

Winchester Local Plan Regulation 19 consultation

Representations prepared on behalf of Hallam Land.

1. Introduction

- 1.1 These representations have been prepared on behalf of Hallam Land. Hallam Land have land interests at Denmead which are suitable to providing new housing.
- 1.2 Policy DEN1 of the consultation document intends that the Neighbourhood Plan allocates land for about 100 dwellings, including any required amendments to the settlement boundary.
- 1.3 The role and quantum of new housing directed to Denmead is of course framed by the consultation document's overall approach to housing provision. In this regard, where a higher housing requirement is necessary, a greater amount of housing could justifiably be direct to Denmead. The Neighbourhood Plan group are presently consulting on options that could together provide at least 300 new homes.
- 1.4 Our representations are prepared in this context.

2 Vision, Objectives and Strategic Policy 1

- 2.1 The consultation document is to be read as a whole; paragraph 2.5 emphasis this in bold text.
- 2.1. Its *Housing for All* objective comprises: "*Delivering high quality and adaptable new housing to meet local needs, including a range of sizes, types of residential accommodation and tenures.*" (emphasis added)
- 2.2. Strategic Policy SP1 states that: "*The council is committed to the delivery of the vision and objectives of the Plan and that "The Plan will meet the aims set out in the Vision and Objectives..."*" (emphasis added)
- 2.3. This is germane to how the consultation document's policies and proposals should be measures; do they in fact meet the aims of delivering new housing to meet local needs?

3 Strategic Policy H1

- 3.1. Strategic Policy H1 intends that provision is made for 15,115 dwellings over the plan period of 2020 to 2040.
- 3.2. This is to be read and understood in the context of the Objectives which the consultation document explains at Section 3. For the reasons set out below, this is not achieved and the Plan is not effective.
- 3.3. Table H1 explains the calculation of the housing requirement derived from the *Standard Method*, to which is added an amount to accommodate some unmet need for elsewhere in the PUSH area. A further adjustment is made to allow for likely housing in the National Park.
- 3.4. The LPA intend to progress the Local Plan ahead of amendments to the NPPF coming into effect. The practical effect of this is that, because of the likely increase in local housing need, there will need to be **an immediate review** of the Local Plan. Presently, the revision to the standard method suggests that the housing requirement for the plan area would increase from 676 dpa to 1,099 dpa.
- 3.5. Moreover, whilst the plan makes some provision for unmet need, the scale of that shortfall across the PUSH area is also expected to increase in the constituent areas.
- 3.6. For these reasons it is evident that there is a significant challenge ahead of the LPA to achieve the step change in new housing that is expected. In this context, this version of the Local Plan should be seen as a minimum amount of new housing. Where opportunities exist to increase housing supply they should be seized upon as part of a positively prepared strategy.
- 3.7. We are aware of representations from amongst others the Home Builders Federation (HBF) that cite significant issues with the implementation of the duty to co-operate which raises fundamental questions about the soundness of the plan in any event.
- 3.8. We also concur with the representations made regarding the plan period with the intent to reduce the residual requirement on account of past delivery rates. The NPPG is clear on how the plan should be prepared in this regard and the plan period for calculating the housing requirement should be amended accordingly.

Housing supply

- 3.9. The Council's housing supply strategy estimates that it can deliver 15,441 new homes between 2020 and 2040. This should be contrasted with the requirement 15,115 dwellings in Strategic Policy H1. It is inescapable that this represent a theoretical oversupply of just 300 new homes or 2%. This is an inadequate degree of contingency or flexibility and it is much more common to have significantly higher flexibility allowances. Increasing this to 10%, which is not uncommon, would require land for an additional 1,200 new homes to be identified.
- 3.10. If, as the HBF contend, the plan period is amended to start at 2024, the supply over the remaining 17 years to 2040 is less than the corresponding requirement - a supply of just 12,200 compared to a requirement of 13,392 new homes. This illustrates the reliance that has been placed on past completions to meet future needs.
- 3.11. In short, over the next 17 years fewer homes will be built than the required amount over that same period. That cannot be consistent with the Government's intention that the supply of new homes is increased. The Written Ministerial Statement of July 2024 signals the direction of travel:
- "We are in the middle of the most acute housing crisis in living memory. Home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home*
- We are therefore updating the standard method and raising the overall level of these targets – from around 300,000 to approximately 370,000."*
- 3.12. Even if the District Council wish to avoid preparing a plan pursuant to expected changes in the NPPF, it must recognise that it isn't providing the increased housing supply that is necessary to "meet local needs".
- 3.13. Accordingly, Strategic Policy H1 and the housing supply component are not sound propositions; they are neither justified, effective or positively prepared.

4 Denmead

- 4.1. The spatial strategy focuses development at Winchester in the first instance and then large scale allocations in what is termed the PUSH area (west of Waterlooville and north of Whiteley). There then follows a series of market towns and larger rural villages; of which Denmead is one.
- 4.2. The Background Paper relating to Settlement Strategy, reviewed in 2022, provides the justification for this categorisation and Denmead is plainly amongst the better performing settlements in terms of the range of facilities and accessibility.

- 4.3. Denmead also benefits from its proximity to Waterlooville. Conveniently accessible to the residents of Denmead are the higher order services that have justified the strategic role afforded to this main town. The proximity of these two settlements is best highlighted by the fact there is a strategic gap designation between them to prevent coalescence. Whilst that may be appropriate in terms of the morphology of the settlements, it emphasises the spatial and function inter-relationships between them.
- 4.4. Denmead is materially different to other settlements in this regard, for example Swanmore and Wicklow and Colden Common, that are more remote from the District's main settlements.
- 4.5. Policy DEN1 of the consultation document intends that Denmead accommodate some 330 new homes over the period 2020-2041. This is not an effective policy in the context of other representations made concerning housing provision or on its own face regardless.
- 4.6. Of this total, 117 have already been built. In the event the plan period is changed for the reasons given in preceding sections, Denmead is intended to provide 211 new homes. Its contribution to the total housing requirement would fall from 2.1% to 1.6%.¹ To maintain the same proportion in the alternative scenario, Denmead's contribution would need to increase to 290 new homes (excluding completions).
- 4.7. The components of supply include outstanding commitments and allocations from the Neighbourhood Plan and a windfall allowance of 50 dwellings. This windfall allowance is a highly uncertain component. The NPPF is clear that:
- “Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.” (paragraph 72 refers)*
- 4.8. The illustration of the settlement boundary (as existing) is shown on page 436 of the consultation document. Examination of this reveals very few opportunities for windfall development within the settlement boundary and it is notable that there are no proposed revisions to the boundary. Where there are greenspaces, these are either established areas of open space or large residential curtilages.

¹ 328/15,115 = 2.17% compared with 211/13,392 = 1.57%

4.9. The genuine opportunity for windfall development is extremely limited and is not justified. No reliance should be placed on this in meeting Denmead's housing requirement.

4.10. For all of these reasons, Policy DEN1 should propose new housing allocations of at least 230 for the period 2024-2041, comprised of the following:

Outstanding permissions	33 dwellings
Remaining Neighbourhood allocations	28 dwellings
New sites to be allocation in DNP Review	229 dwellings
Total	290 dwellings

2.17% of 13,392 dwellings derived from the current standard method

4.11. Policy DEN1 should be amended accordingly in order for it to be justified and effective and positively prepared.

4.12. We are aware that the Neighbourhood Plan group are currently consulting on options that could provide allocations totalling 300 new homes. One of those options is land controlled by Hallam (see Appendix 1).

LRM Planning Limited
October 2024