



THAKEHAM

Planning Policy Team
Winchester City Council
City Offices
Colbrook Street
Winchester
SO23 9LJ

13 October 2024

Dear Sir/Madam

**Winchester District Local Plan 2020 - 2040: Regulation 19 Consultation
Land at Paddock View, Littleton
Thakeham Homes Limited**

Introduction

These representations have been prepared by Thakeham Homes Limited ('Thakeham') in relation to the Winchester Local Plan 2020 – 2040 Regulation 19 Consultation ("the Consultation") and supporting evidence. We are writing to set out our concerns to the Draft Local Plan as we do not believe it can be found legally 'Sound' in its current form.

Thakeham has an interest in Land at Paddock View, Littleton (SHELAA references: Site ID LH04 - Land to the rear of Paddock View), hereinafter referred to as 'the Site' and these representations specifically make reference to our Site in the context of the Consultation and evidence base. The Site was found to be suitable, deliverable, developable and available in the 2019, 2020, 2021 and 2023 SHELAA reports and therefore should be identified as an allocation within the emerging Local Plan.

About Thakeham

Thakeham is an infrastructure-led sustainable placemaker and is committed to creating new, extraordinary places, where the highest attention to detail makes a positive difference.

Thakeham build for the future, for communities and for individuals. Our approach sets us apart from our competitors. We deliver our schemes with a focus on net zero carbon sustainable development, looking ahead of current housing standards. We are also supporting the industry in the charge towards Net Zero Carbon as part of the Future Homes Hub. We have recently partnered with Octopus Energy to deliver 'zero bills' homes at our Templegate site in Sussex. These homes feature additional solar panels, air source heat pumps, and a battery – enabling customers to live in a comfortable, warm home with no energy bills for at least five years. Following the success of this, we have now committed to this 'zero bills' pledge across all our new developments going forwards

All Thakeham developments consider the potential for incorporating sustainable energy features, including air source heat pumps, solar PV panels with links for battery storage, renewable energy tariffs, and highly efficient heating and hot water systems as well as wastewater recycling measures, ensuring all our homes are as sustainable as possible for all our residents.

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Furthermore, Thakeham’s sustainability approach is not just focussed on the final buildings, but starts with our approach to the whole construction process, including:

- Following industry best-practice by taking a ‘fabric first approach’, which looks at how design and materials can contribute to the energy performance of the completed building.
- Thakeham uses a UK-based factory which manufactures panels using timber from sustainable sources. The off-site panelised system improves efficiency, speed of construction, quality, and reduces carbon emissions.
- Our Sustainable Procurement Policy encourages the use of recycled materials, such as otherwise nonrecyclable waste plastics (one tonne of MacRebur mix contains the equivalent of 80,000 plastic bottles), as well as utilise products part of a circular economy.
- We ensure that our whole supply chain is as local as possible. We have gold membership with the Supply Chain Sustainability School.
- On site, we monitor and aim to minimise construction travel emissions, construction waste and energy consumption and are registered with the Considerate Constructors Scheme.

Our approach sets us apart from our competitors. We deliver our schemes with a focus on sustainable development, looking ahead of current housing standards.

Our Proposal

Our Proposal is for a sustainable new Net Zero Carbon development that will deliver circa 125 homes, including policy compliant affordable housing as well as play space, open spaces – including allotments, orchard and wildflower meadow, a new farm shop and associated on-site infrastructure as illustrated in our Vision Document.

Our Site is in a sustainable location on the edge of Littleton, benefitting from good links to bus services, pedestrian and cycle links ensuring it can be a sustainable location. The Site is well screened to the east ensuring there would be no visual impact on the Conservation Area, whilst also providing new landscaped areas. Accordingly, we believe it should be included in the Submission Plan as an allocated Site for residential development.

Duty to Cooperate

As part of the Duty to Co-operate the Council has stated the unmet need requirements are based on calculations agreed at Table 1 in the Partnership for South Hampshire Spatial Position Statement 2023. The Table is included below for reference:

Local Authority	Annual Housing Need using Standard Method (dpa)	Total housing need 2023 – 2036	Identified Supply = Commitments, local plan allocations + windfall estimate	Shortfall/ surplus
East Hants (part)	113	1,469	1,275	-194
Eastleigh	667	8,671	6,160	-2,511
Fareham	541	7,033	9,356	+900

Gosport	353	4,589	2,518	-2,071
Havant	516	6,708	4,105	-2,603
New Forest	1,056	13,278	8,076	-5,652
Portsmouth	899	11,687	11,304	-383
Southampton	1,475	19,175	15,951	0
Test Valley (part)	182	2,366	3,109	+743
Winchester (part)	235	3,055	3,055	0
Total	6,037	78,481	64,909	-11,771

Whilst we do not disagree with the commitment or methodology of the calculations, there are three concerns with the proposed approach:

1. The calculations only cover a period between 2023 and 2036, while the Local Plan period runs to 2040, meaning there is a shortfall in delivering unmet need across the whole Plan and four additional years should be added (using current SM figures of 235 this would result in an **increase of 940 dwellings** to be accounted for in the Winchester plan period).
2. The proposed totals at Table 1 total need, identified supply and shortfall calculations are all incorrect. The total need is actually 78,031 (450 reduction); supply is 61,854 (3,055 less) and the shortfall is 11,321 (a **reduction of 450 dwellings**).
3. This is based on the current NPPF and standard method. As the Council will be aware, the emerging NPPF includes a new proposed Standard Method, which will see all the relevant authorities housing need increases from 6,037 dpa to 7,815 dpa. This means the annual requirement for South Hampshire region increases from 78,031 to 101, 595 between 2023 and 2036 (**23,564 housing need increase**).

Given this will have fundamental impact on the local plan and whether the Council can meet its housing needs in full, this needs to be addressed prior to submission. If the council choose not to address this issue it would be a failure to co-operate effectively on a key cross border or strategic issue and the plan would not be legally compliant with the S33A(1) of the Planning and Compulsory Act (2004).

Local Plan Period

The proposed plan period of 2020 to 2040 is no longer an appropriate Plan period for strategic policies.

Firstly, given the delays preparing the Plan, it will not extend for more than 15 years from the point at which the plan is adopted, as required by paragraph 22 of the NPPF. The timetable to adoption, following closure of the Reg 19 consultation in October 2024, is:

- Reg 22 – Submission to SoS: February 2025
- Reg 24 – Examination in Public: June – September 2025
- Reg 25 – Main modifications: October 2025 – March 2026

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- Inspector's Final Report: April 2026
- Reg 26 – Adoption: May 2026

If the Council adopt the local plan by May 2026, then the plan period will need to be extended to 2041 to ensure that there is at least 15 years remaining post adoption.

Secondly, it is considered unsound to have a plan period that commences in 2020 which will be around five years prior to the point at which the plan is submitted. In considering the plan period it is important to recognise that local plans are meant to look forward at would needs to be delivered not look back at what has happened. This is clear from paragraph 2a-005 notes that when setting the baseline for the standard method the current year is used as the starting point for calculating growth. The Standard Method also requires the affordability adjustment to be the most recent data, for the case of Winchester this means using the median affordability ratio for 2023 that was published in March 2024. This adjustment is to reflect the price signals in the market and ensure that housing needs are responding to these signals and suggests that the starting point for any plan should be the year to which the affordability ratio relates.

In order to be consistent with national policy and as such sound the Council should amend the plan period to start in 2023/24 and end in 2040/41.

Policy H1: Housing Provision

Table H1 at paragraph 9.14 sets the Housing Need using Standard Method from 2024 as 676, with total sixteen-year requirement to 2040 as 10,816. However, as set out above, the Plan should be extended to at least 2041 to ensure the Plan period covers at least 15 years and so a further 676 dwellings must be identified in the Plan to ensure it is in accordance with Paragraph 22 of the NPPF, or the Plan cannot be found sound.

Furthermore, Annex 1 of the emerging NPPF sets out transitional arrangement for Local Plans and suggests that even if the Plan is submitted under paragraph 226c, given the annual housing requirement will be 343 dwellings lower than the new Local Housing Need figure, there will be a requirement to undertake an immediate Review of the Plan to accommodate the minimum 2,145 dwelling shortfall.

In light of the short plan period, and the need to ensure the Plan accords with the emerging annual housing need, it is recommended that the Council identify new housing allocations to cover the additional 2,821 need (676 additional year + 2,145 new SM).

Accordingly, it would be more appropriate for the Plan to seek to meet these needs now, avoiding the need for a review.

The current approach to housing delivery is unsound as it fails to meet housing needs in full without providing adequate justification to support its approach. The Council must revisit the housing need across the plan period prior to submission to consider options for meeting needs in full to facilitate the delivery of new homes.

Strategic Policy H5: Meeting Housing Need

Thakeham supports the general housing mix, and the accessible and adaptable requirements set out in this Policy.

However, we do not believe the proposed requirement to deliver 6% self-build and custom build housing on sites over 50 dwellings is reasonable. Looking at the Site allocations within the emerging Plan, this would require delivery of 570 self or custom build homes.

Given the latest published information states there are currently only 26 active individuals on the Council's self-build register, this suggests there is no real demand for self or custom build here.

It is therefore clear that a requirement for 6% across all sites over 50 dwellings would be a significant over-supply and detrimental to delivery of other more needed housing types.

Policy H6: Affordable Housing

Thakeham wholly supports the Council's target percentage requirement of 40% of new housing development to be affordable housing.

It is noted that the policy also sets out the tenure split as 35% low-cost ownership and 65% social rented. Whilst Thakeham supports an appropriate mix of tenures in all our developments, this should not be a definitive requirement and should be based on evidenced local needs in Littleton.

Therefore, the wording should be amended to "For market led housing schemes, the affordable housing should, ***subject to current need***, be provided in accordance with the following proportions:"

Policy E3: Biodiversity Net Gain

The emerging policy target of 10% BNG is in accordance with Government guidance published in February 2024, which states that "... *plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain*".

Thakeham wholly supports the delivery of BNG, and the proposed requirement to deliver a policy that is completely aligned with the Environment Act, which will ensure consistency and avoid confusion.

It should be noted that Thakeham is already committed to the delivery of at least 10% biodiversity net gain across all development sites and would support the policy requirement for delivery of 10% biodiversity net gain, to ensure protection and growth of biodiversity across Winchester both now and for the future.

Additionally, it is important to recognise that some habitat creation, such as hedgehog highways and swift bricks (both delivered as standard by Thakeham) do not add to the calculation of BNG but make an important contribution to ecology. As such, it is possible to deliver 10% BNG as well as additional ecological enhancements.

Land at Paddock View, Littleton

Our Site is within a sustainable edge-of-settlement location, directly adjacent to existing residential areas. The Strategic Housing and Economic Land Availability Assessment, which considered the Site in 2019, 2020, 2021 and 2023 under site reference LH04, concluded on all four occasions that the site is deemed deliverable, developable and available in accordance with NPPG. Furthermore, the suitability assessment confirmed that against the 24 environmental, physical, historic and policy constraints, Paddock View had no red and only 4 amber constraints.

It should be noted that the assessment has concluded the Sir John Moore Barracks, which has been identified for development in the Plan, has six (6) amber constraints, against the SHELAA assessment and will result in coalescence between Littleton and Harestock. Despite the assessment, the Council have draft allocated this site, with poorer performance against these criteria, suggesting they are not adhering to guidance set out in the NPPG regarding identification of new development sites.

Accordingly, the Site should therefore be allocated for residential use in the emerging Local Plan to meet the housing needs arising from the extension of the plan period and the current shortfall in provision.

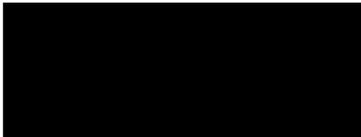
Our Vision Document attached shows how this will be delivered, as well as the landscape-led approach to placemaking, showing how our Site will be a natural extension to Littleton.

Conclusions

We consider that the current Draft Local Plan fails to positively plan for its future housing needs in a sustainable manner. The overall housing provision does not reflect the existing need and it also fails to address the district's significant affordable housing needs. We do not conder the Draft Local Plan to be consistent with national policy, given the multiple conflicts with the polices contained within the NPPF, as highlighted within these representations.

We trust that these representations will be useful and clear, and we would be grateful for confirmation of receipt of our submission. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Yours faithfully,




Associate Planning Director

Appendix 1 – Vision Document