



ALFRED HOMES

## **Hearing Statement**

### **Matter 4: Meeting Housing Need**

**April 2025**



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### 1. The overall supply of housing

Question 5 Policy H2 holds back permissions for new greenfield site allocations until 2030 to prioritise previously developed land, achieve a more even housing trajectory and level of development over the Plan period. What would be the expected impacts on housing land supply, 5 year housing land supply, delivery of a variety of sites and matters such as nutrient mitigation and thereby nutrient neutrality requirements and electricity grid capacity?

Question 6 In the absence of a stepped trajectory would the approach taken by the Council be effective, justified and consistent with national policy to significantly boost the supply of homes (NPPF paragraph 60)?

- 1.1 This section of the Hearing Statement addresses the soundness of Policy H2 and the Phasing of sites post 2030. The section covers multiple reasons why the Policy fails the test of soundness being inconsistent with National Policy and not being justified, which are numbered for ease of reference.

#### No.1 – Local Plan Timeline

- 1.2 As per the transitional arrangements (Para 236 NPPF December 2024), the LPA will commence production of a new Local Plan prior to the adoption of the current Local Plan Review, as shown in the Council's recently published LDS.
- 1.3 This new Local Plan will of course plan for an increase in annual housing need of 70.6% over that contained within the current Review, but importantly, is projected to be adopted by 2028.
- 1.4 It is an oddity that Policy H2 and the proposed holding back of deliverable sites until post 2030 has not been amended via a Modification post publication of the revised Standard Methodology and NPPF, given that 2 years prior to the point where the sites are to be released for approval (2030), the LPA will have adopted a new Local Plan that plans for a minimum housing need of 1,157 dwellings per annum, requiring a significant injection of housing delivery at the very time Policy H2 seeks to artificially hold delivery back.



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- 1.5 A Local Plan Policy that seeks to hold back deliverable sites until 2030 is the antithesis of National Policy to boost the supply of new homes and build 1.5m new properties during the current Parliamentary period and thus is inconsistent with National Policy and not justified when considered against the alternative.

### No.2 – A District wide restriction

- 1.6 The LPA advocates that the Phasing is intended to support the delivery of brownfield sites, principally Central Winchester Regeneration Area (Silver Hill), Station Approach and Bar End Depot, with all three owned by the City Council. A critique of the delivery of these sites is set out within Section 2.
- 1.7 All three projects are within the City of Winchester, and yet, the Policy seeks to hold back supply across the District as a whole, including Neighbourhood Plan allocations in New Alresford and Denmead. No assessment has been made of the socio-economic implications of constraining housing delivery in these larger Towns and Villages, nor any analysis of brownfield v's greenfield land availability and the resulting implications of housing delivery.
- 1.8 For Towns such as New Alresford, which for the most part are reliant on Greenfield Sites coming forward to meet its housing requirement in full, an artificial constraint will mean further delay in meeting housing needs locally.
- 1.9 The Inspector will note with regard to New Alresford, the Local Plan Part 1 adopted 12 years ago in 2013, required the delivery of 500 new homes within the Market Town. To deliver this quantum of housing, land east of Sun Lane was allocated for 'about 325 dwellings' and land at the Dean for 'about 75 dwellings' via the Local Part 2 (2017), along with a projection of commitments and a windfall allowance.
- 1.10 While development has progressed at the Dean, much of this is limited to age restricted housing, with the development at Sun Lane only recently commencing.



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- 1.11 As per Paragraph 6.13 of the 2024 Winchester AMR Report (Ref ED03a) (see Figure 1), the recent lack of housing delivery in New Alresford is plainly evident when compared against the other Market Towns, with only 2 new homes completed in New Alresford in the year 2023/24, and some 288 dwellings of the 500 dwellings identified as being needed in the adopted Local Plan still to be delivered.

Figure 1: Housing Distribution across the MTRA Area from LPP2

Settlement	Requirement	Net Completions 01.04.2011 – 31.03.2024	2023-2024	Outstanding
Bishop's Waltham	500	570	43	-70
New Alresford	500	212	2	288
Colden Common	250	208	0	42
King's Worthy	250	200	8	50
Swanmore	250	206	1	44
Waltham Chase	250	219	4	31
Wickham	250	147	68	103
<b>Total</b>	<b>2,250</b>	<b>1,762</b>	<b>126</b>	<b>488</b>

- 1.12 Given only 42% (212 dwellings) of the requirement for New Alresford has been completed in the first 13 years of that Plan Period (2011-2031), this shortfall will only be exacerbated further by artificially restricting the additional 100 dwellings proposed via the Neighbourhood Plan until post 2030.
- 1.13 Moreover, with only one large scale development proposed for the Town in the coming years, holding back the sites to be allocated within the Neighbourhood Plan would significantly hinder choice and competition for the community of New Alresford.

### No.3 Impact on SME Housebuilders

- 1.14 The scale of the allocations being held back are those delivered by local SME housebuilders, such as Alfred Homes. The procurement and holding of these parcels of land is a significant outlay for SME's accounting for hundreds of thousands of pounds of expenditure, which is only exacerbated by artificially holding back the point in time when a grant of consent could be achieved.



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### No.4 – Resulting delay in meeting unmet housing need

- 1.15 As per the PPG (Paragraph: 010 Reference ID: 2a-010-20201216), there is a requirement of the LPA to assess whether the local housing need is greater than the outcome of the Standard Methodology.
- 1.16 While the Local Plan Review is of course being examined under the transitional arrangements of the NPPF (December 2024), the PPG, as revised in 2020 and thus material to this Examination, requires the LPA to pay due regard to such information as it exists today.
- 1.17 As per the Government's response to the proposed reforms to the National Planning Policy Framework consultation (Updated 27<sup>th</sup> February 2025), in response to Question 7, the Government stated that:

*In addition, there are many authorities whose local housing need figures will be substantially larger than their adopted or emerging local plan housing requirement figures, indicating a significant unmet demand for new homes in these areas [my emphasis]. To help close the gap, we are introducing a new requirement that authorities with plans adopted under the old standard method must provide an extra year's worth of homes in their 5-year housing pipeline.<sup>1</sup>*

- 1.18 A 70.6% increase illustrates the extent of the unmet demand for new homes within the District, that the holding back of deliverable sites will worsen.

### No.5 – Maintaining a Housing Land Supply

- 1.19 The LPA's argument that in the absence of Phasing, land supply would fall below a required level of 795 dwellings per annum after 2031/32 (Para 6.8, ED02), ignores completely the reality that by 2028, this Plan and Policy H2 will have been superseded, and the LPA will have an adopted Plan reflecting a housing need of 1,157 dwellings per annum.

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<sup>1</sup> <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/outcome/government-response-to-the-proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system-consultation>



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- 1.20 The effect of the new Standard Methodology has been laid bare in the recent Appeal Decision at School Lane dated 31<sup>st</sup> March 2025 (APP/L1765/W/24/3350662), with the Inspector confirming insufficient supply within the District and the presumption in favour of sustainable development being engaged for decision making (extract provided as Appendix A).
- 1.21 This highlights that ability to proceed to Examination at the reduced housing need level under the former Standard Methodology is only a temporary measure, with the requirement to plan positively to achieve the 1,157 dwellings per annum firmly with the LPA now; a position counter to the Phasing of deliverable sites.
- 1.22 Within its Housing Topic Paper, the LPA is on record in saying that the introduction of the Standard Methodology in 2018 '*reset the clock*' (ED02 Para 3.3) in respect of its historic under supply of -1,599 dwellings in the period 2011-2018. Given the new Standard Methodology is founded upon the number of existing properties within the District, it will have already accounted for the assumed oversupply the Council advocate, and thus the clock will be 're-set' once more as part of the application of the new Standard Methodology. This will further exacerbate the need to plan positively in releasing deliverable sites now.
- 1.23 In summary, the transitional arrangements are in place to allow Local Plans at an advanced stage to progress to adoption, but part of the transitional arrangement is a requirement for the LPA to progress quickly to a review, and thus, the fact that by 2028 a revised Local Plan will be in place with a significantly higher housing requirement and resulting housing allocations cannot be ignored.
- 1.24 When read as a whole, the transitional arrangements and National Policy would not support a Phasing Policy that seeks to artificially hold back the delivery of deliverable housing sites at a time when National Policy is seeking to boost significantly the supply of new homes to 300,000 per annum nationally.



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### 2. Five year housing land supply

Question 1. Will the Plan provide for a five year supply of specific deliverable housing sites on adoption with specific regard to the definition of deliverable in NPPF annex 2?

Question 2. Which specific sites make up the extant permissions included within the housing trajectory and what is the evidence that they are deliverable as per the NPPF definition?

- 2.1 The section assesses the validity of the LPA's assertions in respect of its 5 Year Housing Land Supply in response to Question 1 and 2 combined. As part of the assessment, the Statement also looks forward to July 2026 in the context of Policy H2 and the Phasing of deliverable sites.

#### E. Existing Local Plan Strategic Allocations

- 2.2 The three principal adopted Local Plan allocations are now well advanced and producing annual completions, and therefore it is just to have projected completions from Newlands, North Whiteley and Kings Barton over the 5 year period. There is however an overestimation of from two of the three Strategic locations.
- 2.3 For Newlands, the Council is projecting housing completions of 120 dwellings per annum in the period 2025 to 2030, compared to an average completion rate of 93 dwellings per annum in the period 2020 to 2024.
- 2.4 The LPA gives no justification why it considers Newlands will increase delivery to 600 completions in the period 2025-2030, when compared to a continuation of the last 4 years. Consequently, the annual delivery for Newlands should reflect recent construction and absorption rates, and be reduced to 93 dwellings per annum, reducing the total by -135 dwellings [600-465 = 135].
- 2.5 Turning to Kings Barton an identical picture emerges, with the LPA advocating the future delivery of 555 dwellings in the period 2025 to 2030 at an average of 111 dwellings, with completions from 2020 to 2024 totalling 350 dwellings, or an average of 88 dpa (rounded).





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- 2.6 In the absence of any justification for the increase, when applying past performance, it is reasonable to assume that there will be 440 dwellings delivered from Kings Barton in the period 2025 – 2030, a reduction of -115 dwellings [555-440 = 115].
- 2.7 In respect of North Whiteley, this is somewhat of an anomaly at present, with Registered Providers purchasing significant quantum of open market housing to provide as affordable and thus benefit from Government Grant. As a consequence, the site continues to yield high levels of completions and thus there is no reason to discount the level within the LPA's assessment.

### H Local Plan 2040 Allocations

- 2.8 The Statement now turns to the three principal Brownfield Sites, namely Central Winchester Regeneration Area (Silver Hill), Station Approach and Bar End Depot, with all three owned by the City Council.
- 2.9 The Silver Hill project represents one of the largest and most complex regeneration projects the City will see in the coming decades, and has been in the making for decades, with multiple false starts, legal challenge and a lack of consensus. The LPA will point to a recent resolution to progress with the project. In response, I would direct the Inspector to the following timeline:

*1996-98 - Study identifies development potential of Broadway-Friarsgate area.*

*2001-04: Thornfield Properties chosen as developer and expands scheme*

*2009: Planning permission granted for Thornfield development*

*2010: Thornfield enters administration. Henderson Global Investors – later known as TH Real Estate – confirmed as new development partner*

*2011-13: Public inquiry into compulsory purchase order*

*2014: Council approves revised application dropping bus station and affordable housing. The decision sparks legal challenge from Conservative councillor Kim Gottlieb.*



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*2015: Cllr Gottlieb wins legal battle as High Court rules the council unlawfully handled the scheme by failing to invite bids from other developers.*

*May - June 2015: TH Real Estate restores 2009 plans, which it says are now viable again, and suggests work could start before 2016*

*December 2015: TH Real Estate writes to council to warn 2009 scheme is unlikely to go ahead before crucial deadlines.*

*2019: Delivery Road Map published – commencement expected in 2021. Fails to materialise.*

*2020-2025 – Consultation with stakeholders and community, with continual delay in commencing the project*

- 2.10 While the intent of the LPA to bring forward the project is not questioned, the notion that such a complex, large scale development will yield 50 completions by March 2030 is unrealistic, not least given that the residential component is largely apartments, which have longer lead in times. In the context of the guidance in the NPPF annex 2, the supply of 50 dwellings from this project should be removed from 5 year period.
- 2.11 Similarly, Station Approach consists of a large scale regeneration project in the City Centre, which is some way off having any form of Planning Application being prepared and lodged for determination. Moreover, it is an oddity that the housing trajectory includes 35 dwellings within the last year of the 5 year period, then a 4 year gap to the next completions by March 2034. One could realistically see the latter occurring, but not the former, given the status of the land, the lack of any meaningful progress in recent times.
- 2.12 Finally, Bar End Depot. The City Council owned land has been marketed since 2021 for a development partner, with no application lodged. Given the scale of the site, it is feasible to see 30 dwellings come forward on the land during the 5 year period, but it is worth highlighting how overly optimistic the LPA has been in the assessment of the delivery from such sites.
- 2.13 The trajectory shows 10 houses being completed in the next 12 month period to 31<sup>st</sup> March 2026, and the remaining 20 by 31<sup>st</sup> March 2027, all while there is no planning application lodged, let alone a development under construction.



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- 2.14 While it is probable that the 30 houses will be delivered by 2030, if nothing else, the LPA's proposed trajectory for this site alone serves as a health warning for the trajectory, particularly those large scale projects that do not benefit from a planning permission in the context of annex 2 of the NPPF.
- 2.15 In summary, based on an assessment of past performance and a realistic view on future timelines of these 6 sites alone, one can justify a reduction of the housing supply of 335 dwellings.
- 2.16 We know that in 15 months' time (July 2026), the additional 20% required by the transitional arrangements will come into force, with Table 6 of the Council's updated Housing Topic Paper (ED02) projecting a 5.7 year supply. Assuming all other parameters remain as proposed by the LPA, this adjustment of 335 dwellings would reduce this position 5.3 years based on the pre 2024 Standard Method and assuming every other housing completion comes forward as projected.
- 2.17 Such a precarious position adds further weight to the abandonment of Policy H2 that seeks to restrict the supply of deliverable sites.



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### 3. Modification required to make the Plan Sound

- 4.1 For the multiple reasons as set out within the Statement, Policy H2 is neither consistent with National Policy, nor justified, when considered against the reasonable alternative, and thus for the Plan to be considered sound the Policy will need to be deleted via a Modification.



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## Appendix A – Extract from Appeal Decision APP/L1765/W/24/3350662



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### *The Framework – Housing Land Supply*

32. The Framework, published in December 2024, sets out that its new five year supply provisions should take immediate effect and include a revised standard methodology for calculating housing needs, along with the need for an appropriate buffer. As set out in Appendix 3 of the Addendum Statement of Common Ground, the Council acknowledge that the annual requirement under the Framework is for 1,157 dwellings per annum. As a illustration of the vast difference, the housing figure under the current development plan, which is over five years old, is for 676 dwellings per annum. The Council have also sought to justify a 5% rather than 20% buffer and I find no reason to disagree with this approach. Furthermore, the parties are in agreement on the 3,888 dwellings that make up the supply and thus, there was no need to look further into evidence on the individual sites, permissions and allocations.
33. The Council emphasise that the examination into the eLP is due to commence in April 2025 and will be seeking to establish a lower housing requirement than that required by the Framework under the transitional arrangements. The figure promoted in the eLP is 773 dwellings per annum. The Council's calculation of its five year supply for this appeal is therefore based on a combination of the Framework requirement for year one and the need for years 2 – 5 being set by the eLP, assuming its adoption in late 2025.
34. Whilst the Council suggests that it can demonstrate a 5.4 year supply of housing based on its hybrid approach to calculating need and making a healthy deduction based on past over supply, I am not content that the adoption of the eLP can be considered so certain or so imminent to accept this as a robust position. It is clear that the Council are progressing its eLP, but it was indicated at the hearing that it was only capable of attracting very limited weight. Therefore, whilst I do not seek to replicate the role of the examination, I am not persuaded by the evidence of the Council as part of this particular appeal that it can demonstrate a 5 year supply of housing land with appropriate 5% buffer.
35. Absent of any more robust evidence of the Council to the contrary as part of this appeal, I adopt the appellant's position which indicates that the presumption in favour of sustainable development set out in paragraph 11 d) of the Framework is engaged for decision making purposes.