPPF to plan for the Minimum, unless exceptional circumstances, which WCC do not have, justify otherwise.

Yours faithfully,



Savills Planning

CC [Redacted], Hazeley Developments

Encs.