

# VISTRY PARTNERSHIPS – LAND AT PITT VALE, WINCHESTER

## WINCHESTER REG 19 LOCAL PLAN REPRESENTATIONS

### Introduction and Vision

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

Do you consider the supporting text and policy are

Legally Compliant      **Yes**    No

Sound                      Yes    **No**

Complies with the DtC    Yes    **No**

Give details to support your answer above:

The draft Local Plan sets out the proposed spatial strategy, comprising 5,640 homes to be allocated to Winchester Town, 5,650 to South Hampshire Urban Areas and 3,850 to Market Towns and Rural Area. This remains similar to that set out within the preceding Regulation 18 Consultation.

Winchester Town is the largest settlement in the District, benefiting from strong transport links to London and other locations. The Draft Local Plan notes there are ‘...*significant patterns of commuting due to the mis-match [sic] of workers and residents and its strong travel links to London*’. It is the District’s main settlement and provides a clear basis for the continued direction for strategic planned growth through the next plan period. We therefore recommend and support that a larger number of homes be allocated to Winchester to reflect its status as the largest settlement and its importance in terms of connecting the District to surrounding locations and destinations.

A further benefit of allocating additional sites at Winchester Town is the reduction in need for people to commute to jobs or transport facilities within the Town and subsequent reduction in carbon emissions, thereby supporting the emphasis on the *climate emergency* throughout the draft Local Plan. Additional development in Winchester would also support the viability of the town centre and its role as the main service centre and job provider in the District.

Notwithstanding, Vistry Partnerships are concerned by the strategy presented by the Council in this Regulation 19 Plan for a number of reasons. Firstly, as detailed in our representations on Policy H1, the sources of housing supply currently identified in the Plan will not meet the identified housing requirement. Moreover, whilst the Council has accelerated the commencement of the Regulation 19 consultation, in the hope of having the Plan examined under the current December 2023 NPPF and the current Standard Method, it is ultimately unlikely to escape the necessity of having to allocate

many new sites for residential development, in addition to those currently proposed for such. This is, of course, in addition to addressing unmet needs arising in partner Local Authorities, where the Standard Method is also expected to rise.

Therefore, whether through changes made before the Plan's submission, Main Modifications arising from the Examination or via an immediate review (if the Plan is found to be sound), the Council is going to have to plan proactively to deliver a far higher level of housing than is presently envisaged. This calls into question the soundness of the spatial strategy and development principles presented in Policy SP2. This is to say that even if the Plan is capable of adoption in 2025, as the Council hopes, its spatial approach risks becoming redundant almost from the outset of the plan's adoption.

On this basis, the Council will find itself needing to allocate new strategic allocations/strategic growth areas to meet the dramatically higher housing targets that arise from the Government's proposals. These new strategic sites will invariably take a long-time to come forward. The Council should therefore be looking positively to proceed on the basis of balancing delivery of much needed new homes through the allocation of both large strategic scale sites and an extensive suite of small/medium-sized sites. These small/medium-sized sites can be brought forward more easily as self-contained developments, thereby offering a consistent supply throughout the Plan period.

Achieving a balanced supply is also essential when it is remembered that the current Development Plan (LPP1) has not been effective at consistently sustaining a housing land supply or delivering against its targets throughout the Plan-period. This is partly because the reliance upon strategic allocations has resulted in delayed delivery compared to anticipated trajectories. The challenges for delivering large-scale allocations are well-documented, with infrastructure requirements, the need for strategic masterplanning and multiple landownerships/land interests acting together (often in combination) to impede timely implementation.

Indeed, LPP1 required 12,500 dwellings over the Plan's 20-year period (or 625 dpa). Over the first 9 years of the Plan 4,640 dwellings were completed (1,000 dwellings short of the total requirement of 5,625 homes for this period). It is also notable that the LPP1 trajectory expected 6,548 dwellings to be completed for this 9-year period (2011/12 to 2019/20), but actual completions fell nearly 2,000 short (i.e. 1,908 dwellings below what the Plan had expected).

In view of the above, we advocate the Local Plan should be modified (at this stage) to include additional sites at Winchester. Land at Pitt Vale provides an opportunity as a medium sized site to contribute towards the Council's housing supply and prompt delivery in the early stages of the plan period. This is essential to start future-proofing the new Plan in anticipation of the fundamental change in the level of housing that will need to be provided should the Government's consultation proposals be implemented (as seems highly plausible, given manifesto commitments and the strength of the parliamentary majority).

Notwithstanding the impending changes to national policy and housing targets, we encourage the council to take the opportunity through the new plan to avoid the same delayed housing delivery situation arising again through the next plan. Therefore, the identification and allocation of additional medium and smaller sites for allocation at Winchester Town now is of paramount importance for the success of the new Draft Local Plan's strategy and delivery.

What modifications are necessary to make this policy legally compliant or sound?

It is important that the draft Local Plan provides sufficient diversity in its housing site allocations, in particular providing a range of site sizes and locations.

Particular emphasis should be placed on medium and smaller sized sites at Winchester Town to prevent continuing delayed and under delivery in the district's most sustainable settlement.

Vistry Partnerships recommends the draft Local Plan should allocate additional sites which are immediately available and deliverable.

What is your suggested wording or text for the policy:

No specific wording is proposed. Policy SP2 cannot be rendered sound through simple modifications to its wording, a more significant review is required to the spatial distribution with greater number of homes allocated in Winchester.

## Carbon Neutrality and Designing for Low Carbon Infrastructure

### Policy CN1 – Mitigating and Adapting to Climate Change

Do you consider the supporting text and policy are

Legally Compliant      **Yes**      No

Sound                      **Yes**      No

Complies with the DtC **Yes**      No

Give details to support your answer above:

Vistry Partnerships is committed to the move to 'net zero' and supports Draft Policy CN1 in principle.

It is welcomed that the policy sets out a design process through which development proposals can consider and incorporate varied forms of low carbon solutions. Additionally, it is welcomed that the policy recognises the role of broader green infrastructure provision (which is multifunctional in purpose) as contributing positively to avoiding and/or mitigating climate change effects. This will help to influence the masterplanning and design process, ensuring that sustainability measures are considered at an early stage and are holistically integrated.

What modifications are necessary to make this policy legally compliant or sound?

N/A

What is your suggested wording or text for the policy:

N/A

### Policy CN2 – Energy Hierarchy

Do you consider the supporting text and policy are

Legally Compliant      **Yes**      No

Sound **Yes** No

Complies with the DtC **Yes** No

Give details to support your answer above:

Vistry Partnerships support the emphasis on the energy hierarchy and, through a fabric first approach, have designed their homes to require minimal energy demand. This will be achieved by having:

- Wider cavities with high levels of insulation
- Higher performing windows, doors and thermal bridging
- Improved airtightness
- Enhanced ventilation system to ensure adequate indoor air quality as homes get more airtight.

However, fabric efficiency is only one way of reducing energy carbon emissions. The Government examined the potential for increased fabric efficiency as part of the Future Homes Standard and concluded that the 2021 standard is sufficient and that national climate commitments can be addressed through the Future Homes Standard which will see all homes being zero carbon ready from 2025. Vistry Partnerships remain committed to the forthcoming Future Homes Standards and is well advanced in its forward thinking to achieve these standards when they are enacted.

What modifications are necessary to make this policy legally compliant or sound?

N/A

What is your suggested wording or text for the policy:

N/A

### **Policy CN3 – Energy Efficiency Standards to Reduce Carbon Emissions**

Do you consider the supporting text and policy are

Legally Compliant **Yes** No

Sound **Yes** **No**

Complies with the DtC **Yes** No

Give details to support your answer above:

Vistry Partnerships supports the move towards net zero and acknowledges the development industry has a key role to play to support this agenda.

The draft policy sets out a range of standards that (in summary) prohibit the use of fossil fuels for the purposes of heating or cooking. The policy also requires that 100% of the energy requirement for new dwellings is achieved from renewable generating sources.

Vistry Partnerships' primary concern with these proposed requirements is that of timescales. It is not clear that the housebuilding sector and the supporting supply chain will be capable of meeting the proposed policy requirements at the point the Local Plan is adopted in 2025. Many major housebuilders have signed-up to the House Builder Federation (HBF) 'Future Homes Delivery Plan', which sets out how the industry will transition to net zero carbon. This process of transition requires an interim step, with new homes being expected to be '*net zero carbon ready*' in the short-term, and fully net zero carbon in the medium-term. The '*Net Zero Carbon Targets*' report (Elementa, September 2022), which forms part of the Draft Plan's evidence base and is cited as a justification of this Draft Policy CN3, is silent on this important question of timing.

A related concern is the draft policy expects 100% of energy consumption required by new residential homes to be generated on-site via renewable energy generating schemes. This may be achievable in some instances, but it is unlikely that every new dwelling will be able to accord with this. The policy allows for some deviation where there are '*...exceptionally clear and compelling reasons*', but it is likely that many if not most residential developments will be unable to fully meet zero carbon until the wider power-generation network is free from carbon-based power stations.

The evidence base does not indicate whether on-site renewable generation (equivalent to 100% of domestic energy usage) represents a realistic proposition at this point in time and can be achieved at scale. Without this understanding, it is subsequently unclear whether meeting 100% of domestic energy needs from renewable sources could be guaranteed until the wider UK power grid / UK power generation network is free from carbon-generating power stations. The '*Net Zero Carbon Targets*' report (Elementa, September 2022), which forms part of the consultation evidence base, is again silent on this point.

The proposed space heating demand of <15 kWh/m<sup>2</sup>/year in Draft Policy CE2 would require Passivhaus fabric levels, which not only exceeds national building standards, but can be difficult to achieve at scale due to inexperience of trades people building to this standard in the UK. There is also a shortage of accredited professionals, certified materials and installers which significantly impacts the ability to meet the draft policy requirements. The policy must therefore allow for the market to catch up with policy aspirations. The additional build cost of 10-15% could also affect project viability and while technologies remain expensive, there may be an impact on affordable housing delivery. Therefore, the space heating demand requirement should be subject to viability considerations.

With regards to energy consumption, the proposed EUI figure of no more than 35 kWh/m<sup>2</sup> /year goes beyond the Future Homes Standard and will require tighter fabric requirements and renewable energy sources to achieve this net zero standard on operational energy. The current HEM model penalises renewable energy that is used in the home and not exported back to the grid. Therefore, it may take a considerable amount of fabric and technology adjustments in the specification to ensure a house type passes in HEM while meeting the EUI requirement. This EUI figure should therefore be expressed as an aspiration and not a requirement.

The proposed requirement for all new housing to demonstrate that they generate the same amount of renewable energy as they demand over the course of a year could be challenging to achieve for some homes. For example, it may not be appropriate to include PV panels on every roof due to

orientation vs. design requirements/views etc. , and therefore there must be some flexibility built into the policy to account for this.

Paragraph 4.27 of the Draft Local Plan suggests that energy performance can be calculated using Passivhaus Planning Package or CIBSE TM54. The use of Passivhaus Planning Package must be expressed as an aspiration and not a requirement. Use of Passivhaus is not easy to achieve at scale and there are viability considerations in relation to the associated increased costs of this method of calculation.

EUI requirements MUST be expressed as a site wide requirement, and not for individual dwellings. This is because some plots are smaller or may have rooms in the roof, impacting the ability to achieve the required number of PVs to achieve the referenced EUI levels on a plot-by-plot basis.

The Written Ministerial Statement (WMS) published on 13 December 2023 notes that Local Planning Authorities can seek to apply additional standards, but only when they have a well-reasoned and robustly costed rationale. Policy CN3 does not have sufficient evidence or rationale to support the requirements and it therefore fails against the WMS and is unsound.

The above should not be construed that Vistry Partnerships are suggesting Policy CN3 is wrong to be ambitious. However, in seeking to move ahead of building regulations and to go beyond the *Future Homes Standard*, the onus is on the Council to demonstrate what is envisaged is achievable and (importantly) achievable at scale, given the number of new homes that need to be delivered during the Plan-period. Vistry Partnerships suggests the standards specified in Policy CN3 should be phased in over the Plan-period to reflect the fact (acknowledged in the *Elementa Report*) that technologies become more established and widespread over time. Put more simply, what is technically feasible and scalable in 2024/25 will differ from what is achievable in 2030 and 2040.

[What modifications are necessary to make this policy legally compliant or sound?](#)

Winchester City Council (WCC) should have regard to the likely viability of the requirements in this draft Policy and should consider changing the wording to require new homes to be net zero carbon ready as the decarbonisation of the national grid is not within the control of housebuilders.

Vistry Partnerships recommend the proposed policies within the Draft Local Plan align with Building Regulations and Future Homes Standards rather than exceed them.

[What is your suggested wording or text for the policy:](#)

See above comments.

### **Policy CN8 – Embodied Carbon**

[Do you consider the supporting text and policy are](#)

Legally Compliant      **Yes**      No

Sound                      Yes      **No**

Complies with the DtC **Yes**      No

Give details to support your answer above:

The ability to undertake an accurate whole life carbon assessment is impinged by the lack of data across building material as to their embodied carbon. Until there is greater accuracy, such assessments will not be accurate.

It is highly unlikely that developers will know all materials to be used in a construction at the point of submission of an application. Details of materials is determined following the grant of planning permission and any embodied carbon report to be submitted with an application will not be accurate at that early stage.

What modifications are necessary to make this policy legally compliant or sound?

Remove the requirement for an embodied carbon report until there is sufficient data to ensure the reports are accurate.

What is your suggested wording or text for the policy:

As above

## High Quality Well-Designed Places and Living Well

### Policy D6 – Previously Developed Land

Do you consider the supporting text and policy are

Legally Compliant	<b>Yes</b>	No
Sound	Yes	<b>No</b>
Complies with the DtC	<b>Yes</b>	No

Give details to support your answer above:

As set out further in our representation on Policy H2, the proposal to artificially restrict the delivery of greenfield sites (in favour of brownfield redevelopment) runs contrary to the requirements of NPPF Paragraph 60. This states that;

*To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”. (our emphasis)*

The approach is inconsistent with national planning policies and not positively prepared.

What modifications are necessary to make this policy legally compliant or sound?

The reference to ‘prioritising’ the development of brownfield sites should be omitted from the policy wording.

What is your suggested wording or text for the policy:

As above.

## Sustainable Quality and Well-designed Places and Living Well

### Policy T1 – Sustainable and Active Transport and Travel

Do you consider the supporting text and policy are

Legally Compliant      **Yes**    No

Sound                      Yes    **No**

Complies with the DtC **Yes**    No

Give details to support your answer above:

Vistry Partnerships support this Draft Policy T1 and the inclusion of the 20-minute neighbourhood concept. The concept of a 20-minute neighbourhood is very interesting in promoting sustainable travel as it ensures new developments are located in sustainable locations close to existing infrastructure. In itself, this encourages new and sustainable communities which will help towards achieving the Council's overall vision and targets.

The 20-minute neighbourhood concept is vital in ensuring low carbon development. Given the prevailing rural nature of Winchester District, the 20-minute neighbourhood is not directly applicable for the majority of the Winchester urban area. Priority should therefore be given to those sites which meet the 20-minute neighbourhood concept in terms of site assessment.

Indeed, the concept of the 20-minute neighbourhood is fundamental in the context of promoting sustainable transport when undertaking site selection decisions. However, there is no evidence, either within the draft Local Plan or the Development Strategy and Site Selection document that the location of the sites in terms of the 20-minute neighbourhood concept has been considered. This omission is disappointing. Vistry Partnerships consider this should be an important, and evidenced, consideration in the site selection process.

#### Land at Pitt Vale, Winchester and the 20-minute Neighbourhood Concept

Land at Pitt Vale, Winchester is controlled by Vistry Partnerships and is a good example of a site which can exhibit the features of, and support delivery of a 20-minute neighbourhood.

With regards to the existing infrastructure, the proposed development at Land at Pitt Vale provides opportunities to further improve the existing cycle, walking and bus routes rather than requiring new infrastructure, setting the site apart from other draft allocations. Walking routes are available to local facilities, including Olivers Battery Road South shops with no improvements required.

TCPA have prepared an image demonstrating a 20-minute neighbourhood which incorporates 8 categories which are considered fundamental to the concept. This image is shown on page 129 of the draft Local Plan.

An assessment of how Land at Pitt Vale compares to each of the categories is considered below:

#### *A Place for All Ages*



Consultation will be undertaken with the local community as part of preparing an application for the site. This will specifically target all ages and seek to ensure that engagement is made with the broadest range of community groups achievable.

The development can provide for a wide range of types of homes and tenures being provided, all to a high-quality and accessible standard.

#### *Community Health and Wellbeing Facilities*

Development would contribute to local healthcare services via s106 and CIL.

Land at Pitt Vale is well connected to health services/facilities with a number within a 20-minute walk/cycle distance. Rather than listing all facilities, they are summarised below with a full list in the Vision Document which we will be resubmitting to the Policy Team under separate email cover as part of these representations to the Reg.19 Draft Plan:

- 13 x dental surgeries
- 4 x pharmacies
- 4 x GP surgeries
- The Priory Hair Lounge
- Friarsgate Medical Centre
- Royal Hampshire County Hospital

#### *Diverse and Affordable Homes*

It should be noted that Vistry Partnerships is the UK's largest provider of affordable housing in the private sector, an accomplishment achieved through developing and maintaining long-term, robust and sustainable partnerships built on a strong foundation of trust.

Development at Land at Pitt Vale would include a mix of house types and tenures which would reflect the latest Strategic Housing Market Assessment (2024) (and would reflect the latest data if the SHMA is updated). Development on the site would also provide a policy compliant quantum of affordable housing including rental and intermediate homes.

In line with any relevant policy, development would include accessible and adaptable homes in line with Building Regulations Part M4(2) and M4(3).

Vistry Partnerships, in being part of the wider Vistry Group, together with the recent acquisition of Countryside, allows an opportunity to draw on a range of different brands and housetypes in order to suit local need and reflect the local vernacular.

#### *Keeping Jobs and Money Local*

Land at Pitt Vale would be a primarily residential development with a community centre. As such it would not seek to adversely impact the vitality and viability of Winchester Town Centre. The site would provide economic benefits through job creation (during the construction phase), first home purchase revenue, additional demand for local services: through a Community Infrastructure Levy contribution and through a New Homes Bonus. It would further enhance the economy by providing

an opportunity to live in close proximity to job opportunities in the town centre and beyond (such as London).

The site is well located to Winchester City to allow future residents easy access via public transport to employment opportunities in the centre.

#### *Schools at the Heart of Communities*

Following the principles of the 20-minute neighbourhood, there are a number of schools within walking/cycling distance, including:

##### Nurseries

- Lanterns Nursery School
- West Downs Day Nursery
- Poppins Nursery
- Winchester Nursery
- Bright Horizons Winchester Day Nursery

##### Primary Schools

- St Peters Primary School
- Oliver's Battery Primary School
- Stanmore Primary School
- St Faith's Church of England Primary School
- Western Church of England Primary School
- The Pilgrims School
- Weeke Primary School
- Harestock Primary School

##### Secondary schools

- The Westgate School (this is also a Primary school)
- King's School

##### Sixth Form College

- Peter Symonds College

In addition, within a 20-minute cycle are the University of Winchester and Winchester School of Art.

Land at Pitt Vale is well placed to a large number of schools/nurseries and higher education and schools can be reached sustainably.

#### *Well connected paths, streets and spaces*

Residential development within Pitt Vale will offer true modal choice, prioritising walking and cycling in the first instance as a key component in developing sustainable neighbourhoods and healthy communities.

Pitt Vale's streets and residential blocks would be well connected, easily walkable and cycle friendly. There will be clear and obvious links to the adjacent Pitt Park and Ride in order to further promote sustainable travel.

The manner in which buildings meet the street, the level and type of uses at ground floor level, the ability to safely cross the street will all have a role in influencing the level of activity in the streets and spaces at Pitt Vale. Careful design will ensure there are well positioned and frequent doors and windows, as well as appropriate uses that can combine to create a strong and positive interrelationship between passers-by and residents, making for a more active, safer public realm.

Pedestrian routes would be well overlooked by surrounding buildings that have an interrelationship with the street.

A good network at Pitt Vale will provide choice and legibility, each type of street dictating its own particular design response to width, depth of threshold, presence of street trees and parking solution.

#### *Green places in the right places*

Land at Pitt Vale is a 23.7 ha site with the concept proposals providing approximately 8.4 ha developable area. This leaves 15.3ha of non-developable area which will form open space.

The green and blue infrastructure at Pitt Vale would be enhanced, reinforced and well managed to become an integral part of Winchester's neighbourhoods, making a healthier, more sustainable and better-quality place to live.

Opportunities will be taken that link together elements of green infrastructure to make a more comprehensive network.

Attractive open spaces will be provided in locations that are easy to access, with activities for all to enjoy, such as play, food production, recreation and leisure, etc. The development will encourage physical activity and promote health, well-being and social inclusion.

Biodiversity is important to aid the city's resilience. It helps the natural environmental balance, moderate temperatures and combats pollution. A Biodiversity Net Gain Feasibility Report has been undertaken by Ecosa and has been submitted in support of these representations. The report concludes that a gain of 172.16% of habitat units and a 9.77% gain of hedgerow units can be achieved. The report also sets out scope to deliver more hedgerows or tree lines within future proposals in order to meet at least a minimum of 10% net gain with potential for further significant gain of linear units.

Integrating urban drainage into the landscape can also provide destinations for social activities and interaction.

There is abundant open space to accommodate required play spaces (likely to be a NEAP and LEAP for a site of this size).

*Locally produced food*

A Vision Document will be submitted in parallel (as part of) these representations. The masterplan within the document shows allotments proposed to the west of the residential area within the site. Food production, albeit small scale and recreational, would be able to occur within the site.

Further demonstration of the land at Pitt Vale being capable of evidencing compliance with the 20-minute neighbourhood concepts is provided throughout the Vision Document and we invite the Council to take this into consideration before proceeding to the next stage of the current scheduled plan review process.

What modifications are necessary to make this policy legally compliant or sound?

The emphasis on the Climate Emergency and the 20-minute neighbourhood is, in principle, fully supported by Vistry Partnerships. However, the 20-minute neighbourhood is being undermined when it appears not to have been considered as part of the site selection process evidence.

The site selection process should take into account the 20-minute neighbourhood concept otherwise achieving the content of draft Policy T1 is likely to be undermined in practice.

What is your suggested wording or text for the policy:

Vistry Partnerships has no specific changes to the wording of the policy but rather seek to ensure the content of the Policy is entrenched throughout the Local Plan and its supporting evidence base.

**Policy T2 – Parking for New Developments**

Do you consider the supporting text and policy are

Legally Compliant	<b>Yes</b>	No
Sound	<b>Yes</b>	No
Complies with the DtC	<b>Yes</b>	No

Give details to support your answer above:

The supporting text for this policy sets out that there is a focus on development within sustainable settlements and it may therefore be possible to see a reduction in the number of car parking spaces provided per dwelling. Paragraph 6.26 also notes that developers will need to justify why they are planning for the number of parking standards proposed.

Vistry Partnerships support the premise of this, but it is important new developments are still designed to accommodate satisfactory levels of parking to ensure safety and attractiveness within developments and reduce the potential for unallocated on-street parking. Both of which would detract from placemaking objectives.

What modifications are necessary to make this policy legally compliant or sound?

Whilst Vistry Partnerships appreciate the policy is based on new parking standards, it is recommended some degree of flexibility is built into the policy. This is required to ensure flexibility in the application of the standard to provide a balance between movement, necessity and placemaking.

What is your suggested wording or text for the policy:

See above suggestion.

## Homes for All

### H1 – Housing Provision

Do you consider the supporting text and policy are

Legally Compliant      Yes      **No**

Sound                      Yes      **No**

Complies with the DtC    Yes      **No**

Give details to support your answer above:

Vistry Partnerships have several concerns regarding Policy H1 which go to the heart of the Plan and its soundness. The concerns include: the Plan Period, the overall housing need identified, affordable housing, unmet needs, the lack of buffer, and the identified housing supply.

#### Plan Period

Policy H1 sets out the Plan Period as 2020-2040.

A Housing Topic Paper (HTP) has been prepared and forms part of the evidence base. This provides additional clarity on the Plan Period and explains the Plan has been extended until 2040 to allow 15 years from adoption and that the start date is 2020. Paragraph 2.4 of the HTP states the Plan Period start date is also set at 2020 “...to allow some of the Council’s recent good performance in terms of housing completions to be taken into account, as there is no specific provision in the NPPF or Planning Practice Guidance for past over-supply to be taken into account and this would otherwise be lost”.

Vistry Partnerships raise a concern with the orchestrated start date simply to accommodate previous higher levels of housing completions. NPPF paragraph 77 indicates that; ‘National planning guidance provides further information on calculating the housing land supply, including the circumstances in which past shortfalls or over-supply can be addressed’. However, the Planning Practice Guidance (PPG) was never amended in this way. Indeed, this fact has been observed in recent Section 78 Inquiries, notably in Wokingham Borough. The Inspector for Appeal Ref. APP/X0360/W/24/3340006 (Swallowfield) said in paragraph 37 of their Decision Letter (17 July 2024);

*‘Paragraph 77 of the Framework indicates that past over-supply may be a relevant factor in calculating housing land supply, but notwithstanding what is said in that paragraph no methodology has yet been provided in national planning guidance for doing so.’*

Additionally, the revised NPPF (recently subject to consultation) proposes to remove any potential for offsetting over-supply, both in Plan-making and in the calculation of a rolling 5YHLS.

There is therefore no basis for artificially bolstering supply as the Council seeks to do by commencing the Plan period in 2020. Indeed, whilst the Council can point to higher levels of housing completions in recent years, this was preceded by years of under-completion, a matter which the justification presented in the Topic Paper overlooks. In any case, the operation of the Standard Method (as existing and as proposed in the recent Government consultation) indirectly accounts for previous over/under-supply through the affordability ratio (PPG 011 Reference ID: 2a-011-20190220).

Vistry Partnerships considers the Plan period should commence with the base date from which the housing requirement monitoring period is calculated, namely 2024/25. The Standard Method utilises population projections from the relevant base year (in this case, from 2024), alongside housing affordability data (in this case, the median affordability ratio for 2023 which was published in 2024). This is indeed necessary when it is remembered that including several years of extant housing completions within the Plan period would result in the inclusion of completions that will have (through the mechanics of the Standard Method) also fed into the assessment of local housing need, which the balance of the Period seeks to address. Put more simply, the Council's approach blurs the inputs into and outputs derived from the Standard Method calculation, thereby conflating housing needs with supply.

The Council's proposed approach to the Plan Period is particularly surprising, considering that the most recent evidence-based housing needs assessment is presented in the SHMA Final Report (July 2024). This report examines how housing needs (including affordable and specialist needs and housing mix) have changed since the previous 2020 iteration of the SHMA, with much of the Final Report assessing circumstances in 2024 (as a fixed point in time) or projecting forward from this base year. It seems likely that the Council would have aligned the Plan-period with the 2024 SHMA, were it not for the perceived opportunity to artificially claim 'previous over-supply' (as set out in the Topic Paper).

Overall, this approach is not positively prepared, forward looking as Local Plans should be or consistent with national policy. The Plan period should be rebased from 2024. The Inspector examining the North Norfolk Local Plan raised a similar concern in regards to the starting point of the plan and noted the following in the Inspector's post hearing note:

*"...Turning to the base date of the plan, this should correspond to the date from which the housing needs of the district are quantified. As set out in paragraph 12 below, this should be April 2024. The plan period should therefore be 2024-2040."*

Vistry Partnership considers that any shortfall in delivery measured against the SHMA (2024) assessed need, accumulated up to the base-year of the plan period, should be dealt with within the first five years of the new plan period. One obvious way to achieve this will be to pursue higher growth beyond the current SM minimum target – which in turn will provide for additional affordable housing needs to be met by the new plan.

This is an approach set out within the PPG (Paragraph: 031 Reference ID: 68-031-20190722) and endorsed at appeal. It would also be consistent with the views of the Inspector undertaking the examination of the Elmbridge Local Plan; wherein at Paragraph 26 and 29 of the Inspector's Interim Findings Letter, dated 11 September 2024, the Inspector concluded that:

*'...the strategy as adopted would be unsound as it would also not be effective in addressing the acute affordable housing need of the borough, including the backlog...*

*and*

*'Given the acute position regarding current affordable housing need, the scale of the backlog and the ever-worsening position regarding affordability ratios within Elmbridge, it is my view that the Council should seek to address the backlog during the plan period' (emphasis added).*

Whilst the situation in Elmbridge is more acute than within Winchester District, recent unmet affordable housing need has been rapidly worsening and the District's market affordability ratios also stand well above the national average at 12.05 for lower quartile earnings to house price. Overall, there are clear market signals indicating a worsening trend in affordability. By any measure of affordability, this is an Authority in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

#### Overall Approach to Housing Need

Draft Policy H1 identifies a housing requirement of 'about' 15,115 dwellings (or 15,465 if including the 350 homes expected to be delivered in the National Park). This is based on a Standard Method figure of 13,565 dwellings (678.25 x 20-year plan period). The difference between the Standard Method figure and the identified requirement (i.e. 1,550 + 350 homes to be provided for in the New Forest NPA, or 1,900 homes overall) is understood to be apportioned to address unmet housing needs arising in neighbouring Local Authorities.

Paragraph 9.21 of the Draft Local Plan confirms that no buffer has been included to allow for non-delivery.

Vistry Partnerships agrees the Standard Method is an appropriate starting point to identifying the current *minimum* level of housing that must be planned for in accordance with NPPF paragraph 61. However, the Council should also be exploring whether the housing requirement should be higher (per paragraph 67) in response to their being a higher identified housing need. For context, the housing requirement within the draft Plan is 15,115 whereas the requirement through the new revised Standard Method would be 21,980 (assuming a 20 year plan period). Vistry Partnerships notes the Housing Topic Paper provides some limited commentary on this point, but is essentially dismissive of the possibility that an uplift might be justified in the case of this Local Plan. In this respect, Policy H1 (and the Plan overall) is not positively prepared. The delivery of affordable housing and the scale of unmet needs are salient considerations in this regard, as noted below.

#### Affordability and Affordable Homes

Vistry Partnerships are aware there are historic failings to deliver sufficient affordable homes, and this trend has been worsening over recent years.

The latest ONS publication (2023) indicates that the median (workplace-based) house price affordability ratio for the District was 13.32, having risen from 9.93 in 2013, and 5.62 in 1997. For comparison, England's latest (2023) ratio stands at 8.18. A similar pattern is reflected in lower quartile affordability ratios (the entry level for home ownership), with the 2023 figure for Winchester District being 12.05 compared to 7.25 across England as a whole. Indeed, the comparative unaffordability of housing within the District is certainly acknowledged at Figure 2.3 of the SHMA 2024 Update.

The Forward to the draft Local Plan states that the Council face a “*challenge of affordability*”, adding that it is “*harder for all ages, and especially younger people, to find a suitable house they can afford*”.

The Regulation 19 Local Plan sets out that “this plan takes a new approach to affordable housing targets – replacing an ‘expectation’ that was too often missed, with a minimum requirement that developers must achieve”.

Winchester City Council have undertaken two Market and Housing Need Assessments (SHMAs) in the past five years (2020 and update in 2024). The 2024 SHMA Update confirms there is an increased affordable housing need from that identified in the 2020 SHMA. The newly identified need is 495 dwellings per annum between 2019/20 and 2039/40.

It is pertinent to consider the quantum of affordable housing previously delivered. Table 1 sets out the delivery of affordable housing since 2011/12 when LPP1 was adopted.

**Table 1.** Affordable Housing annual requirement and completions (data taken from Tetlow King Affordable Housing Statement – appended to representations)

Monitoring Period	Requirement from	Requirement	Affordable Housing Completions (gross)	Affordable Housing Completions (Net Right to Buy)
2011 / 2012			142	135
2012 / 2013	2012 SHMA	519	62	43
2013 / 2014		519	115	89
2014 / 2015		519	134	108
2015 / 2016		519	63	38
2016 / 2017		519	86	48
2017 / 2018		519	163	148
2018 / 2019		519	278	258
2019 / 2020	2020 SHMA	343	206	192
2020 / 2021		343	118	103
2021 / 2022		343	528	502
2022 / 2023		343	383	374
2023 / 2024		343	482	502



<b>Sub-Total</b>		<b>5,350</b>	<b>2,760</b>	<b>2,540</b>
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An Affordable Housing Statement is submitted in support of this response and notes that the reduction of annual requirement from 519 to 343 is due to the method of calculation rather than a simple reduction in demand for affordable housing.

A total gross 2,760 affordable homes have been completed since LPP1 was adopted which equates to 33% of all completion data since 2011/12. Importantly, the gross figure in Table 1 does not take into account any losses from the affordable housing stock through demolitions or Right to Buy sales and these are reflected in the net figures. The net affordable housing stock provides only 30% of total housing completions.

Table 2 below demonstrates an acute shortfall of provision of affordable housing since LPP1 was adopted, shown with completions against the requirements set out in the 2012 and 2020 SHMA.

**Table 2.** Shortfall of provision of affordable housing

Monitoring Period	Requirement	Completions (Net to RtB)	Shortfall
2012/13 – 2016/17	2,595 (519 x 5)	326	-2,269
2019/20 – 2023/24	1,715 (343 x 5)	1,673	-42

This demonstrates a shortfall of -2,311.

There is then a strong case for an uplift well over the minimum Standard Method figure to promote and make an inroad to redressing the issue of unmet affordable housing needs and the general market and rental affordability in the District.

Furthermore, The SHMA 2024 document identifies a need for 495 affordable homes annually (368 dpa affordable/rented and up to 127 dpa affordable home ownership). This represents 65.5% of the overall annualised housing requirement (755 dpa) identified for the Plan area (i.e. excluding the National Park). This level of affordable housing need will clearly not be delivered, noting that Policy H6 proposes an affordable housing tariff of between 25% and 40% for new housing developments, depending on a site's location and constraints. This points to the need for the Council to increase the minimum housing requirement further, and importantly to allocate additional market-led sites to unlock additional affordable housing.

The Housing Topic Paper (from paragraphs 3.19 to 3.22) engages with this matter only to a minimal extent, arguing that the Council has aspirations to build new Council houses and claiming there has been a good track record of affordable housing delivery within the District. Whilst Vistry Partnerships commends this aspiration and any efforts to bring forward affordable homes, it cannot be said that net affordable housing completions in the District have addressed previous assessments of need (as set in the 2012 and 2020 SHMA reports) and summarised in Table 1 and 2 above. Indeed, the Council's monitoring information/completion data suggests that, once losses from redevelopment or 'right to buy' purchases are accounted for, just 2,540 new affordable homes (net) have been built within the District since 2011/12. There has therefore been an acute affordable housing delivery

shortfall against objectively assessed needs, dating back to 2011/12. It is evident that this shortfall will only continue to grow based on the affordable housing need as a percentage against the current housing requirement when considered against the policy requirement for affordable housing in the draft Local Plan.

#### Duty to Co-operate / Unmet Need

Paragraph 35 of the NPPF makes it clear that Local Plans will be found to be 'positively prepared' where they meet the objectively assessed need of the area and where unmet need from neighbouring areas is accommodated (if practical to do so). This is supported by Paragraphs 24 – 27 of the NPPF which confirm that cross-boundary matters that cannot be met wholly within a particular plan area should be considered by strategic policy making authorities, with relevant matters addressed in their Local Plans.

The draft Local Plan acknowledges in paragraph 9.15 there are several authorities within Southern Hampshire that are unable to meet their own housing requirements in full and that the Partnership for South Hampshire (PfSH) have developed a Spatial Position Statement to accommodate this.

The Spatial Position Statement sets out a two-tier approach to addressing unmet housing needs (which is also included in the draft Local Plan paragraphs 9.16-9.17):

- 1) Authorities (including Winchester) should exceed their Standard Method requirement to provide an 'unmet needs allowance'. This is identified as a short to medium term timeframe.
- 2) 'Broad Areas of Search for Growth' have been identified throughout South Hampshire which future Local Plans would assess the impact these areas could have on meeting unmet housing need. Seven areas of search have been identified, including 'East of Botley' in Winchester. Further work needs to be undertaken to appropriately consider their allocations.

Table H2 within the draft Local Plan includes a figure of 1,900 to cover the assumed unmet need.

The PfSh Spatial Position Statement 2023 sets out an overall shortfall of 11,771 dwellings with the 'broad areas of search' estimated to have a total capacity of c. 9,700 dwellings. Whilst Vistry Partnerships support the ongoing work by PfSH and their introduction of the two-tier approach, the heavy reliance on future 'broad areas of growth' simply pushes the unmet need to future Plan Periods of the relevant authorities. The effect of deferring the meeting of unmet needs is simply that these needs increase in scale and consequential severity.

The Housing Topic Paper confirms that both Portsmouth and Havant Local Authorities have formally requested (under the duty to co-operate) that Winchester help meet their unmet need. With Portsmouth highlighting unmet need of 3,577 homes and Havant highlighting 4,300 homes. Together this provides an unmet need of 7,877 dwellings.

These figures are far higher than the shortfalls identified in Table 1 of the 2023 PfSH Position Statement, which highlights the under-reporting of the scale of unmet needs in that document (even when excluding the impacts of the proposed revised Standard Method). Moreover, the Statement of Common Ground provided in relation to Havant is particularly concerning in that it makes the following allegation, which suggests a failure of the Duty-to-cooperate test;

*‘...there has been no engagement between the Regulation 18 and Regulation 19 stages from Winchester City Council in order to address the matters raised in earlier representations or the letter of 5th March 2024’*

Given the above, the apportionment of 1,550 / 1,900 homes to address unmet needs appears inadequate and not clearly justified. Indeed, the Housing Topic Paper (in paragraph 4.52) suggests that the 1,900 figure is simply based on an assessment of available development capacity (i.e., through the SHELAA and Site Selection Paper). Indeed, where ‘Levels of Growth’ reasonable alternatives are considered on pages 588 to 595 of the *Integrated Impact Assessment Report* (July 2024), the Council essentially relied upon already shortlisted HELAA sites and the identified preferences of Parish Councils.

As such, the potential to ‘cast the net wider’ to identify additional sites to address a larger share of unmet needs does not appear to have been considered. Indeed, there is no consideration of an alternative option where the Plan accommodates (for example) 3,000 to 5,000 additional dwellings to address a greater share of the unmet needs arising within the PFSH area. This is disappointing given that the Plan area is relatively unconstrained (i.e. absent of areas constrained by nutrient neutrality or M27/A27 corridor capacity issues, landscape designations, etc.) compared to other Local Authorities within the south of Hampshire. This suggests that further sustainable opportunities for meeting needs could be found.

Furthermore, there is no evidence that WCC have considered the impact of the revised Standard Method on housing need across Southern Hampshire. The revised Standard Method will increase the housing requirement across Southern Hampshire by a huge amount. Whilst Winchester are seeking to push forward with the submission of their Local Plan in order to avoid the necessity to accommodate for higher numbers, other authorities will be required to accommodate for the revised figures. It is WCC’s duty to consider this impact and whether they should provide a higher unmet needs allowance. Failure to consider this conflicts with NPPF paragraph 26 which requires “on-going joint working.”

The Integrated Impact Assessment also demonstrates that there has been no consideration of meeting unmet needs with paragraph 2.33 noting *“At the time of preparing the Strategic Issues and Priorities document and Regulation 18 Local Plan, the options considered related to meeting the needs of Winchester District, not the unmet needs of neighbouring authorities.”* Whilst the IIA does consider options with higher levels of housing, it is not clear whether this incorporates unmet need or rather different spatial strategies. No specific test was undertaken to incorporate a higher level of unmet need.

It is clear that substantial work still needs to be undertaken to ascertain how many homes each PFSH local authority is required to accommodate. This lack of work undermines the WCC draft Local Plan and spatial strategy as the figure of 1,900 would not make a meaningful contribution to this and the justification for arriving at this figure is weak. Overall, the approach to unmet needs (as a component of the overall housing requirement) is not positively prepared.

Buffer

The Housing Topic Paper considers whether a buffer is required within their housing requirement to allow for under provision and determines the NPPF does not require a buffer for the purpose of Plan Making. Vistry Partnerships agree that the December 2023 NPPF does not require a buffer to be applied. However, the proposed strategy for housing supply includes 4,770 homes comprising windfalls (1,725 / 1,075) and new allocations through the draft Local Plan. For both sources of supply, there must necessarily be some potential for uncertainty, overestimation of capacity, and delay, as not all sites come forward as expected. On the basis of robustness and demonstrating an *effective* supply, the Council should still seek to include a buffer of at least 5% to account for a reduced windfall provision or over-estimation of development capacity of sites. In addition, 6,780 dwellings already benefit from planning permission and it is undoubtedly unrealistic to assume that there will be no lapses within this provision. The inclusion of a buffer would accommodate any losses due to lapsed permissions within this provision.

Furthermore, it is highly pertinent that the draft NPPF 2024 seeks to reintroduce a buffer when assessing five year housing land supply (paragraph 76). Whilst not specifically applying to Local Plan preparation, it sensibly re-emphasises the importance of a buffer in safeguarding against lapsed permissions or over-estimation of capacity.

Vistry Partnerships therefore reiterate that at least a 5% buffer be added to the standard method for the reasons set out above. This would require an additional 678 dwellings and additional sites should be allocated to accommodate for this, for example the land at Pitt Vale.

To be positively prepared Vistry Partnerships recommend that a buffer is introduced to consider lapsed housing or over capacity of allocated sites.

#### Previous Local Plan Allocations Carried Forwards

Table H2 of the Draft Local Plan sets out Winchester's Housing Provision, and how they are to accommodate the required 15,465 homes.

As with the previous Regulation 18 version of the Plan the strategy is strongly focussed on sites which already benefit from planning permission but which are not yet built out. This source of identified supply provides some 6,780 homes. In addition, a number of formerly allocated sites through LPP1 and LPP2, which have still not come forward for development (emphasising the position on necessity of including a buffer within the housing requirement), are to be allocated again. Vistry Partnerships are concerned that, given some of the sites have been allocated since 2013 and are yet to come forward, it may not be realistic for WCC to continue relying on them as brought forward site allocations. Indeed, Paragraph 126 of the NPPF confirms "*Where the local authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan: a) it should, as part of the plan updates, reallocate the land for a more deliverable use that can help to address identified need (or, if appropriate, deallocate a site which is undeveloped); and b) in the interim, prior to updating the plan, applications for alternative use on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.*"

This is underpinned by the definition of deliverable in Annex 2 to the framework which confirms “...to be considered deliverable, site or housing should, *inter alia*, be achievable with a realistic prospect that housing will be delivered on the site within five years.”

Certainly, doubt is raised over the appropriateness of these allocations and the deliverability of the sites.

For example, Policy CC1 ‘Clayfield Park’ (48 homes). which was allocated in LPP1 and has failed to come forward for development. It is currently occupied for commercial use, and it is unclear when it might be available for redevelopment. Part of the site is a former brickworks, and the extent to which the land is contaminated (and requires remediation) is unclear. Despite these ambiguities, the Draft Local Plan and associated evidence base do not present any new information to explain how and when these constraints can be overcome.

Conversely, at Bishops Waltham, Policy BW1 proposes to carry forward an allocation at The Vineyard / Tangier Lane. This site benefits from planning permission and is being built out, and it is forecast (in the AMR) to be completed by 2024 / 2025. With reference to our previous comments, Vistry Partnerships contends that the plan period should commence in 2025. Hence, this site would not contribute to the identified supply within an updated Plan-period of 2025 to 2040.

Overall, 1,055 homes identified within the draft Local Plan as a source of supply were previously allocated in LPP2. Likewise, North Whiteley, Barton Farm and West of Waterlooville were allocated in LPP1 and are expected to provide some 6,700 homes in the new Local Plan-period. Yet, following the allocation of these strategic sites in March 2013, only around 2,800 homes have been delivered. This again highlights the need for a buffer and additional allocations to improve the consistency of housing supply going forward.

#### *Barton Farm – correction required*

Barton Farm was allocated for 2,000 homes within the LPP1. The site remains an allocation for 2,000 homes within the Regulation 19 Local Plan. However, the supporting text for the policy states that as of April 2023, there are 1,541 dwellings remaining to be developed which means 459 dwellings have already been completed and should not form part of the allocation. This allocation should be changed to 1,541 and an additional 459 homes should be provided for through new site allocations.

#### Windfall Allowance

At Table H2, the Draft Local Plan anticipates a windfall supply of 1,875 homes over the envisaged 20-year Plan-period. This equates to 93.75 dpa. This figure rises for the 15-year post-adoption plan-period to 125 dpa.

Vistry Partnerships do not believe there is compelling evidence to justify the identified contribution from windfall developments, as per the NPPF paragraph 72 test. The Windfall Assessment Report (2021), which forms part of the evidence base, identifies a windfall supply of 115 dpa over a 15-year period (2023/24 to 2037/38). The report adds (at paragraph 6.1.6) that;

*“It is not normal to apply the windfall estimate to the early years of the Plan period, as dwellings completed in this period will already have consent and so are counted as ‘commitments’”.*

In the first instance, it is not clear why the Draft Local Plan should identify a greater annualised windfall supply than appears to be identified in the primary evidence base report for this matter. More substantively, the analysis in the Windfall Assessment Report appears to overestimate the likely achievable level of supply from this source.

For example, part of the anticipated source of windfall supply includes ‘conversions’, with it being stated at paragraph 5.63 of the report that:

*“Completions from conversions have resulted largely from changes to permitted development rights and are expected to continue provided that there is no change in current permitted development rights relating to the conversion of agricultural buildings to residential.”*

Yet, the Assessment does not provide any details regarding the availability of existing agricultural buildings for future conversion. This is a concern, as it must surely stand to reason that there is not an inexhaustible supply of barns / agricultural buildings that can be converted through permitted development rights.

A similar point is raised in respect of the future supply of homes that might be achieved through the redevelopment / conversion of sites in commercial or leisure use. The Assessment is not supported (for example) by an analysis of an urban capacity. Instead, the report makes generalised assumptions about the impact of Covid and other trends in the commercial property market that may or may not result in the ‘loss’ of commercial floorspace to residential. However, the report does not detail how these influences may affect the Winchester District specifically.

In addition, it is relevant that the Plan at Table H3 identifies completions achieved in 2019 to 2021 from development of under 10 dwellings have been identified as a source of supply, which equates to 388 homes. Noting our previous comments about the commencement of the Plan-period, Vistry Partnerships do not consider it appropriate to include such completions.

As a separate point, the identified supply of small housing sites (at Table H3 of the Plan) includes planning permissions granted by April 2021 (for developments of less than 10 dwellings). It is not clear if an appropriate lapse rate has been applied to this figure, to account for the fact that not all planning permissions will be successfully implemented.

Accordingly, Vistry Partnerships do not agree that proposed approach to windfall supply is appropriate, nor is it sufficient to satisfy the test set out at NPPF paragraph 72. The reliance on the identified windfall supply is therefore not consistent with national policy, nor is it likely to be effective.

#### Lack of A Detailed Trajectory

A detailed housing trajectory for the Plan is conspicuous by its absence from the Plan and its evidence base. This is most surprising, given the Plan has gone to consultation under Regulation 19. With this information lacking, there is no clear position on overall capacity and prospective completion rates. In

turn, there is no way to assess whether there is sufficient supply to address the proposed housing requirement and no means to test this matter at Examination.

#### Consultation on Changes to the NPPF

The Ministry of Housing, Communities and Local Government ('MHCLG') published proposed changes to the NPPF on 30 July 2024, which are intended to implement the Government's manifesto commitments to increase housing supply. The proposed changes to the NPPF were subject to consultation that ran to 24 September 2024.

Whilst the consultation proposed changes at this stage, the revisions include significant changes that are likely to be pertinent to Winchester City Council in the immediate future, including revisions to the Standard Method.

For the purposes of plan-making, the proposed amended Paragraph 226 is clear that the policies in the new NPPF (once published) would apply from the publication date plus one month, unless (*inter alia*) a draft Local Plan is submitted for Examination under Regulation 22 on or before the publication date plus one month.

In this context, Vistry Partnerships are concerned that the Council has made a political choice to rush through the plan-making process, with the intention of submitting the plan for Examination under Regulation 22 in advance of the publication of the new NPPF. Vistry Partnerships' concern is that this is being undertaken to avoid the need to plan for the revised Standard Method figure which is significantly higher than the Housing Requirement set out in the draft plan.

In this context, Paragraph 227 of the NPPF Consultation Document is clear that;

*'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<sup>66</sup> 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 proposed Housing Requirement in the draft Local Plan ranges between 666 – 707 dpa over the proposed Plan Period (13,565 total, over the 20-year plan period). This is significantly lower than the District's proposed new Standard Method figure of 1,099 dpa. In other words, if the revised Standard Method figure was used for the Plan Period, it would equate to a housing requirement of 17,584 (based on the Plan commencing in 2024 as recommended) without taking account of any unmet need across the wider south Hampshire region. The requirement within the Reg 19 version of the draft Local Plan therefore is for over 4,000 less homes.

Vistry Partnerships' view is that the Council's current approach is not *positively prepared*, nor *effective* or *justified* on its own terms, in its current formulation.

Vistry Partnerships' view is that the Council should seek to future-proof this draft Local Plan by taking the opportunity to do this now, in advance of a requirement to do so immediately following the adoption of this draft plan. Doing so would assist in '*...making sure that the right kind of homes are delivered through our planning system as quickly as possible*'.

The SoS published a Written Ministerial Statement ('WMS') on 30 July 2024 alongside the letter to Councils. In the WMS, the SoS is clear that the proposed amendments to the NPPF represent a clear and purposeful direction of travel, toward ensuring that there are a sufficient number of homes being built, and that they are being delivered in sustainable locations.

In this context, notwithstanding its current status as a consultation document, it is clear the NPPF is set to be updated meaningfully and purposefully to achieve these aims and that such amendments represent the '*First Step of a Bigger Plan*' to bring forth the '*...decade of renewal that the country so desperately needs*'. As the Secretary of State declares; '*There is no time to waste. It is time to get on with building 1.5 million homes*' (emphasis added).

Our representations demonstrate that Land at Pitt Vale is capable of assisting in delivering the desperately needed housing and affordable homes in a sustainable and suitable location. The draft Local Plan should consider allocating the site accordingly to assist in meeting assessed general and affordable housing needs rather than awaiting for the next plan review.

#### [What modifications are necessary to make this policy legally compliant or sound?](#)

Vistry Partnerships questions whether it is possible to render Policy H1 sound, given the extent of concerns identified. However, in summary the following modifications would be necessary:

##### Plan Period

Vistry Partnership firmly contends the draft Local Plan period should be re-based to the 2024/2025 year, when the plan is expected to be adopted.

##### Affordability

To meet more of the District's affordable housing needs (past unmet and future arising) Vistry Partnerships advocate the Council should include further specific site allocations for otherwise suitable, sustainably located sites – specifically at and on the edges of the existing main settlements. Such sites are often in the most sustainable locations and best placed to deliver comparably higher levels of affordable housing toward meeting more of the District's overall affordable housing needs

##### Duty to Co-operate

Further justification and evidence is required from Winchester City Council to ensure the draft Local Plan is positively prepared. It is strongly recommended that WCC provide a proper and robust justification to underpin the proposed size of the buffer, especially in light of the extent of unmet need within PfSH. It is fundamental for WCC to demonstrate collaborative working with neighbouring authorities and that they are seeking to meet an appropriate quantum of unmet need assumed through the PfSH Statement of Common Ground. Without this, WCC are at serious risk of failing the Duty to Cooperate requirements.

##### Buffer

Vistry Partnerships maintain that at least a 5% buffer be added to the minimum standard method. This would require an additional 678 dwellings and additional sites should be allocated to accommodate for this.



Windfall

Greater justification should be provided for the windfall assumptions to satisfy the compelling evidence test. In addition, the windfall completions in the past 3 years should be removed from the housing supply as provided for through site allocations.

Incorporate review mechanism for Local Plan review

In addition, if the Council intends to proceed to Examination (under Regulation 22) with the Draft Plan in its current form, a modification must be included to trigger an immediate review of the Plan following adoption. This must include clear timelines and milestones, and stringent penalties must be introduced if the Council fails to progress to an appropriate plan within a reasonable timescale.

Vistry Partnerships' view is that a 'review mechanism' should be introduced into policy, which sets out clear dates for the preparation and completion of a new local plan, and the consequences should those timescales not be met. Bedford Borough Council's Local Plan 2030 provides a good example of such a review mechanism, which Vistry Partnerships would advocate is replicated within the Winchester City Council.

In the Bedford Local Plan 2030 example, 'Policy 1 – Reviewing the Local Plan 2030' provides that:

*'The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework 2019'.*

This example review policy was included within the Bedford Local Plan 2030 due to similar circumstances, wherein the NPPF (2019) was adopted during the plan-making process, which introduced the Standard Method. The Winchester City Council Local Plan should be amended to introduce a similar review mechanism to ensure the new NPPF, and the updated standard method, is taken into account swiftly.

What is your suggested wording or text for the policy:

The issues raised go to the heart of the Plan and its soundness and cannot be resolved by simply including amended wording. Instead, the Plan's strategic approach to identifying and addressing the housing requirement with suitable supply should be reconsidered. This is essential for the Plan to be consistent with national planning policies, positively prepared, justified and effective to ensure it is sound and justified.

**H2 – Housing Phasing and Supply**

Do you consider the supporting text and policy are

Legally Compliant      Yes      No

Sound **Yes** **No**

Complies with the DtC **Yes** **No**

Give details to support your answer above:

Draft Policy H2 introduces the notion of phased development, whereby the priority is on the development of previously developed land and holding back the majority of greenfield allocated sites until the later parts of the plan period. Furthermore, the Policy specifies that sites will not be permitted to come forward ahead of their specified phasing unless they are required to contribute to the District's Five Year Housing Land Supply.

This approach is questionable for a number of reasons.

Firstly, this is contrary to the paragraph 60 of the NPPF which states:

*"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay".*

The NPPF is clear that a sufficient amount and variety of land can come forward where it is needed and a corollary of this is that where sites are needed they should be delivered without unnecessary delay. However, the draft Plan seeks to hold back a number of sites until later in the Plan period, for no justifiable reason other than the intention to prioritise brownfield development. Given that some greenfield sites have been allocated, it makes no sense to hold back the development of those allocated sites. Indeed, draft Policy H2 lists the sites which will be held back until 2030 equating to 795 dwellings.

Whilst the NPPF supports the redevelopment of previously developed land, the Framework does not refer to a brownfield-first approach. Therefore, the approach proposed in the Draft Local Plan has no apparent basis in national planning policies. Noting this and taking account of the conflict with NPPF paragraph 60, the Council's approach fails as a matter of principle.

Moreover, it is unclear why allocations on previously developed land should be expected to come forward more easily and quickly than those on greenfield sites. Indeed, the approach appears counterintuitive, noting that brownfield sites are often already occupied for a non-residential existing use or may otherwise be subject to complexities, constraints, such as contamination and viability concerns. Indeed, as documented in our representation on Policy H1, the rolled-over allocations include previously developed sites that have been allocated for over a decade but have not come forward for residential redevelopment.

Secondly, it is likely that WCC will be dependent on greenfield sites. Lichfield's 'Start to Finish' document (3<sup>rd</sup> edition) provides the principal industry-based research into the factors which affect housing delivery. The research paper indicates that several issues arise from reliance upon large-scale, brownfield development sites.

The research indicates lead-in times for development proposals comprising greater than 500 units are likely to be considerably lengthier than those for proposals below the 500-unit threshold. Average lead-in times for sites above the threshold were 4.3-years, whereas for smaller sites the average was just 2-years.

The research further indicates that actual build-out rates were considerably lower on brownfield development sites than their greenfield counterparts. Indeed, the delivery rate for homes on greenfield sites is some 34% higher on average. Therefore, the reliance on brownfield sites in the first half of the Plan-period will likely cause under-delivery. Hence, the approach undermines the Plan's effectiveness as a whole.

As noted, Policy H2 would allow a deviation from the proposed phased approach if this is required to ensure that a 5YHLS can be maintained. However, this then implies that the Council anticipates that the brownfield-first approach will not effectively sustain a 5YHLS. Indeed, in seeking to artificially restrict the development of greenfield sites (unless the 5YHLS position is different), the policy tacitly invites Section 78 appeals and a 'planning-by-appeal' approach.

Overall, Vistry Partnerships considers the brownfield-first phased approach unnecessary, unjustified, ineffective, and inconsistent with national planning policies. Indeed, it is nonsensical that the Council retains this proposal (as carried over from the last Regulation 18 Consultation) in the full knowledge of the new Government's much stronger emphasis on housing delivery, as set out in the recent consultation on a revised NPPF and Standard Method, and reinforced by the Written Ministerial Statement (July 2024).

[What modifications are necessary to make this policy legally compliant or sound?](#)

The proposal to restrict the delivery of greenfield sites is contrary to national planning policy is not positive and likely to be ineffective. The concept should be removed from the policy wording specifically and the Plan as a whole.

[What is your suggested wording or text for the policy:](#)

As above – the strategy for this Policy should be removed in its entirety.

### **Policy H3 – Spatial Housing Distribution**

[Do you consider the supporting text and policy are](#)

Legally Compliant      Yes      **No**

Sound                      Yes      **No**

Complies with the DtC    Yes      **No**

[Give details to support your answer above:](#)

Vistry Partnerships have raised a number of concerns about the spatial housing strategy against Policy SP2 (Spatial Strategy and Development Principles) and H1. Please see those comments which are applicable here.

### What modifications are necessary to make this policy legally compliant or sound?

A number of concerns have been raised regarding the plan period, reliance on previously allocated sites, lack of buffer, unmet need/duty to cooperate, NPPF transition, affordability and affordable housing and windfall allowance. The conclusions reached demonstrate that the District requires additional sites to be allocated in order to provide for sufficient housing. These representations have also made the argument for additional houses to be allocated at Winchester – including specifically the land at Pitt Vale.

#### **Land at Pitt Vale**

Land at Pitt Vale consists of approximately 23.7 hectares of undeveloped land on the south western edge of Winchester on the Romsey Road, at its junction with the A3090.

The site is of open character and currently in use for agricultural purposes, mainly comprising managed grassland. To the immediate east of the site is Pitt Manor (a development of 200 homes) and the Pitt Manor Park and Ride.

The sites topography is relatively flat at the southern section immediately adjacent to Romsey Road, with the land then sloping steadily upwards towards the north. At this higher point there are views across the town and towards open countryside beyond.

These representations confirm the suitability, availability and achievability of the site, and further propose it is allocated within the draft Local Plan on the basis it will provide market and affordable homes which would go some way in supporting Winchester's housing needs directly adjacent to the existing urban settlement, support Biodiversity Net Gain and provide high quality, beautifully designed, sustainable homes which reflect the surrounding context. Development of the site would embrace the 20-minute neighbourhood principles in alignment with the emphasis throughout the draft Local Plan. The site itself is free from constraints which would preclude development and can support a development capacity of approximately 350 homes together with landscaping, open space and a community centre.

Furthermore, the site is available now and development could commence immediately, compared to other sites within Winchester town such as the Sir John Moore Barracks.

Importantly, the site is well-located in sustainability terms with Winchester Town only 3.2km to the north east from the central part of the site, which can be reached within a 20-minute cycle. Winchester Railway Station is approximately 3.4km from the site and is located on the Southampton to London railway line. Both the Town centre and railway station are accessible by several bus services operating along Romsey Road with stops adjacent to the site. Indeed 6 buses an hour run past the site into Winchester Town centre and the Pitt Manor Park and Ride is immediately adjacent.

The site is well contained and is bound by dense vegetation along the north eastern site boundary which comprises a variety of mature trees and hedgerows. To the south west is the hamlet of Pitt.

To the west and the northwest, the site is bounded by open fields. Running along the southern boundary of the site is Romsey Road, which provides direct access to the city centre and other key

routes leading from the southern extent of the city. The South Winchester Golf Course is located south of this road.

Vistry Partnerships are proposing a residential-led sustainable community comprising:

- Up to 350 dwellings;
- A mix of dwelling sizes and types with a policy compliant provision of affordable housing;
- A community facility which could potentially include a café and flexible work/office space;
- Retention and enhancement of the existing public rights of way and permissive paths supplemented with new pedestrian and cycle links;
- A network of open spaces and play areas linked by safe and convenient pedestrian and cycle routes;
- Extensive public open space; and
- Surface water drainage works.

Key design considerations embedded within the concept masterplan scheme proposal include:

- To respect the integrity and setting of Pitt by ensuring separation between the hamlet and the main urban area of Winchester;
- To demonstrate how the site provides a sensitive extension following the traditional pattern of growth in the Town; and
- To create a new sustainable community which holds climate resilience at its heart, and which therefore incorporates the draft Part L Building Regulations and Future Homes Standards at the earliest opportunity, and which thrives on the principles of a 20-minute neighbourhood.

A Vision Document has been prepared which is submitted alongside these representations and includes our assessment of the site in its existing context; and a summary of the surveys undertaken to date which inform the illustrative masterplan. It is noted that further surveys will likely be required and will be undertaken in due course. In addition, a Biodiversity Net Gain Assessment, Baseline Landscape and Visual Appraisal and Ecological Technical Note are submitted alongside these representations.

### **Deliverability of Pitt Vale**

The NPPF requires that, to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. Land at Pitt Vale meets these requirements as follows:

- *“Available now”* – Vistry Partnerships has an established interest in the land through an agreement with a single landowner to bring the site forward for development. The site is therefore available now.
- *“Offer a suitable location for development”* – the information provided in this section of the representation and demonstrated in the supporting Vision Document (enclosed at

Appendix 2) confirms the site is suitable to create a sustainable urban extension to the City of Winchester.

- “A realistic prospect that housing will be delivered on the site within 5 years” – Vistry Partnerships is committed to bringing forward the site for development and to deliver a first phase of housing completions within five years.

Vistry Partnerships consider that the new Winchester Local Plan needs to deliver improved housing delivery rates over those achieved by the current adopted Local Plan Part 1 (LPP1). On the basis of the available evidence, including the *Start-to-Finish* report by Lichfields (3<sup>rd</sup> edition), and from other sources on lead times and delivery, the new Local Plan must combine a sustainable urban focus approach which includes greater diversity in its housing supply in locations close to the Winchester urban area. This should include medium and smaller sites of up to approximately 500 dwellings for which lead in times are shorter and delivery rates higher, as well as any major new strategic allocations with significant or complex infrastructure requirements.

As noted above, Vistry Partnerships controls the land at Pitt Vale through an agreement with a single landowner to bring the site forward for development. Single ownership is an important factor in reducing delivery times - cited as such by the Lichfield research report.

At Pitt Vale, there are no land assembly complications, no significant technical constraints to resolve or substantial up-front infrastructure costs required before new homes can be built on site. As there are no site complexities or major infrastructure costs, there is no reason to expect viability issues that could cause delay or reduce the site’s ability to meet important policy requirements such as affordable housing provision.

Furthermore, the Pitt Vale site will not rely on public resources to achieve development and will be delivered directly by a house builder with a reputation for quality and timely delivery.

### **Land at Pitt Vale and response to the Climate Emergency**

WCC declared a climate emergency in 2019. Paragraph 3.3 of the draft Local Plan sets out that the draft Local Plan is structured around the following topics:

- Carbon Neutrality and Low Carbon Infrastructure;
- High Quality Well-designed Places and Living Well;
- Transport and Active Travel;
- Biodiversity and the Natural Environment;
- The Historic Environment;
- Homes for All; and
- Creating a Vibrant Economy

Future development at Land at Pitt Vale would positively respond to all these topics, as briefly set out below.

#### *Carbon Neutrality and Low Carbon Infrastructure*

Vistry Partnerships is committed to constructing homes according to the adopted and emerging Building Regulations and Future Homes Standards. Vistry Partnerships has undertaken a review of its current and future house types to ensure their commitment to implementing renewable energy generating technologies throughout their development. As such the following will be implemented by 2025: increased insulation, wastewater heat recovery, solar panels and battery storage, air source heat pumps and EVCP. The following will also be implemented from 2030: hydrogen boilers and other smart technologies. These commitments will reduce carbon emissions by 75-80% by June 2025 ensuring they are zero carbon ready by 2025, and net zero carbon (regulated energy) by 2035.

With regards to construction at Land at Pitt Vale, Vistry Partnerships is currently exploring whether there are additional measures they can adopt to further minimise carbon whilst also ensuring the development would be viable and able to provide policy compliant levels of affordable housing.

#### *High Quality Well-designed Places and Living Well*

Land at Pitt Vale would promote high quality, beautifully-designed places to reflect the aspiration of the NPPF, adopted and emerging Winchester City Council policies. Vistry Partnerships is experienced in development within Winchester District and have a good reputation for the quality of their product; The Valley, Stanmore which was delivered on behalf of WCC is a prime example of this.

All of the proposed homes will be designed to Nationally Described Space Standards (NDSS) and materials will be reflective of the surrounding context, ensuring the protection and enhancement of existing key features.

The overall approach to placemaking and integration to the existing settlement has been a key aspect of the early masterplanning process, and the supporting Vision Document (Appendix 2) demonstrates the journey undertaken to date. It is the intention that the approach to the proposed layout and overall development design would be subject to further discussions and consultation with both the Council and local stakeholders.

#### *Sustainable Transport and Active Travel*

Land at Pitt Vale is a highly sustainable site, being located on the outskirts of Winchester Town. The Town centre can be reached within a 20-minute cycle and is within a 20-minute walk of many key services, as confirmed in the introduction to this section.

Furthermore, 6x buses an hour run past the site into Winchester centre and the Pitt Manor Park-and-Ride is immediately adjacent.

The concept of the 20-minute neighbourhood is fundamental in the context of promoting sustainable transport when undertaking site selection decisions. The ability of future residents of Land at Pitt Vale to walk to shops, the post office, schools, pharmacies, playgrounds and bus stops limits the need to use a car for daily small trips and 'errands'.

With regards to the existing infrastructure, the proposed development at Land at Pitt Vale provides opportunities to further improve the existing cycle, walking and bus routes rather than requiring new

infrastructure, setting the site apart from other draft allocations. Walking routes are available to local facilities, including Olivers Battery Road South shops with no improvements required.

The Consultation Plan document notes that “*Developments should only be planned if it is possible to link directly to public transport bus routes or train stations...*”. Land at Pitt Vale would provide residents with the opportunity to walk to the adjacent Park and Ride, or to utilise the buses running past the site into the Town centre (and to the train station within the Town centre).

#### *Biodiversity and the Natural Environment*

Land at Pitt Vale is a 23.7 ha site with a proposed approximate 8.4 ha developable area. This 15.3 ha non-developable area provides sufficient space to ensure biodiversity net gain and nutrient neutrality can be achieved. It also allows for abundant open space to be provided. The areas of open space can also act as a buffer to any surrounding features.

Ecological surveys have been undertaken at Land at Pitt Vale which conclude it is an agricultural site, therefore with limited ecological merit. The hedgerows and woodlands on the boundaries are the habitats of greatest ecological value and will be retained and protected as far as possible. Any development on the site would be supported at application stage by an ecological mitigation strategy which would set out how any foraging and commuting bats, badgers, dormice and breeding birds would be protected.

Mitigation would include a large area of open space which will be planted with suitable species, including a wildflower meadow and scattered trees. This area of open space will be suitably managed to ensure that it provides suitable foraging and commuting habitat for brown hare, dormice, hedgehog, badger and bats as well as basking opportunities for reptiles and habitat for nesting birds.

A Biodiversity Net Gain Feasibility Report has been undertaken by Ecosa and has been submitted in support of these representations. The report concludes that a gain of 172.16% of habitat units and a 9.77% gain of hedgerow units can be achieved. The report also sets out scope to deliver more hedgerows or tree lines within future proposals in order to meet at least a minimum of 10% net gain with potential for further significant gain of linear units.

#### *The Historic Environment*

There are no listed buildings within the development site itself. A Heritage Assessment has previously been commissioned for the site which sets out that, in proximity to the site there are 12 Grade II listed buildings and one listed milestone. Six of the listed buildings and the listed milestone are located along Enmill Lane, to the south west. The other 6 listed buildings are located in the former Pitt Manor Farm (on the southern side of the Romsey Road).

The setting of the listed buildings along Enmill Lane would not be changed to the extent that the significance of the buildings would be harmed. Furthermore, the character of the existing settings are not dependant on wider or expansive views of the development site as the existing trees and hedgerows in the area limit views beyond the curtilage of the houses.

The 6 listed buildings that form the former Manor Farm do not have a traditional quiet or tranquil rural location that would be compromised by the development of the application site. The wider setting of



these buildings are largely to the south east and relate more logically to the edge of the city to the east rather than the proposed development site. Notwithstanding this, the existing setting of these listed buildings has already changed because of the proximity to this built edge and the clear views of Oliver's Battery from within the settings of the listed buildings. Therefore, the development of the site to the north of the former Manor Farm would not affect the significance of the listed buildings.

There is a garden of local significance at Pitt Manor, on Kilham Road to the north east of the site. However, this is not a national designation and the garden is a sufficient distance away not to be affected by any proposals on the site.

#### *Homes for All*

Land at Pitt Vale can be an important component part of a strategy to focus development at Winchester, at a location that will implement and realise the 20-minute city principles. It will also provide a scale of site and a diversity in housing type and tenure that will meet policy requirements.

Development at Land at Pitt Vale will provide a policy compliant quantum of affordable homes including rental and intermediate homes (including products such as First Homes).

As with all Vistry Partnerships developments, the scheme would be tenure blind with affordable homes distributed throughout the site.

In line with any relevant policy, development would include accessible and adaptable homes in line with Building Regulations Part M4(2) and M4(3).

Vistry Partnerships, in being part of the wider Vistry Group, together with the recent acquisition of Countryside, allows an opportunity to draw on a range of different house types in order to suit local need and reflect the local vernacular.

As already mentioned, Land at Pitt Vale is available now and could provide the early delivery of the site within the Plan period.

#### *Creating a Vibrant Economy*

Land at Pitt Vale would be a primarily residential development with a community centre. As such it would not actively seek to adversely impact the vitality and viability of Winchester Town Centre. However, the site would provide economic benefits through job creation, additional demand for local services, through a Community Infrastructure Levy contribution and through a New Homes Bonus. It would further enhance the economy by providing an opportunity to live in close proximity to job opportunities in the centre and beyond (such as London).

#### *Conclusion*

Land at Pitt Vale should be considered an appropriate site for development being a sustainable location on the edge of Winchester Town. The site would help to meet the draft plan's strategic priorities and would provide a good location to provide a new community which could benefit from the 20-minute neighbourhood concept.

[What is your suggested wording or text for the policy:](#)

A number of concerns have been raised regarding the plan period, reliance on previously allocated sites, lack of buffer, unmet need/duty to cooperate, NPPF transition, affordability and affordable housing and windfall allowance. The conclusions reached demonstrate that the Council require additional sites to be allocated in order to provide for sufficient housing across the plan period. As part of this, a clear case exists for additional houses to be allocated at Winchester. The land at Pitt Vale represents a suitable site for development in this context, and the Plan should be modified to include it as a new residential allocation.

### Policy H5 – Meeting Housing Needs

Do you consider the supporting text and policy are

Legally Compliant      **Yes**    No

Sound                      **Yes**    **No**

Complies with the DtC **Yes**    No

Give details to support your answer above:

Vistry Partnerships agree that the Plan needs to deliver a range of house types and sizes, in order to meet identified housing needs. However, proposed Policy H5 will need to be revised to improve its effectiveness and practical implementation as a development management tool.

Firstly, the policy should be clearer that the mix of housing provided through a development should have regard not only to the latest evidence of need, but also to the characteristics of the site and the local area. This clarification is particularly necessary, noting that the Winchester District is geographically large and includes both urban and rural areas, where patterns of development will be very different.

A further concern is that, at limb 'i', the policy proposes that at least 30% of affordable dwellings for rent should be 3-bedroom or larger. Whilst this may be achievable on some sites, Vistry Partnerships are concerned that applying a 'blanket requirement' will not be effective in practice, as the appropriate dwelling-mix will (as previously stated) depend on localised / site-specific considerations, as well as the Plan-wide evidence of need.

Similarly, at limb 'ii', the policy envisages that *"At least 65% of affordable home ownership dwellings should be 2 or 3 bedroomed houses"*. Again, although this may be achievable in many cases, it is not appropriate for the policy to set out a blanket requirement, which would need to be applied regardless of the circumstances of a particular application and development proposal.

Furthermore, at limb 'iii' the policy would require at least 30% of market housing to be provided as 1 and 2-bedroom dwellings. In effect, this would necessitate the provision of a very high number of apartments, which is unlikely to be suitable in all locations, when taking account of site constraints, characteristics and other considerations that will inform appropriate densities. For this reason, this part of Policy H5 will likely lead to a conflict with the proposed policies relating to heritage (policies HE1 to HE14), landscape and rural character (policies NE9 and NE14), as well as the NPPF Section 12 'Achieving Well-Designed Places'.

As a separate requirement, Policy H5 proposes that developments of 50 dwellings or larger should be required to provide 6% of those dwellings as self-build plots. Vistry Partnerships do not agree that all larger developments should be required to provide a proportion of new homes as self-build plots. Based on experience elsewhere, the inclusion of self-build plots within larger developments can create significant problems during the construction stage, (e.g. delays, the visual impact of undeveloped self-build plots and reducing implementation rates overall). Instead, it is recommended that flexibility is built into the policy to take account of site-by-site circumstances including elements such as viability.

Furthermore, those individuals / households looking to purchase self-build plots are often seeking to acquire land at a reduced cost. However, self/custom-build homes are not recognised in the NPPF as a form of affordable housing. This means that it is not possible for Local Plan policies to require and apply discounted values. Uptake of self-build plots therefore tends to be limited in-practice. As such, Vistry Partnerships recommend that the Plan should instead look for opportunities to allocate sites specifically for self-build development, where they have been promoted for such by the landowner.

Concerning 'specialist and supported housing', Vistry Partnerships agrees the plan should make provision for specialist accommodation for older persons. Indeed, the SHMA 2024 identifies a requirement for such accommodation, with Table 5.7 (page 80) identifying a need for 1,004 market 'housing with support' units (i.e. retirement living) over the period 2020 – 2040, in addition to 540 'housing with care' units (both market and affordable), as would be met through extra care housing formats. Table 5.7 also identifies a need for a further 547 care home/nursing home beds by 2040.

However, rather than requiring all residential schemes of 50 or more dwellings to provide such specialist accommodation (an approach unlikely to be effective in practice), the new Local Plan should instead allocate specific additional sites for such. This will provide more certainty that the identified need for specialist accommodation will be addressed. This is indeed the approach recommended in paragraph 6.40 of the SHMA 2020;

*"To support the delivery of specialist accommodation, it may be appropriate for the Council to consider making specific land allocations for specialist housing for older persons within the new Local Plan."*

#### What modifications are necessary to make this policy legally compliant or sound?

Overall, Vistry Partnerships consider that Policy H5 (as presently drafted), is not consistent with national planning policies, nor will it be effective when used to determine planning applications. The draft policy therefore requires substantial revision in order to render it more flexible and practical. In conclusion, the policy should be reworded to:

- Remove the blanket requirement for 30% of all affordable dwellings for rent to be 3-bedroom or larger and replace with more flexibility incorporated on a site-by-site basis and/or to be based upon most up to date evidence on housing need;
- Remove the blanket requirement for 65% of affordable homes to be 2 or 3 bedroomed houses and replace with more flexibility incorporated on a site-by-site basis and/or to be based upon most up to date evidence on housing need;

- Remove the blanket requirement for at least 30% of market housing to be provided as 1 and 2-bedroom dwellings and replace with more flexibility incorporated on a site-by site basis and/or to be based upon most up to date evidence on housing need; and
- Introduce the need for self-build plots on a site-by-site basis depending on factors such as viability.

What is your suggested wording or text for the policy:

See above

### Policy H6 – Affordable Housing

Do you consider the supporting text and policy are

Legally Compliant      **Yes**    No

Sound                      Yes    **No**

Complies with the DtC **Yes**    No

Give details to support your answer above:

Vistry Partnerships agrees that a policy such as this is necessary to secure the provision of affordable housing. However, Vistry Partnerships are concerned that the policy wording creates a lack of certainty. This is particularly in respect of the proposals to reduce the affordable housing tariff, where developments are required to mitigate the impact of additional nitrates and phosphates on the River Itchen SAC.

Whilst it is understood why the affordable housing tariff might need to be reduced to ensure viability, the proposal to reinstate a higher requirement in future (if and when the costs of nutrient-related mitigation reduce) is not likely to be workable and effective. Specifically, draft Policy H6 states that:

*“All affordable housing will be secured by use of a s106 agreement, which should include a requirement to increase of provision of affordable housing up to the 40% overall target (30% for previously developed sites) if the costs of nitrate and phosphate mitigation reduces significantly.”*

It is not clear how changes in cost would be measured and monitored in-practice, and therefore it is uncertain that schedules in a Section 106 Agreement would provide an effective ‘value capture’ mechanism for the envisaged purposes.

Indeed, noting that the evidence base is unclear when the cost of mitigation will reduce (if this occurs at all) an uplift in the overall housing requirement appears to be outright necessary to ensure that affordable housing needs are fully met.

Draft Policy H6 sets out the affordable housing requirements with a 40% requirement for greenfield sites and 30% requirement for brownfield sites (in recognition of the increased development costs associated with brownfield land). With the Council’s priority on brownfield sites in the first half of the Plan period, only 30% affordable housing will be provided per site. This assumes a policy compliant amount will be provided, despite it being widely recognised that Brownfield sites frequently require

additional work (such as ground remediation), as evidenced by the under-delivery of affordable housing during the Plan-period of the adopted LPP1.

This will limit the ability for the Plan to address the specific needs of the District's communities that are in need for affordable housing provision – contrary to the clear objective set out in paragraph 60 of the NPPF.

Another solution of addressing the affordability and affordable housing delivery problems within the District is to allocate a greater number of homes on greenfield sites. This would ensure the allocated sites have a requirement to deliver 40% affordable homes on each site thereby increasing the overall support of affordable housing.

[What modifications are necessary to make this policy legally compliant or sound?](#)

Vistry Partnerships suggest that the affordable housing tariff be set at 25% and 35% (respectively for previously developed and greenfield sites), with this matter being revisited through the Local Plan Review mechanism and no later than 5-years of the anniversary of the Plan's adoption.

In Vistry Partnerships view, and as previously noted, in order to off-set the resultant shortfall in affordable housing currently experienced by WCC, the Local Plan should increase the overall housing requirement and allocate additional land for development. The consequential increase in market housing provision will facilitate the viability and supply of new affordable homes.

[What is your suggested wording or text for the policy:](#)

See above.

## **Winchester Site Allocations**

### **Policy W2 – Sir John Moore Barracks**

[Do you consider the supporting text and policy are](#)

Legally Compliant      Yes      **No**

Sound                      Yes      **No**

Complies with the DtC   **Yes**      No

[Give details to support your answer above:](#)

The draft Local Plan includes an allocation for 750-1,000 homes at Sir John Moore Barracks. The wording in the Local Plan suggests an indicative number of homes on the site to be 750-1,000 dwellings. This is a significant range with a disparity of between 250 homes. Furthermore, we note that at paragraph 12.15 of the Draft Local Plan the figure of 900 homes is stated for the site, and that this is only a '*working assumption*'. The ability of the site to provide either 750 homes or 1,000 homes has a significant impact on the delivery of the spatial strategy of the Local Plan and the potential need to identify further sites for development within the Winchester Town location. It is noted the draft plan includes a buffer beyond the minimum standard method need. However, this

buffer is presented for the specific purpose of accommodating unmet needs from neighbouring authorities – rather than to offset the delivery of the lower number of homes from this site.

The draft Local Plan sets out a number of constraints within the site, which would impact the overall quantum of deliverable development, which Vistry Partnerships consider include:

- Need to mitigate against the potential to impact upon the River Itchen Special Area of Conservation (SAC) in terms of nutrients;
- Part of the site has high risk of flooding from surface water and groundwater flooding with surface water flooding within the southern part of the site;
- Part of the site is located within a settlement gap; and
- Site includes the Flowerdown Site of Importance for Nature Conservation (SINC).

In addition, there is a Scheduled Ancient Monument to the west of the site and the ‘Development Strategy and Site Selection’ document recommends that development is restricted along this boundary. With such a high number of constraints, Vistry Partnerships consider additional detailed work should be carried out to understand how many homes can realistically be accommodated on the site to prevent such a large range in capacity and evidence the site’s deliverability and or developable status, and to further ensure the proposed policy is positively prepared (i.e. based on the most up-to-date evidence).

The site is currently owned by the Ministry of Defence and is a functioning Military Barracks. The draft Local Plan is silent on whether there is any contamination on the site, which is likely given its current use. The clearance of any contamination has the potential to significantly impact timeframes.

The draft Plan is clear that brownfield sites are to come forward earlier in the Plan Period, with greenfield sites to come forward at a later stage. It is therefore assumed that this is the assumption for development of the Barracks. The SHLAA notes that “*The DIO are working towards having planning permission granted for the redevelopment of the site prior to them de-commissioning the site in 2026*”. Assuming the site does benefit from Outline planning permission, completions will not be forthcoming for a number of years.

The Lichfield’s research finds that for sites of this nature, from Outline permission to first completion of a house is on average 3 – 4.6 years. At a very high level this means that at the time of granting Outline permission, limited housing will be provided within a five-year period. Based on the assumptions of the SHLAA that Outline permission will be granted in 2026, it is therefore unlikely any meaningful completions will be made before 2030.

This demonstrates that WCC will need to rely on medium and smaller greenfield site allocations in the first 5 years of the Plan following adoption rather than such a large scale brownfield site.

#### [What modifications are necessary to make this policy legally compliant or sound?](#)

Additional work should be undertaken and evidenced to demonstrate how 900 homes can be accommodated on the site alongside the constraints listed above. There is insufficient information at

present for those responding to the Local Plan to have any reassurance that 900 homes can be provided on the site: and the timing for the delivery of these units within the plan period.

What is your suggested wording or text for the policy:

See above comments.

### Integrated Impact Assessment

If you have any comments regarding the Integrated Impact Assessment please include as much detail below including page, paragraph and criteria number.

#### Assessment of Site Ref HU03

The Integrated Impact Assessment (IIA) forms part of the evidence base underpinning the Local Plan.

The IIA considers the sites assessed within WCC's Strategic Housing and Economic Land Availability Assessment (SHELAA) 2021 and considers each site against 14 objectives. It should be noted that the actual assessment only considers sites against 11 of these objectives.

Land at Pitt Vale has been promoted by Vistry Partnerships (and Linden Homes previously) for inclusion within the Local Plan for a number of years. It was assessed under SHELAA reference HU03. Table 1 sets out the scores assigned in the IIA.

**Table 3.** Assessment of Land at Pitt Vale, Winchester

IIA Objective Score	Score
IIA1: climate change mitigation	Minor positive (+)
IIA2: travel and air quality	Minor positive (+)
IIA4: health and wellbeing	Minor positive (+)
IIA7: services and facilities	Minor positive (+)
IIA8: economy	Negligible uncertain (0?)
IIA9: biodiversity and geodiversity	Significant negative (--)
IIA10: landscape	Minor negative uncertain (-?)
IIA11: historic environment	Negligible uncertain (0?)
IIA12: natural resources	Significant negative (--)
IIA13: water resources	Negligible (0)
IIA14: flood risk	Negligible (0)

Vistry Partnerships have assessed the criteria and the following comments can be made on the assessment of Land at Pitt Vale.

*Objective IIA1: climate change mitigation*

The aim of this objective is to minimise the District's contribution to climate change through a reduction of greenhouse gas emissions with the site appraisal criteria based around the location of facilities including GP surgeries, primary and secondary schools, town centres, local centres, railway station and bus stops, open space and employment.

Land at Pitt Vale is excellently located on the outskirts of Winchester and truly represents a 20-minute neighbourhood. Within a 20-minute walk, the following facilities can be reached:

- Pitt Park and Ride, Pitt Park and Ride Bus Stops, Pitt Village Bus Stops and Pitt Roundabout Bus Stop
- St Peter's Primary School
- Oliver Battery Dental Surgery
- The Prior Hair Lounge
- One Stop and Londis Convenience Stores
- Oliver Battery Post Office
- Barlow's Butchers
- St Stephen's Catholic Church
- South Winchester Golf Course
- Walpole Road and Manor Road playgrounds

Within a 20-minute cycle, the following additional facilities can be reached:

- 5 x nursery schools
- 8 x primary schools
- 2 x secondary schools
- Sixth Form College
- University of Westminster
- Winchester School of Art
- 12 x dentists
- 4 x pharmacies
- 4 x GP surgeries
- Royal Hampshire County Hospital
- 3 x Churches
- Winchester Railway Station
- St Cross Cricket Club
- Winchester and District Canoe Club
- Fallodon and Winnall Moors Nature Reserves
- Theatre Royal Winchester
- Everyman Cinema,
- Soft Play



- Parks and Abbey Gardens
- Bar End Sports Stadium

The IIA Appendix F sets out an assessment of the site against the criteria and notes that the site is not located within 2,000m of a railway station, which presumably explains only a Minor Positive score being given.

Given the emphasis of a 20-minute neighbourhood within the draft Local Plan, and the fundamental emphasis of the climate emergency, the fact that Land at Pitt Vale is well placed to reach key facilities within either a 20-minute walk or cycle should, in Vistry Partnerships opinion, be given significant weight.

Therefore, Vistry Partnerships consider the score of '**Significant positive effect likely**' to be recorded.

*Objective IIA2: travel and air quality*

This objective aims to reduce the need to travel by private vehicle in the District and to subsequently improve air quality.

As demonstrated above, Land at Pitt Vale is very well positioned to provide a truly 20-minute neighbourhood with 20-minute walking and cycling to a wide range of facilities ranging from retail, health, leisure, religious buildings, schools and employment. The ability to reach these locations by sustainable modes of transport is a significantly positive factor for the Land at Pitt Vale site and the score should be upgraded accordingly to '**Significant Positive**'.

*Objective IIA4: health and wellbeing*

Objective 4 seeks to improve public health and wellbeing and reduce health inequalities in the District.

The IIA sets out the following commentary regarding Land at Pitt Vale:

*“The site is not within 500m of an AQMA. The majority of it is within an area where noise levels at night from roads and railways are below 50 dB and the noise levels as recorded for the 16-hour period between 0700 – 2300 are below 55 dB. The site does not lie within a noise contour associated with Southampton Airport. It is not within 400m of a wastewater treatment works or within 250m of a waste management facility. The site is within 801-1,200m of an NHS GP surgery. It is within 300m of open space, open country or registered common land. The site contains no open space, open country or registered common land. It is within 200m of a public right of way or cycle path.”*

This commentary sets out that Land at Pitt Vale is not located in a place which is associated with poor health. It states that the site does not contain open space, open country or registered common land. However, it correctly points out that open space is within 300m of the site. Our proposals also include the provision of new public open space providing greater public accessibility to this edge of settlement location.

Vistry Partnerships consider the score for the site should be upgraded to **‘Significant Positive’**.

*Objective IIA7: services and facilities*

This objective seeks to ensure essential services and facilities and jobs in the District are accessible with the same assessment criteria as Objective 1. For the reasons set out for Objective 1, the score should be upgraded accordingly to **‘Significant Positive’**.

*Objective IIA9: biodiversity and geodiversity*

Land at Pitt Vale has been scored ‘Significant Negative’ against this criteria with the IIA noting that the site is within 500m of a locally designated wildlife site or ancient woodland and within 200m of a priority habitat.

It is important to confirm that there are no locally designated wildlife sites, ancient woodland or priority habitat within the site itself.

The location of Land at Pitt Vale within the vicinity of a locally designated wildlife site and protected habitat does not have to be negative. In fact, a sensitive development of the site with appropriate buffers where necessary would add an additional level of protection to the wildlife site and priority habitat. Accompanying these representations is an Ecological Technical Note which considers the potential impact of allocating the site for development on the locally designated wildlife site. This concludes that the development would have no impact and as such, in Vistry Partnerships opinion the score should be upgraded to at least **‘Negligible’**.

*Objective IIA10: landscape*

This objective seeks to conserve and enhance the character and distinctiveness of the District’s landscapes. Land at Pitt Vale scores ‘minor negative uncertain’ with an explanation provided that the site has medium or higher overall landscape sensitivity.

As set out within the Vision Document which supported the previous iteration of representations and is submitted under separate cover as part of these representations the development would be designed sensitively to respond to the landscape characters of the site. The visually sensitive upper slopes of the site would be kept free from development and dedicated to public open space with built form only located on the lower part of the site. Vistry Partnerships proposed vision for the site therefore proposes that development would cover only 8.4ha of the site with over 15ha of public open space. The site is currently not accessible to the public and the development of the site would therefore provide 15ha of open space which would be publicly available for a range of recreational uses.

There are no logical landscape features present within the site which act to constrain the limits of development. Vistry Partnerships have undertaken a review of historic mapping which identified a number of former field boundaries which have been lost due to field amalgamation. This provides an opportunity to reinstate the Site’s former landscape structure which provides an additional benefit of ensuring there is a definitive edge to the development and settlement and actual and perceived separation between Land at Pitt Vale and Pitt itself.

Whilst WCC consider the site to have medium or high landscape sensitivity, as set out above, development at Land at Pitt Vale would be sensitively designed to respond to the landscape character on site. A Landscape and Visual Technical Note has been prepared by Tyler Grange and submitted in support of these representations. The Technical Note concludes that the site is visually well contained by the main ridge to the north, with views limited to short stretches of Sarum Road and the northern end of Clarendon Road. The site is contained from the west by Collis Copse and the adjacent ridgeline and woodland belt and the lower parts of the site are relatively visually contained with isolated viewpoints. Any development on the site would be viewed within the context of the existing built form of Winchester. The Note also acknowledges the opportunities for structural planting within the site. As such, the score should be updated to '**Negligible**'. *Objective IIA11: historic environment*

Objective 11 seeks to conserve and enhance the District's historic environment with the site scoring 'Negative Uncertain'.

There are no listed buildings within the development site in itself. In proximity to the site are 12 Grade II listed buildings and one listed milestone. Six of the listed buildings and the listed milestone are located along Enmill Lane, to the south west of the site. The other 6 listed buildings are located in the former Pitt Manor Farm (on the southern side of the Romsey Road).

The setting of the listed buildings along Enmill Lane would not be changed to the extent that the significance of the buildings would be harmed. Furthermore, the character of the existing settings are not dependant on wide or expansive views of the development site as the existing trees and hedgerows in the area limit views beyond the curtilage of the houses.

The 6 listed buildings that form the former Manor Farm do not have a traditional quiet or tranquil rural location that would be compromised by the development of the application site. The wider setting of these buildings are largely to the south east and relate more logically to the edge of the town to the east. The existing setting of these listed buildings has already changed because of the proximity to this built edge and the clear views of Oliver's Battery from within the settings of the listed buildings. Therefore, the development of the site to the north of the former Manor Farm would not affect the significance of the listed buildings.

There is a garden of local significance at Pitt Manor, on Kilham Road to the north east of the site. However, this is not a national designation and the garden is a sufficient distance away not to be affected by any proposals on the site.

Given there would be no harmful impact on the historic environment, Vistry Partnerships consider the score should be updated to '**Minor Positive**'.

Table 2 below sets out the assessment scores given by WCC and the reasonable adjustments that should be given noting the above commentary:

**Table 4.** Comparison of IIA assessment by WCC and Vistry Partnerships

IIA Objective Score	Score	Vistry Partnerships Assessment
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IIA1: climate change mitigation	Minor positive (+)	Significant Positive (++)
IIA2: travel and air quality	Minor positive (+)	Significant Positive (++)
IIA4: health and wellbeing	Minor positive (+)	Significant Positive (++)
IIA7: services and facilities	Minor positive (+)	Significant Positive (++)
IIA8: economy	Negligible uncertain (0?)	Negligible uncertain (0?)
IIA9: biodiversity and geodiversity	Significant negative (--)	Negligible (0)
IIA10: landscape	Minor negative uncertain (-?)	Negligible (0)
IIA11: historic environment	Negligible uncertain (0?)	Minor positive (+)
IIA12: natural resources	Significant negative (--)	Significant negative (--)
IIA13: water resources	Negligible (0)	Negligible (0)
IIA14: flood risk	Negligible (0)	Negligible (0)

As set out in Table 4, Vistry Partnerships assessment of Land at Pitt Vale against the criteria set out in the IIA provides a realistic assessment of the site taking into account accurate information regarding the site and information that has been made available to the Council. This sets out that the site should have a more positive score and be considered more favourably by WCC.

#### Policy On / Policy Off – Inconsistency of Evaluation

Following the above, Vistry Partnerships is concerned with the inconsistency of the application of a 'policy-off' vs 'policy-on' approach in the IIA methodology. In this respect, sites proposed for allocation are evaluated based on potential mitigation measures (i.e., 'policy-on'), improving their scoring. This is explained in paragraphs 5.282 to 5.288 of the Main IIA Report. However, the potential for mitigation is discounted where omission sites are considered. This is apparent from the assessments undertaken in Appendix F of the IIA and the explanation commencing at paragraph 4.269 of the Main IIA Report. Indeed, this paragraph confirms that details provided by developers/site promoters (such as technical reports, emerging masterplans, and Vision Documents) were not considered when evaluating omission sites.

Therefore, Vistry Partnerships is very concerned that in the absence of a like-for-like comparison, the proposed suite of allocations may not represent the most sustainable of the available options. For example, Land at Pitt Vale is marked down in objective 1 as it does not contain any open space. However, the proposed development (as clearly set out in previous representations and Vision Documents) demonstrates a significant amount of open space would be provided. Assumption of open space on the site would also improve the score against objective 4. WCC need to ensure a consistent approach to site selection is maintained without additional assessments of draft allocations.

Secondly, in not considering the potential for mitigation when evaluating omission sites, the IIA effectively reduces the number of sites (promoted and available for development) that could (with mitigation) reasonably be expected to address the IIA criteria and strategic objectives of the Local Plan. This disguises the potential of the Plan to deliver a higher housing requirement than is proposed.

#### Reasonable Alternatives

As indicated in our representation on Policy H1, where reasonable alternatives for 'Levels of Growth' are considered in the IIA Main Report (pages 588 to 595), the Council appears to have relied upon shortlisted HELAA sites, the identified preferences of Parish Councils and the feedback provided from previous Regulation 18 consultations.

As such, the potential to provide for a significantly higher level of overall housing growth (for example, 3,000 to 5,000 additional dwellings above the current proposal) has not been properly tested in the IIA. This is a key shortcoming given the prevalence of unmet needs in the region and the pending uplift in the Standard Method.