
Winchester Local Plan 2020 -2040

Regulation 19 Publication

Supporting Statement for Representations

on behalf of

Shorewood Homes

Citizen Space Representation No.s
ANON-AQTS-32UQ-4, and ANON-AQTS-32UC-P

relating to

Policies SP2, SP H1 and SP H3

1. Introduction

- 1.1 This statement sets out the detail of Shorewood Homes Regulation 19 representations on the emerging Winchester Local Plan 2020-2040. It specifically addresses the following policies with their accompanying supporting text and evidence base:
- Strategic Policy SP2 – Spatial Strategy & Development Principles
 - Strategic Policy H1 – Housing Provision
 - Strategic Policy H3 – Spatial Housing Distribution

2. Spatial strategy and spatial distribution

- 2.1 The spatial strategy of the Plan is set out in Policy SP 2 with the spatial housing distribution addressed in Policy H3.

- 2.2 Policy SP2 identifies 3 spatial areas and the development principles for each. Winchester Town is identified as making provision for about 5,640 new homes through a range of accommodation. The growth focus in Winchester Town is supported, especially in light of the new Government's ambition to deliver 1.5 million new homes across the country in the next five years and Winchester's historic role as an important sub-regional centre. However, it is considered that the Plan is not ambitious enough in relation to the level of housing growth to be accommodated in Winchester Town on small to medium sites.

3. Housing need and target

- 3.1 Policy SP H1 sets out a housing target of 15,115 for the district. This is based on:
- a Standard Method calculation for a 20 year period stretching from 2020 to 2040 giving 13,563 dwellings
 - Assignment of 350 dwellings to the South Down National Park
 - Addition of 1900 homes to meet unmet needs in other areas
- 3.2 The Council's use of the Standard Method to calculate its local housing need, and its commitment to meet a portion of unmet need from other areas is applauded and welcomed. However, the Standard Method calculation is based on the current methodology which the new Labour Government has strongly signalled its intention revise in order to significantly boost housing delivery and achieve its ambition to build 1.5 million homes over the next 5 years.
- 3.3 On 30 July 2024 the Government published a Written Ministerial Statement and draft Standard Method and NPPF. These documents indicate a clear direction of travel in terms of national planning policy in relation to meeting housing needs. Paragraph 4 of the NPPF consultation document states that the government is "proposing a revised standard method which aligns more closely with the Government's aspirations for the housing market." In late September the Minister for Housing and Planning Matthew Pennycook warned Councils that he will intervene if councils produce plans with housing targets 'way under' their needs. The consultation on the new standard method and revised NPPF recently concluded and it is currently expected that an updated SM and NPPF will be published either toward the end of this year, or early next.

- 3.4 Although the proposed revised Standard Method and NPPF are still at the consultation stage, and thus subject to potential change, the direction of travel is clear and recent appeal decisions have afforded some weight to it.
- 3.5 The Government has helpfully published tables showing what the councils new housing need figures would be if the proposed Standard Methodology were used. In Winchester's case the current Standard Methodology derived figure of 676 dpa dwellings would rise to 1099dpa, a difference of 423 and almost two thirds more than the existing. Applying this new Standard Method figure to the current plan period would result in a requirement of 21,980 homes over the 2020-2040 plan period for Winchester District. This is 6,865 dwellings above that identified in SP2 and Table H1 of the Plan.
- 3.6 Consideration would need to be given to how much of Winchester's requirement for 21,980 new homes would be allocated to the National Park, and how much of neighbouring authorities needs could still be met. However, even if the unmet needs commitment were dropped and a much higher figure were assigned to the National Park to deliver, Winchester's housing requirement is still likely to significantly increase.
- 3.7 The Government has indicated that Councils with a "significant gap of over 200 dwellings per annum between the local planning authority's revised LHN figure and the emerging housing requirement will need to revise their plan in line with the revised NPPF before submitting the plan for examination no more than 18 months after the publication of the revised NPPF (Chapter 12, para 7). On the basis of the figures outlined above, this need to review the plan before submission would apply to Winchester.
- 3.8 In light of all of the above, it is submitted that the Council should take account of the Government's new direction of travel and take time to carefully consider whether it should progress to submission, or instead return to an early stage of plan-making to revise its plan in accordance with the new NPPF before re-submitting.
- 3.9 In this context, the Council will need to keep an open mind regarding the supply of sites that it can draw upon to meet potentially higher housing numbers. This is addressed in the following section.

4. Sources of housing supply

Winchester Town Windfall

- 4.1 Para 70 of the current NPPF (Dec 2023) recognises that small and medium sized sites can make an important contribution to meeting the housing requirements of an area. Authorities are asked to support the development of windfall sites through their policies and decisions, especially within existing settlements. Para 72 expects there to be compelling evidence that they will be a reliable source of supply and realistic in nature.
- 4.2 Strategic Policy H1 indicates that housing development will be distributed between 3 spatial areas, one of which is Winchester Town. The town is expected to accommodate about 5,640 dwellings in the plan period. Table H2 of the Plan identifies a number of housing supply sources for the town to meet this target. One of the largest recognised sources is windfall, providing 1,035 dwellings or 18% of the supply. The inclusion of this substantial windfall allowance has been justified through the 2021 evidence base document - Assessment of Windfall Trends and Potential.
- 4.3 Paragraph 3.3 of the Assessment identifies that an average of 88 dwellings per annum over the 2012 – 2019 period came from windfall sites, making up over half the total of the Winchester Town completions. If the 88 dpa windfall figure was multiplied over the plan period this would give a total windfall supply of 1,760. This is a much lower figure than the 1035 dwellings that identified in Para 12.4 amounting to over 700 less. On this basis the Council have taken a very conservative approach to windfalls and the amount of supply expected to come forward over the plan period from Winchester Town windfalls. This level of cautious approach is not considered justified.
- 4.4 Shorewood Homes support the inclusion of a high windfall allowance for Winchester Town. The detailed justification for the allowance is welcomed and it is considered that compelling evidence for their inclusion in Winchester Town's supply is considered to exist. However, it is suggested that the Council has been overly cautious in its assumptions about the amount of supply that may come forward from windfall as the historic figures have shown a far higher annual contribution from this source. In terms of soundness and justification, Strategic Policies SP2, H1 and H3 should be strengthened by increasing the level of windfall allowance for the Town.

- 4.5 Residential redevelopment is identified as significant component of the Winchester windfall supply and Shorewood's 3ha proposed residential redevelopment site at Pitt Manor, Romsey Road, Winchester for 48 net new homes is evidence that this form of development will continue to be a reliable source of supply for the Town.
- 4.6 The Pitt Manor site is considered to be a suitable and deliverable site capable of bringing forward a high quality development in a highly sustainable location. A recent pre-application meeting confirmed that the principle of the site was acceptable. The Pitt Manor site supports the Council's and Government's strategy to bring forward urban small/medium sites on a quick basis, enabling timely delivery to meet acute needs. It also responds to the Council's objectives regarding climate change mitigation and reducing carbon footprints. On this basis, it is considered to be a suitable site for contributing towards Winchester Town's future windfall supply.