

## **Examination of the Winchester District Local Plan 2020-2040 - Hearing Statement on behalf of Taylor Wimpey Strategic Land - ANON-AQTS-32TA-K Field Farm, Swanmore**

### **Matter 4 – Meeting housing need**

**Issue: Whether all Statutory and Regulatory requirements have been met?**

**Issue: Would the overall strategy and provision for housing development be justified, effective and consistent with national policy?**

**Calculation of Local Housing Need (LHN)**

- 2. Is there substantive evidence to demonstrate that it would be appropriate to plan for a higher housing need figure than the standard method indicates in this case as per advice set out in the PPG (Paragraph: 010 Reference ID: 2a-010- 20201216)?***

There is substantive evidence that it would be appropriate for the Plan to include a higher housing needs figure than the Standard Method (SM) indicates because of the need to accommodate a greater number of dwellings from neighbouring areas (which is exacerbated as a result of the significant increases in SM figures arising from the December 2024 NPPF) and the requirement to include an appropriate 'buffer' to allow for slow/reduced delivery.

Paragraph 61 of the NPPF (December 2023) requires that in addition to meeting local needs, any needs that cannot be met within neighbouring areas should be taken into account. Winchester District Council, in conjunction with nearby authorities, have jointly identified an unmet need for 11,771 homes between 2023 and 2036 across the area covered by the Partnership for South Hampshire (PfSH) which includes the southern part of Winchester District – see PfSH Spatial Position Statement 2023. The authorities propose to address this need through a two stage approach. Stage one: in the short to medium term five authorities (Winchester, East Hampshire, Eastleigh, Fareham and Test Valley) “should be able to meet and potentially exceed NPPF 2023 standard method-based housing needs in their respective local plan areas” (PfSH Spatial Position Statement 2023). The Statement goes on to set out that stage two is to identify Broad Areas of Search for Growth to contribute towards meeting ongoing unmet housing need in the longer term.

It should be noted that the above unmet need figures are calculated on the basis of now out-of-date SM/Local Housing Needs methodology. With very significant increases arising across the PfSH authorities (other than Southampton) as a result of the new SM (December 2024), the level of unmet need is likely to rise significantly, especially in the more constrained authorities such as Gosport, New Forest, Portsmouth and Havant. As such, the PfSH Position Statement 2023 can be given limited weight.

Nonetheless, Havant Borough Council and Portsmouth City Council have currently both formally requested assistance from Winchester City Council with meeting expected shortfalls of about 4,377 and 4,309 dwellings respectively, a total of 8,686 dwellings.

Winchester District has larger areas of unconstrained land than nearby authorities. It is capable of accommodating more than the 1,900 dwellings proposed towards unmet need. The Strategic Housing and Employment Land Availability Assessment (SHELAA) 2023 states that there is a theoretical residential capacity of SHELAA sites totalling 62,359 dwellings, therefore far in excess of the 1,900 currently proposed contribution towards unmet need. The opportunities that these sites present should be fully explored to inform the actual quantum of housing that the District can accommodate. This should include a proper

review of existing Settlement Gaps (see our comments in relation to the Development Allocations section of the Plan in relation to concerns about how sites within the Gap have been assessed). My client's land at Field Farm, Swanmore, referred to as 'Land at Swanmore Road' in the Council's evidence base (ref. SWA10), is free from any significant constraints and we have consistently made representations advocating for its allocation for residential development to help meet housing needs.

Furthermore, the housing supply relied upon should provide for sufficient contingency to accommodate the inevitable non-delivery and delays that will affect some sites. Many LPAs and Inspectors have concluded that the housing requirement should include such a 'buffer' above the full housing need in order to ensure that housing needs will be addressed. The 'buffer' to be applied in any one LPA will be largely determined by the reliability of the supply but is normally at least 5% if not 10%.

However, the draft Local Plan provides no such 'buffer' and is therefore entirely reliant upon 100% of the supply delivering within the plan period. This is entirely unrealistic, particularly given that the Plan relies upon the delivery of a number of large brownfield sites, including Sir John Moore Barracks (WC2) 900 dwellings and Central Winchester Regeneration Area (WC7) 300 dwellings. Previously developed land often takes longer to deliver, particularly large sites such as these, and is likely to deliver reduced/no affordable housing given existing land values and higher development costs. As such, it is entirely appropriate to include a buffer to allow for slow/reduced delivery.

The application of a conservative 5% buffer above the need for at least 13,565 (excluding unmet needs) would result in a minimum housing requirement of 14,243 dwellings (excluding unmet needs). An appropriate unmet need figure will need to be added to this amount. As set out above, this should be increased given the relatively unconstrained nature of the District and the theoretical capacity identified within the SHELAA. The overall housing provision should be increased following a robust assessment of capacity to respond to a pressing need for open market and affordable housing and student accommodation within the District.

In addition, there is no detailed housing trajectory included in the Local Plan. It is not clear what sites are expected to be delivered and when and without this it is not clear what sites the Council are relying on to maintain a housing land supply.

Policy H1 should be amended to make it clear the housing requirement is a minimum and to increase the overall provision of housing, to be informed by a thorough analysis of the capacity of SHELAA sites.

#### **The housing requirement**

- 3. In addition, it includes an allowance of 1,900 dwellings to take account of any needs that cannot be met within neighbouring authorities. Given constraints in the District, including within the SDNP, is this figure, which exceeds LHN justified by the evidence?***

As above, Winchester District has larger areas of unconstrained land than nearby authorities. It is capable of accommodating more than the 1,900 dwellings proposed towards unmet need, with a theoretical residential capacity of SHELAA sites totalling 62,359 dwellings. The 1,900 allowance should be increased accordingly.

- 4. In accordance with the approach set out in the Partnership for South Hampshire (PfSH) position statement and ongoing cooperation with neighbouring authorities, Portsmouth City Council and Havant Borough Council have confirmed an unmet need. How has the unmet needs allowance in the Plan been calculated?***

How the unmet needs allowance figure has been calculated is unclear. As above, there is a shortfall of 8,686 dwellings across Portsmouth City Council and Havant Borough Council areas and Winchester City Council has the capacity to accommodate a higher amount, especially given that the scale of unmet need is only likely to rise given the implications of the 2024 SM.

- 5. *Is there any substantive evidence to demonstrate that there should be an adjustment to the minimum housing requirement to help deliver affordable housing with regard to the PPG (Paragraph: 024 Reference ID: 2a-024- 20190220), and if so, would that be effective?***

Yes. The Winchester Strategic Housing Market Assessment Update (SHMA) identifies a need for 368 affordable dwellings per annum. This equates to 56% of the annual housing requirement (661 dpa). As set out in Policy H6, there is no requirement for sites of less than 10 dwellings to provide affordable housing, with brownfield sites being required to provide 30% affordable housing and greenfield sites 40% provision. These thresholds are to be reduced to 15% and 25% respectively on a temporary basis to allow for viability impacts arising from nutrient mitigation. As such, it is reasonable to expect that the overall provision of affordable housing will be in the 30-35% range. Assuming a 32.5% average would result in the delivery of only 215 affordable dwellings per annum which is a shortfall of approximately 150 dpa, a total of a 3,000 shortfall in affordable housing over the Plan period. This shortfall should be addressed by an increase in the overall minimum housing requirement.

- 8. *Taking account of completions since the start of the Plan period, extant planning permissions and other commitments, less than 25% would be delivered by new site allocations. In this regard, would the Plan be positively prepared? Would it be effective, justified and consistent with national policy which aims to significantly boost the supply of homes (NPPF paragraph 60)?***

No. The reliance on rolling forward historic allocations, which have often failed to deliver housing at anticipated rates, does not constitute positive and forward thinking plan making to meet the needs of the District.

- 9. *Would the Plan period accord with NPPF paragraph 22, which requires strategic policies should look ahead over a minimum 15 year period from adoption?***

The Local Plan period should be extended by at least 5 years as the current base date for the Plan is 2020. It will be five years old already at the anticipated point of adoption, (Q3 October – December) 2025.