CABINET

28 MARCH 2007

<u>LOCAL (HOUSING) RESERVE SITE RELEASES 2007 – RESULTS OF CONSULTATION</u> ON NEED ASSESSMENT

REPORT OF THE CHIEF EXECUTIVE

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RECENT REFERENCES:

CAB1280 – Supplementary Planning Documents on Local Reserve Sites and Infilling Policy – Proposed Adoption (Cabinet 26.10.06).

CAB1363 – Assessment of the Need for Local (Housing) Reserve Site Releases 2007 (Cabinet 13 December 2006).

EXECUTIVE SUMMARY:

Policy H.2 of the Local Plan Review allocates 4 'Local Reserve Sites' which are to be released only if monitoring indicates that they will be needed to meet the 'baseline' housing requirement for the District. The possible need for one or more of the sites to be released is to be reviewed annually, alongside the Council's Annual Monitoring Report. An 'Assessment of the Need for Local Reserve Site Release' was published for consultation in January 2007, following approval by Cabinet in December 2006. This report summarises and responds to the comments made, and recommends that Cabinet formally resolves not to release any of the Local Reserve Sites in the coming year. A similar monitoring and consultation exercise should be undertaken at the end of 2007, as required by the Local Plan and associated Supplementary Planning Document.

RECOMMENDATIONS:

1 That, taking account of the 'Assessment of Need for Local Reserve Site Releases 2007', the comments received on it, and the response at Appendix 1, Cabinet resolves that no Local Reserve Site releases are needed in the coming year.

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DETAIL:

1. <u>Introduction</u>

1.1. The Winchester District Local Plan Review 2006 includes a policy (H.2) allocating four sites as 'Local Reserve Sites', as follows:

•	Pitt Manor, Winchester	200 dwellings
•	Worthy Road/Francis Gardens, Winchester	80 dwellings
•	Little Frenchies Field, Denmead	70 dwellings
•	Spring Gardens, New Alresford	35 dwellings

- 1.2. Policy H.2 makes clear that these sites are only to be released if needed to meet a potential shortfall of housing to meet the Structure Plan's 'baseline' housing requirement for the District. The Local Plan Review therefore requires that housing provision and land availability is monitored regularly, to assess whether one or more of the Local Reserve Sites should be released. This is to be done in conjunction with the production of the Annual Monitoring Report (AMR), in December of each year.
- 1.3. A detailed Assessment of the Need for Local Reserve Site Release was undertaken to provide a critical examination of this information in order to reach a conclusion as to whether any of the Local Reserve provision needs to be released in the coming year. This Assessment drew on the Strategic Planning Authorities' series of 'H4 Monitoring Papers', which are a proven method of monitoring, so as to achieve consistency. The Assessment was published for consultation in January 2007 and this report deals with the comments made and the recommended response.

2. Response to Consultation on the Assessment

- 2.1. A total of 16 comments were received on the Assessment, from a variety of individuals and organisations. These are summarised in Appendix 1. A few comments noted the Assessment but sought no changes, but most were seeking changes to the Assessment or to the allocated sites. The comments generally fell into 3 main groups:
 - Development interests saying that the Assessment over-estimated the supply of land, most of whom promoted the release of particular sites;
 - Parish Councils, amenity groups or residents saying that the Assessment showed that the Local Reserve Sites are not needed and should be removed from the Plan, or that new issues had arisen which meant they should not be developed;
 - Groups or individuals suggesting that the Assessment should not look just at the Structure Plan's numerical requirement but should also look at affordable housing need and release the Spring Gardens, Alresford site on this basis.

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- 2.2. The development interests generally suggest that the contribution of West of Waterlooville MDA has been overestimated and that the Assessment does not follow the advise in PPS3 about maintaining a 5 year supply of land and not relying on windfall/unidentified sites. Appendix 1 responds in detail to these points but it is accepted that there remains uncertainty about the exact contribution West of Waterlooville will make to meeting housing requirements up to 2011. However, the strong performance of urban capacity and windfall sites (and the number of permissions already existing) suggests that a very pessimistic assumption would need to be made about development at Waterlooville before there would be a need to release Local Reserve Sites. Nevertheless, this possibility cannot be ruled out and continued annual monitoring is needed, which could in future years indicate the need for Reserve Site releases.
- 2.3. Some organisations and individuals suggest that the Local Reserve Sites should be removed from the Local Plan or reallocated to other uses. However, the Assessment looks at the situation at a point in time and does not say that there will never be a need to release a Reserve Site during the Local Plan period. As noted above, the performance of the Waterlooville MDA could be critical and the assumptions about this, or other aspects of supply, may prove to be wrong. It is, therefore, appropriate that the Sites continue to be held in reserve and that the situation is monitored annually. The concerns raised about the merits of the sites, or alternative uses, were taken into account when the sites were allocated and the consultation was not about whether the allocation of the sites was correct.
- 2.4. Several bodies and individuals have highlighted the needs for affordable housing in the District and suggested that Local Reserve Sites could be released to help meet this need. The Spring Gardens, Alresford site in particular has been suggested as it is the smallest Local Reserve Site and its release would be supported locally. These respondents point to a remark by the Local Plan Inspector saying that the Council could consider releasing a site if a significantly higher proportion of affordable housing is proposed.
- 2.5. Whilst this option has some attractions, neither the Local Plan policy or the Supplementary Planning Document envisage affordable housing being the trigger for the release of Reserve Sites, although it may be a factor in deciding which site to release if the need for a site has been identified. Therefore, a decision to release a site to meet affordable housing would not automatically lead to the Alresford site being released and all 4 Local Reserve Sites would need to be considered and their owners approached to see what proportion of affordable housing they may offer. It is concluded that it would be dangerous to indicate a need for the release of a Local Reserve Site and to effectively embark on a 'bartering' exercise to see which one might offer the most affordable housing. There is, however, the possibility that the Alresford site could be considered as an affordable housing exception site, if it met the requirements of Local Plan Policy H.6 and if the owner were willing to release it. It is, however notable that this was the only site where the landowner/developer did not comment on the Assessment.

3. Conclusion

3.1. The Assessment of the Need for Local Reserve Site Release has been subject to consultation and the comments received are summarised at Appendix 1, which also responds to the comments made. Although it is not possible to be certain about the number of dwelling completions over the coming 5 years, especially in relation to the Waterlooville MDA, it is considered that the overall conclusions of the Assessment remain valid, taking account of the comments received. On the other hand, the Assessment cannot be so conclusive as to suggest the deletion of the Local Reserve Sites from the Local Plan and there remains a need to monitor the situation annually. Therefore, it is recommended that Cabinet resolves that there is not a need to release any Local Reserve Sites in the coming year.

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OTHER CONSIDERATIONS:

5 CORPORATE STRATEGY (RELEVANCE TO):

5.1 The Council's Corporate Strategy (2007 – 2012) identifies a High Quality Environment as a priority, including to 'use the planning system to promote the building of new homes to both meet local needs and Government set targets while protecting local character through sensitive design and appropriate densities'.

6 **RESOURCE IMPLICATIONS**:

6.1 None.

BACKGROUND DOCUMENTS:

Statistics relating to housing provision, held in the Strategic Planning Division.

APPENDICES:

Appendix 1: Analysis of Comments on Assessment of the Need for Local Reserve Site Release 2007.

Assessment of the Need for Local Reserve Site Release Analysis of Comments on 2007 Consultation Document

Name	Topic	Comment	Officer Response
Environment Agency	General	No comments. The Agency commented on the specific sites previously and these comments are still relevant.	Noted.
WCC Labour Group	General	Agree with the conclusion that it is not necessary to release the Local Reserve Sites.	Noted.
Winchester Housing Board	General	The consultation concentrates on numeric need in relation to the Structure Plan baseline requirement but does not raise the need for affordable housing. There is a massive shortfall of affordable housing - over 600 dwellings per annum and less than 140 affordable units are due to be completed this year. The Local Plan Inspector left it open to the Council to consider an early release where a significantly higher proportion of affordable housing was proposed. The Council should consider release of reserve sites where there is support from the local communities, such as the site in Alresford which has the support of the Town Council.	and included in the Local Plan, specifically as a means of addressing potential shortfalls in housing numbers in relation to the Structure Plan baseline housing requirement. However, the Inspector did suggest that the Council could 'consider whether an earlier release may be countenanced than would be the case purely in response to housing numbers, where a significantly higher proportion of affordable housing is proposed' (Inspector's Report, paragraph 6.14.14). Whilst the considerable need for affordable housing is accepted, Policy H.2 is clear that sites would only be released if the Structure Plan's numerical housing requirement appears unlikely to be met. Affordable housing need may be a factor in determining which Local Reserve Site(s) to release, as indicated in the Local Plan (paragraph

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			brought forward as an 'exception' site under Local Plan Policy H.6. This would require all housing provision on the site to be affordable.
Cala Homes	General	Cala Homes supports a Local Reserve Sites policy but has sought judicial review of the Local Plan because the Inspectors failed to consider land at Barton Farm. None of the sites should be released until the outcome of the judicial review as this would result in the release of less sustainable greenfield sites. The housing supply situation in the District continues to fail in respect of affordable housing. The level of housing being planned for is inadequate to meet affordable housing needs and the publication of a draft SPD on affordable housing suggests a compartmentalised approach. Increasing the supply of market housing will precipitate an increase in the supply of affordable housing.	or until any part of it is quashed by the High Court. As the judicial review has not yet been heard, Policy H.2 applies and it is appropriate that the annual assessment of the need to release Local Reserve Sites (LRSs) should be carried out. The issue of whether the Local Plan's housing requirements should be higher to take account of the need for affordable housing was considered during the Local Plan Inquiry and also considered when the Barton Farm planning application and appeal were determined. Whilst the shortage of affordable housing is undoubtedly an issue and increased general housing provision would lead to a proportion being for affordable housing, the need for affordable housing is not in itself a reason for triggering the release of the Local Reserve Sites. The annual assessment of the need for LRSs is not intended to be a review of the overall District housing requirement and this can only be done formally through the Structure Plan/South East Plan process.
Redrow Homes	General	PPS3 requires local authorities to ensure a continuous delivery of housing for 15 years from adoption of a plan. It requires specific sites to be identified for the first 5 years, which are available, suitable and achievable. This should not include sites with planning permission unless there is robust evidence to show they are developable and there should be no allowance for windfalls. There should be annual monitoring and arrangements for managing the release of land. Accordingly the Assessment should not include windfalls or identified sites which are not deliverable in the first 5 years.	wherein paragraphs 52-61 relate to delivering and maintaining a flexible supply of housing. However, it is clear from paragraph 53 that the advice relates to the processes to be followed in producing Local Development Documents, as part of the LDF, taking account of the requirements of Regional Spatial Strategies. The current consultation relates very specifically to a mechanism for ensuring adequate housing provision in accordance with a Structure Plan requirement, as incorporated in an adopted and 'saved' Local Plan. Therefore, whilst the advice contained in this section of PPS3 will be relevant to the production of Local Development Documents produced as part of Winchester's LDF, it is of less direct relevance to the assessment of the need for Local Reserve Sites. PPS3 refers to the need to draw on information from the Strategic Housing Land Availability Assessments which should be carried out

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		Therefore West of Waterlooville and unidentified sites should be discounted. On this basis there is a shortfall of 161 dwellings which is sufficient to release one or more of the Local Reserve Sites.	Assessments have yet to be completed and so the Strategic Housing Land Availability Assessments cannot yet be undertaken. The Urban Potential Study which is proposed as part of the LDF evidence base will also be relevant, but is only just starting. Therefore, it is legitimate to follow the process established in the adopted Local Plan and associated Supplementary Planning Document for assessing the need for LRSs. In any event, the current year's Assessment does look 5 years ahead and uses two different methodologies to try to reach a robust conclusion on the adequacy of supply.
KMA Consultancy	General	Not sure that the Assessment reflects advice in PPS3 about maintaining an adequate supply of land. PPS3 says that unimplemented permissions and windfalls should not normally be included.	context of the production of future Local Development Documents. In fact, PPS3 envisages some allowance being made for windfalls in the Strategic Housing Land Availability Assessment (PPS3, Annex C) and
Cala Homes	General	production of Strategic Housing Market Assessments. Therefore the whole	need to be reconsidered in the future, as work is progressed on the LDF in accordance with the requirements of PPS3. However, as noted above, the current consultation relates specifically to a mechanism, incorporated in the adopted Local Plan, for ensuring adequate housing provision in accordance with the Structure Plan
KMA Consultancy	General	should therefore be reduced by 400 dwellings. If these discounts are applied, the supply is less than the remaining Structure Plan requirement and only 4.4 years. If the South East Plan's housing requirements for the	estimates of the likely contribution of the West of Waterlooville MDA, ranging from 710 dwellings to 400 dwellings. Considerable progress has been made recently towards approving schemes for West of

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		years. This shortfall could be addressed by permitting legitimate windfall sites such as at Court Road, Kings Worthy. Resisting opportunities like this may result in the need to release greenfield sites so as to maintain a 5 year supply of land.	
Taylor Woodrow Developments	General	development of the West of Waterlooville MDA and of windfall allowances are flawed resulting in a significant distortion of the supply	land availability. This work will be progressed through the preparation of the LDF and can be incorporated into future years' Assessments, depending on the stage reached.

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Hampshire County Council Environment Department	General	explained except that the Policy H4 Monitoring Paper does apply a discount to large unidentified sites (15%).	Accordingly, making this correction does not alter the conclusion of
J Hayter	General	but not for the reasons given. The MDA completions start-up trajectory and peak profile make it highly unlikely that the	requirement. It is, therefore agreed that future Assessments could show a need for LRSs to be released, but this will depend on the results of future monitoring. On the basis of the evidence at present, the risk of provision at Waterlooville being so low as to need
Cala Homes	General	The estimated delivery of dwellings from West of Waterloooville have consistently been unrealistically optimistic. The Assessment's estimate is unrealistic and irresponsible having regard to the requirements of PPS3. Similarly, the estimate for Silver Hill is unrealistic.	See responses above. The evidence from recent completions is not that urban capacity and windfall sites are drying up. However, this will continue to be monitored in future Assessments.

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		Winchester is over-dependent on windfall sites and the Assessment assumes they will contribute 1430 dwellings. However, the 'easier' urban capacity sites have been implemented and windfall supply, is prone to significant year on year variations. PPS3 requires specific deliverable sites to be identified without including windfall allowances. Therefore identified supply is only 1456 units (3.2 years supply) compared to the Structure Plan requirement of 2246 dwellings.	
Mrs Payne (Late representation)	General	Assumptions about completions at West of Waterlooville have been overoptimistic and a more realistic assumption would be 400 dwellings by 2011. The urban capacity/windfall estimate is also over-optimistic as most straightforward sites have now been developed. Some of the existing permissions are only in outline and some may be subject to further constraints. PPS3 relaxes density requirements which will reduce the capacity of sites. A more realistic level of discounting would be 15% across all sites, reducing the estimate to 1215 dwellings and resulting in a shortfall of 860 dwellings (against the South East Plan's annual requirement).	
Mrs Payne (Late representation)	General		The South East Plan has not yet been adopted and is still at the Examination in Public stage. Until the South East Plan is adopted the Structure Plan remains part of the Development Plan and is the statutory basis for assessing land availability. PPS3 requires planning authorities to have regard to emerging RSS (paragraph 53), although that is primarily in the context of preparing Local Development Documents, and does not change existing requirements. In any event, the annual District housing requirement proposed in the South East Plan (522 dwellings per annum) is not substantially above the

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			annual Structure Plan requirement (486 dwellings per annum) and would not come into force at least until 2008, when the RSS is due to be adopted. It is worth noting that, if completions at West of Waterlooville MDA are less than anticipated within the current 5 year monitoring period (as many respondents argue they will be), the effect will be that it will deliver more completions in future 5-year monitoring periods. Future Assessments are, therefore, likely to show an increasingly large contribution from the MDA, which may well offset any future increase in the strategic requirement.
Taylor Woodrow Developments	General	The terms of reference of the Assessment are too narrow and fail to recognise the importance of Local Reserve Sites in the context of longer term requirements. The Examination In Public into the South East Plan is ongoing and it is likely that the total provision will be raised, resulting in increased sub-regional requirements for South Hampshire. Any search for additional sites should start with the Local Reserve Sites.	·
Mrs Payne (Late representation)	Pitt Manor site	Given the level of shortfall, the sustainability of the site and the need to provide affordable dwellings, the Local Reserve Site at Pitt Manor should be considered as a first priority for release (site appraisal and masterplan attached to representation).	It is concluded that there is not expected to be a shortfall (see responses above) and that the risk of this occurring does not warrant the release of any LRSs at the present time.
Redrow Homes	Francis Gardens site	There is a shortfall of 161 dwellings which is sufficient to release one or more of the Local Reserve Sites. The Francis Gardens site should be first in the hierarchy of sites to be released, due to the merits identified by the Local Plan Inspector.	responses above) and that the risk of this occurring does not warrant the release of any LRSs at the present time.
M Tombs	Francis Gardens site	been new development off London	The adequacy of the road network is taken into account when determining any planning application, including the schemes referred to at Kings Worthy. Clearly the schemes which were permitted have

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		increased traffic levels on Worthy Road. Also, development of the Francis Gardens site would not fit well with the recent acquisition by the Wildlife Trust of the adjacent nature reserve.	need to follow the same process. It is unlikely that these schemes will have increased traffic so much as to prevent access being gained to
			The land adjoining the site was a designated Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) at the time the Francis Gardens site was allocated and an 'appropriate assessment' of the potential impact of development was carried out, in consultation with English Nature. The acquisition of land by the Wildlife Trust does not, therefore, raise new issues.
			Therefore the issues raised do not warrant a re-examination of the Local Plan's allocation of the Francis Gardens site as a Local Reserve Site and the consultation was not about the merits of the allocation.
D Jones	Francis Gardens site	Welcome the conclusion that there is no need to develop the site. However, since the Local Plan Inquiry there has been new development off London Road, Kings Worthy which has increased traffic levels on Worthy Road. Traffic entering and leaving the site would have to use Francis Gardens which is a particular concern for residents. Would object if next year's review proposes the release of the site.	The adequacy of the road network is taken into account when determining any planning application, including the schemes referred to at Kings Worthy. Clearly the schemes which were permitted have been found acceptable and any application at Francis Gardens would need to follow the same process. It is unlikely that these schemes will have increased traffic so much as to prevent access being gained to the Francis Gardens site but this would need to be tested if and when an application is made. Therefore the issues raised do not warrant a re-examination of the Local Plan's allocation of the Francis Gardens site as a Local Reserve Site and the consultation was not about the merits of the allocation.
Taylor Woodrow Developments	Little Frenchies Field site	The Little Frenchies Field site is the only Local Reserve Site in South Hampshire. The Assessment and the South East Plan suggest that within the next 12 months the Council must actively consider appropriate measures (e.g. a development brief) to bring the site forward.	It is concluded that there is not expected to be a shortfall (see responses above) and that the risk of this occurring does not warrant the release of any LRSs at the present time.
Denmead Parish Council	Little Frenchies Field site	The report clearly indicates that Local Reserve Sites should not be required for the lifetime of the Local Plan and	The conclusion that there is an 'over-supply' relates to the situation at a specific point in time. One or more of the sites could be needed in future and several respondents argue that they already are. The need

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		beyond. Local Reserve Sites were never necessary and the status of Little Frenchies Field should be altered to Public Open Space. This would provide much needed open space and help to resolve the shortfall identified in the Open Space Strategy.	for recreational space was taken into account when the site was allocated and this consultation was not about the merits of the allocation. Re-allocation of the site would require a formal amendment to the Local Plan Review which, even if possible under the new planning system, would considerably delay work on the Local Development Framework. This in itself could cause housing land supply problems and may, therefore, make it more likely that the site would need to be released.
Denmead Village Association	Little Frenchies Field site	Pleased to read the conclusion at paragraph 6.1 that there is likely to be an 'over-supply' of housing of 26% - 62%. Denmead needs more recreation space and Little Frenchies Field is ideal for new playing fields.	See response to Denmead Parish Council above.
Alresford Town Partnership Housing Group	Spring Gardens site	Housing needs are one of the priorities for the partnership and a housing needs survey is planned. Spring Gardens reserve site is a major opportunity for affordable housing development and should be considered for release in line with the Inspector's comments on prioritising local needs.	See also the response to Winchester Housing Board above. This concludes that it would not be appropriate to release the site on the basis of affordable housing need, when it is overall housing provision that is the trigger in Local Plan Policy H.2 and the associated SPD. It may, however, be possible for the site to be brought forward as an 'exception' site under Local Plan Policy H.6, provided all the relevant criteria are met.
D W Goodman	Spring Gardens site	Don't disagree with conclusions for Spring Gardens on capacity grounds but there is a need for affordable housing for people with links to Alresford. The Town Partnership Housing Group will be considering this issue and a consideration is whether this site could be developed on an exception basis.	· · · · · · · · · · · · · · · · · · ·

Respondents:

Hampshire County Council Environment Department The Castle Winchester

KMA Consultancy 26 Chapel Street Chichester West Sussex

Miss M Tombs 24 Francis Gardens Winchester

Ms D Jones 26 Francis Gardens Winchester

Environment Agency Colvedene Court Wessex Business Park Colden Common

Winchester Housing Board c/o A2 Winchester 33 Staple Gardens Winchester

WCC Labour Group c/o Cllr P Rees White Roses 20 Monarch Way Winchester Mr D W Goodman Wycliffe Cottage Arlebury Park Barns Alresford

Alresford Town Partnership Housing Group c/o Ms D Wooldridge 22 Shepherds Down Alresford

Denmead Parish Council Parish Council Office The Old School School Lane Denmead

Mr J Hayter Gilberts Knapp Beeches Hill Bishops Waltham

Redrow Homes (Southern) Ltd c/o Woolf Bond Planning The Mitfords Basingstoke Road Three Mile Cross Reading

Taylor Woodrow Developments Ltd c/o White Young & Green The Loft St Clair's Farm Wickham Road Droxford Cala Homes c/o RPS Planning 155 Aztec West Almondsbury Bristol

Mrs Payne c/o Turley Associates Brunswick House 8-13 Brunswick Place Southampton

Denmead Village Association c/o Mrs G C Clarke 8 Anthill Close Denmead