

Appendix 2: Methodology Consultation Analysis

| Question | No of Responses | Key Themes | Analysis and officer comment |
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| <p>Q1: Do you agree with the threshold of sites capable of delivering 5 or more dwellings or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above?</p> | 33 | <p>Smaller sites always relevant. Single standard not appropriate need to reflect town or rural areas. Should be at least 10. Should allow for single infill. Consideration should be given to minerals and waste and safeguarded sites need to be taken into account. Sites of less than 5 might be more deliverable. Should be split as per the NPPF with thresholds of under 1 hectare and over 1 hectare. All sites within settlement boundaries or brownfield sites should be identified and allocated.</p> | <p>Responses indicate a general acceptance of the threshold currently used, but there is also interest in exploring if the threshold could be reduced to allow for small sites to come forward which would be in compliance with the revised NPPF – this states that 10% of a districts housing requirement should be achieved on sites of under 1 hectare. This would be a way of identifying these sites which would normally come forward as windfalls. Identifying all sites within settlement boundaries or brownfield sites may not be achievable, it will still be necessary for sites to be suitable and available and there will be some sites that have not been promoted through the SHELAA.. The SHELAA will rely on sites being promoted rather than being actively sought by the Council.</p> |
| <p>Q2: Should the SHELAA be looking at sites smaller than this threshold as the proposed changes in the NPPF promotes the allocation of small sites (under 0.5 hectare)? Is it necessary / realistic to allocate sites of this size?</p> | 32 | <p>Small sites should be allocated particularly in rural areas. Should be looking at one offs and self builds. Sites should be split as per NPPF and under 1 hectare and over 1 hectare. Allocating small sites would encourage SME's rather than relying on national house builders. Allocating small sites will help the Council meet its 10% small sites allocation specified in the</p> | <p>Given revised guidance in the NPPF it is pertinent to explore small sites and the likely yield that could be achieved, across the District in both urban and rural areas. It is suggested that a “call for sites” is initiated as part of the local plan process. This would identify sites for assessment towards the 10% target set in the NPPF.</p> |

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| | | <p>NPPF. Given the likely small number of sites in this category it might be a disproportionate amount of work to allocate them. Unrealistic to expect a development plan to allocate sites which would ordinarily be considered as windfall and subject to criteria based policies.</p> | <p>It is likely to be unrealistic to try to allocate all small sites, particularly for single dwellings. They will continue to be best dealt with by way of windfalls under the criteria based policies.</p> |
| <p>Q3: Do you feel the Densities used in the previous SHLAA are suitable (ranging from 30 dwellings per hectare in rural areas to 75 dwellings per hectare in Winchester town center) given that the proposed changes in the NPPF promote higher densities?</p> | <p>34</p> | <p>These densities have worked well in Winchester. Prefer these densities to overcrowding supported by government. Shouldn't be prescriptive, higher densities work well in some cases in rural areas and vice versa. Higher density must not result in smaller houses, less open space, too many cars. 30dph should be a minimum to avoid wasting land. Need to accord with NPPF to be given weight. Winchester City Council is aiming at providing smaller 2 and 3 bedroom housing which will equate to increase in density as well as meeting local demand. Blanket density not helpful, each site should be considered on its own merits. Densities should be optimised in sustainable locations. Need to ensure good use of land. Density is an artificial numerical position high densities might not be achievable in reality unless the development is for flats. Density should be set taking into account the accessibility and potential of different areas.</p> | <p>There is some criticism of using a blanket density approach; however the basis of the SHELAA is to undertake a high level site assessment. Therefore as this is the first stage of a more detailed site assessment process pending allocation, if required and appropriate, it is considered reasonable to apply some broad density ranges.</p> <p>The NPPF requires good use to be made of land, , However, the ranges applied through the SHELAA, reflect general densities occurring across the different parts of the District and it is not considered necessary for these to be amended at this stage</p> |

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| <p>Q4: If not what densities do you feel would be more appropriate?</p> | <p>20</p> | <p>No more than 10dph in rural areas. Should ask for 75dph in rural areas where there is more space. Density needs to reflect the context. Lower density than 75dph might be more appropriate for Winchester. Blanket density should not be used.</p> | <p>Opinions vary between wanting much higher densities in rural areas and wanting very low ones. Low densities would not make best use of land which is a valuable resource and would not be NPPF compliant</p> <p>Given the role of the SHELLA as an initial site assessment it is considered appropriate for the existing broad categories of densities to be retained. It is acknowledged that higher densities could be accommodated on some sites, but this needs more detailed site assessment which is reasonable if the site is deemed to be necessary and suitable for allocation in the local plan.</p> |
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| Question | No of Responses | Key Themes | Analysis and recommended Actions |
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| <p>Q5: How much detail should the SHELAA seek, so as to be sure about the availability and achievability of sites?</p> | <p>30</p> | <p>As much as possible to ensure deliverability. Need to speak to local people as well as developers. Need to know general details of site constraints, drainage, access, heritage assets etc. Need to be clear about landscape, ecology constraints. Too much advance detail might put developers off due to the cost. Amount of information needed could vary site to site. Be clear on ownership. Legal / financial constraints. Give priority to brownfield sites. Written confirmation from the landowner that the</p> | <p>There needs to be a balance between getting enough information up front to ensure that the sites being promoted and which may potentially be allocated can actually be delivered against putting the prospective developer to too much expense too early in the process. The SHELAA already asks questions about land ownership, consent to develop and timescales for development as well as questions which should identify any major constraints which could affect deliverability and it is considered that this level of investigation is appropriate. However, it is acknowledged that if sites are considered for potential allocation then further details would be required to particularly ensure that the site will be brought forward in the timescales indicated and that</p> |

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| | | <p>site is available for development should be included in the SHELAA. Could also include legal title papers and technical information relating to constraints and opportunities. Suggest NPPF criteria be used as follows;</p> <ul style="list-style-type: none"> ○ Site location ○ Suggested potential type of development ○ The scale of development ○ Constraints to development. <p>Should favour sites whose owners are willing to submit information over those who don't. Essential to get enough information to ensure that sites that area allocated are delivered otherwise the Council will not have sufficient housing. Developers who put sites forward must have the permission of the landowner. Need enough evidence to ensure that sites can be viably developed within the timescale envisaged.</p> | <p>there are no barriers.</p> <p>It may therefore be necessary to ensure the detail requested in the SHELLA is accurate without making the process too onerous. The viability of allocated sites will now be part of the plan making process as required by the NPPF. This may require further amendments to data collected through the SHELAA to ensure sites with potential viability issues are highlighted at this stage to ensure further investigations are made to enable the site to be delivered if allocated.</p> |
| <p>Q6: What do you feel has the biggest impact on viability of development in the district, from a developer's viewpoint?</p> | <p>30</p> | <p>Infrastructure costs and affordable housing. Planning policies. Local opposition. Delays in planning process. Environmental impacts. Prohibitive land costs. Contaminated land. Cost relative to end value. CIL costs Inflexible approach to approving materials and insisting on high quality expensive ones. Unrealistic profit margins.</p> | <p>The main issues appear to be around the costs associated with development such as S106 contribution requirements, CIL, affordable housing requirements and other environmental mitigation measures. As viability is now required at the plan making stage rather than with planning applications it should be clear to developers and the council what costs are going to be associated with developing a particular site. The purpose of this is to avoid proposals proceeding to the planning application stage without all detailed costings involved and then recognition that the site would not be viable.</p> |

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| | | <p>Should be concessions to incentivise developers to provide the type of housing needed especially if it is not the most profitable to the developer. Mitigation. Lack of certainty from Council about timeframes for decisions, conditions approval and planning obligations. Restrictive land use allocations on sites which doesn't allow for market changes.</p> | <p>Concerns over timeframes for getting planning permission, approval of conditions and completion of legal agreements are all things that are being considered by the Council and improved upon as resources allow. Legislation has changed recently and pre commencement conditions can only be imposed if the Council has the written consent of the developer so that part of delays to the process should be improved. The prohibitive cost of land is not something that the planning process can control as it is down to market forces. Paying over the market price for land can no longer be factored into viability assessments which may help developer negotiations with land owners The issue of restrictive land use allocations is more complicated, the purpose of the local plan is to provide certainty and this is also expected by local communities. If allocated sites are not delivered then it will be necessary through the local plan process to reconsider the site.</p> |
| <p>Q7: How could these be overcome?</p> | <p>26</p> | <p>Reduce affordable housing. Revise the Local Plan with clear objectives to 2035. Improve connectivity, servicing and access in urban areas to avoid losing existing uses from centres. Allow for increased numbers of smaller sites and self builds. Decisive priorities. Don't permit development which doesn't accord with the local plan. Review past and present SHELAAs. Financial contributions should be part of the pre app service so that costs are known. Consider getting rid of CIL. Reduce profit margins.</p> | <p>The main thrust of these comments seems to be to reduce or remove the need for developers to provide the things that are significant costs such as affordable housing, infrastructure and CIL whilst increasing incentives and providing concessions for certain types of development. Given the level of affordable housing need across the District, the Council will not be looking to reduce the amount of affordable housing being required, although it will assess the implications for viability. Changes to CIL regulations are being considered by Government and indeed it will be necessary for the Council to review its charging schedule in due course. CIL as a means of collecting monies to fund</p> |

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| | | <p>Provide concessions for building bungalows. Tax vacant building land. Build new towns with the appropriate infrastructure. Use viability assessments. Utilise central government funds for infrastructure to help to unlock sites for development. Have a long term view of the wider benefits for Winchester resulting from development.</p> | <p>infrastructure is expected to remain and replaces some other previous contributions.</p> <p>Through the local plan process it will be necessary for the Council to be clear about development costs when allocating sites through viability assessments</p> <p>Preparation of the local plan also provides the opportunity to update the Infrastructure Delivery Plan.</p> |
| <p>Q8: How should the SHELAA deal with 'broad locations'?</p> | <p>23</p> | <p>Allocate sites for development in accordance with NPPF. Development should be located within and directly adjacent to existing settlement boundaries in the first instance with other sites being considered on their merits. Local people through their elected council should decide where development should go not be forced to accept developers choices. Need to jointly plan with neighbouring authorities. Take into account needs of home workers not all employment takes place in employment centres. SHELAA should look to address the following tenures;</p> <ul style="list-style-type: none"> ○ Open market housing based on SHMA ○ Private rented ○ Affordable housing ○ Self / custom build ○ C2 care housing for older people. <p>Research future potential urban and rural growth areas. Broad locations should not constrain the delivery of sites outside these locations.</p> | <p>The revised NPPF suggests having strategic level priorities with the identification of broad locations for growth. However, this will depend on the level of housing need identified and at this stage the Government has acknowledged that it will review the standardised methodology for calculating need. So whilst this concept may be acceptable, without knowing the potential quantum of development it creates an element of uncertainty.</p> <p>What is clear from the many sites submitted through the SHELLA, is that these predominantly about existing settlements with a focus around the larger settlements identified in existing adopted local plans. Through consultation on the launch of Local Plan 2036 there is some support for the existing spatial strategy to be retained; this provides a useful starting point to consider a potential development strategy looking ahead to 2036.</p> <p>The SHELAA therefore offers a number of sites for consideration, pending clarification of the District housing need which will influence the sites to be considered further.</p> |

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| | | <p>Broad locations should not always be within settlement boundaries. Sites need to be specifically identified so that communities can assess the impact. Where broad locations are identified the potential quantity of housing should be stated to provide guidance to developers. Spatial strategy of the local plan should be the starting point. Focus on brownfield sites. Additional development could be allowed adjacent to small towns / villages to ensure local services and facilities are maintained and to improve affordability.</p> | |
| <p>Q9: Do you have any comments or suggestions on the assessments of windfall used in the District and whether these provide the robust evidence base sought by the NPPF?</p> | <p>25</p> | <p>These are only a limited number of sites. Windfalls tend to be underestimated and can lead to pressure on local services and infrastructure. Windfalls welcome but should encourage more self builds in rural areas. Need to assess likely numbers of windfalls based on previous years. All windfalls should be included and considered. Emphasis should be on allocated and planned sites rather than windfalls. Relying on windfalls on previous industrial/commercial land is contrary to the Solent Enterprise Partnerships aim of supporting existing businesses. This should be reconsidered in the new local plan. Windfall can only be counted in years 4+ of the plan period to avoid double counting.</p> | <p>As part of the preparation of the adopted local plans and indeed to inform local plan 2036 the Council is examining the number of sites that have come forward that would fall into this category. This data when completed will provide a robust assessment of potential sources and will inform whether the Council should include an allowance for windfall provision as suggested in the NPPF.</p> <p>All windfalls contribute to completion records and indeed maintaining a five year supply, but by their nature are not allocated in local plans. It is likely that most sites of 5 and less will remain as windfalls. The only exceptions might come about as a result if the upcoming “call for small sites” which will be carried out next year to help the council meet the target of 10% of housing on small sites required by the NPPF. It may be possible that some more rural sites</p> |

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| | | <p>Sites of 5 and less should remain as windfalls. AMR and historic trends should be the starting point for assessing windfalls. WCC have adopted a realistic level for the number of windfall sites and this should be carried forward.</p> | <p>become identified or indeed those sites suitable for self build. WCC will continue to use the AMR as a guide to numbers of windfalls that can realistically be expected. In respect of the SEP aim of supporting local businesses, land will only usually be lost to another use where it can be proven that it is no longer needed for its original use.</p> |
| <p>Q10: The number of homes needed will be determined by the Government's 'Standard Methodology' for assessing local housing and sites will be assessed to meet these needs. The Council must still assess the need for different types, sizes and tenures of housing - do you have any comments on these matters?</p> | <p>30</p> | <p>Need for mixed housing. Great need for rented in all communities. Need to provide all types, sizes and tenures across the district to achieve a balanced community. 80% of housing provided should be affordable. Greatest need is for cheap housing for families and local young people not incomers and students. Need transparent public updates on what is going to be provided. Local Lettings Plans for all communities outside the city. Build starter homes. Housing for the elderly. Build Council housing. Housing for social care needs. Increase self build and impose delivery time. Standard Methodology needs to be adapted to deal with the fact that nearly half of WCC is within the National Park. More over 55's development to free up family homes. Plans should include allowances for retirement homes to allow generations of families to live apart but close together.</p> | <p>A main area of concern is the lack of housing being provided to meet the needs of the elderly population. WCC will continue to assess the housing needs of its population and will take into account any unmet need that arises. It will be necessary to commission a Strategic Housing Market Assessment to examine in detail the needs of the district looking ahead to 2036 – this will include the aging population, students, families etc. A balance needs to be struck between providing as much affordable housing as possible to meet identified needs, but without making development unviable and therefore undeliverable. The council has embarked upon an ambitious direct delivery programme where it is not only developing its own land but also exploring purchasing sites to deliver much needed affordable homes. The NPPF is clear on the sectors of housing that need to be addressed in assessing housing need and WCC will be obliged to do that as well as responding to the findings in the housing needs survey. The principle of a rural exceptions policy is retained in the revised NPPF.</p> |

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| | | <p>Address the needs of those who still live with their parents.</p> <p>Widen definition of affordable housing. The market will always seek to deliver housing to meet demand and doesn't need artificial intervention from planning policy to achieve this.</p> <p>Rural exceptions housing should be supported.</p> <p>Main local need is for 2/3 bedroom housing and this should guide development.</p> <p>Council should recognise the role of the LEP and the need to factor in economic growth needs in the setting of its housing targets.</p> <p>Undertake housing needs survey.</p> | |
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| <p>Q11: Are there any measures that can be taken to help ensure that allocated sites are developed at the rate planned, rather than too quickly or too slowly?</p> | 29 | <p>Use specific implementation planning conditions.</p> <p>Fiscal fines should be imposed on developers who don't finalise schemes.</p> <p>Ensure no onerous pre commencement conditions.</p> <p>Tax on gains in value of undeveloped land with planning permission.</p> <p>Staggered release of planning permission (phases).</p> <p>Allow a maximum allocation of homes to be developed in any one year, spread over the plan period.</p> <p>Small developments easier to monitor.</p> <p>Use bond against number of properties built.</p> <p>Make trajectory part of the permission with penalties for slow build out.</p> <p>Make anticipated rate of development part of the</p> | <p>Many of the comments reflect the messages now contained in the revised NPPF with a focus on small and medium sites, changes to pre-commencement conditions, and sub division of larger sites.</p> <p>Responses identified imposing timescales on developers and having financial penalties if they are not adhered to. Also supporting smaller developments which are likely to come forward faster.</p> <p>This is something that could potentially be achieved through both the local plan and development management process. It is possible to have a bespoke time limit on applications to require a quicker start. It would also be possible with the developer's agreement to have a legal agreement or condition which specified the rate of built out on a site which would then be possible for the Council to</p> |

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| | | <p>allocation in the local plan. Sites included in the local plan should be updated on a monthly basis. Sub divide sites to several developers. Do not be overly reliant on large sites. Consider allocating reserve sites which could be developed if allocated sites fail to deliver. Have clear evidence that sites are deliverable. Allocate a quantum of development above the minimum to ensure deliverability. Use incentives. This is a function of the housing market rather than planning control. Agree phased build out with developer as part of the plan. Forfeit planning permissions which are not being built out. Dedicated resource at Council to assist in delivering allocated sites.</p> | <p>enforce against should they need to. It would also be possible to specify phasing / timing as part of the allocations policy in the local plan. However, the powers available to the Council to control these matters are limited and the sanctions available will tend to delay or halt development rather than speed it up. Have a dedicated resource at the Council to assist in delivering allocated sites is suggested, this is covered through the use of implementation officers on the strategic allocations as part of the consent requires developers to fund a monitoring and implementation team who ensure that the strategic sites build out in accordance with the anticipated timetable. It may be possible to extend the use of implementation officers to larger non-strategic sites.</p> |
| <p>Q12: The SHELAA will provide evidence for the Local Plan 2036 and the Local Plan process will test the suitability and availability of sites. Housing delivery will be monitored to maintain a 5-year supply of housing sites. Do you have any comments or suggestions to help ensure the allocated sites are delivered at the</p> | <p>24</p> | <p>Ensure sites are identified early enough. Allow other developers to move in and provide houses where allocated sites are not doing so. Consider using stock of existing under utilised buildings as well as new builds. If sites are not brought forward within 5 years then they should be deallocated. Use financial penalties for under provision. Consider undertaking archaeological and heritage assessments prior to allocation to avoid unforeseen delays. Don't allow land banking.</p> | <p>It has been suggested that regular meetings between the council and developers could help to keep allocated sites on track and give early warning of any issues that might affect deliverability. This is something that the council could do as part of its monitoring process although some thought would need to be given to the regularity of meetings given the resources available to the council. It is suggested that sites with planning permission / allocated sites be deallocated if they are not brought forward within 5 years. This is something that the council could explore when reviewing local plans. It</p> |

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| <p>planned times? What measures could be taken to correct the situation if they aren't?</p> | | <p>Clear commitment to speedy responses from County and City level, they can take too long. Build infrastructure upfront so it won't delay housing delivery. Small sites consider using an enforcement bond as financial penalty. Monitor planning permissions to ensure they are commenced before they expire. Have regular meetings with promoters and developers to ensure delivery is going according to plan. This council is over reliant on large sites and is underproviding houses. Use reserve sites to make up shortfalls. Need to know the reasons why sites are not being built out. Don't allow front loading of development. Planning permissions should not be granted until the plan is adopted. Need to ask the right questions. What is the best way to ensure that housing is supplied in the right areas? Public do not want large scale developments with inadequate infrastructure. Council should consider an action plan. Move away from single use allocations.</p> | <p>is proposed to do a stock check of all sites with planning permissions which have not yet commenced and ask the developer the reason why. If it becomes clear that the site cannot be developed then it could be removed from the local plan allocation.</p> |
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