

WINCHESTER LOCAL PLAN EXAMINATION

Matter 4 Hearing Statement

Hallam Land

April 2025

1. This Hearing Statement has been prepared on behalf of Hallam Land. It concerns Matter 4: Meeting housing need. Hallam Land submitted representations at various points during the Local Plan's preparation.

Calculation of local housing need

- 2. Table H1 explains the housing requirement is derived from the *Standard Method* as it existed for the purpose of the transitional arrangements that are in effect in this instance. Of note, the Standard Method is the measures of the "minimum number" of new homes to be planned for.
- 3. For context, and as recognised in ED02 paragraph 2.5, the December 2024 Standard Method equates to 1,157 new homes per annum. The plan's level of provision over the 20-year period is some 60% of this; plainly there will be a notable increase in the amount of housing that will need to be provided in due course.
- 4. We are aware of representations by the Home Builders Federation as to the plan period and the effect of housing provision in those years that have already passed and we do endorse those submissions.
- 5. We are also aware of the scale of affordable housing need evidenced in the Strategic Housing Market Update (HA01). There is a significant need for additional affordable housing to be provided. A higher housing requirement would contribute positively to meeting what would otherwise be unmet need.

The Housing Requirement

- 6. Table H2 illustrates that the housing requirement is 15,465 dwellings over the plan period.
- 7. Whilst it refers to 350 new homes being provided within the South Downs National Park, it is notable that the National Park Authority indicate an alternative figure of 250 new homes. If the National Park Authority's figure is the correct figure, there would be a shortfall that is not accounted for otherwise.
- 8. Table H2 includes an allowance for unmet needs from neighbouring authorities which is added to the *Standard Method*.
- 9. Paragraphs 9.15 and 9.16 explain this in the follow terms:

"The Standard Method need is therefore currently 13,565 dwellings for the district over the Local Plan period to 2040 (see Table H1 -bottom left). Within southern Hampshire there are a number of authorities that appear unable to meet their Standard Method housing need in full and the Partnership for South Hampshire (PfSH) has developed a Spatial Position Statement to address this.

The PfSH authorities are taking a two stage approach to addressing the needs of those authorities that may demonstrate that they are unable to meet their housing needs in full. In the short to medium term several authorities, including Winchester, should be able to exceed their Standard Method based housing needs. Therefore, an unmet needs allowance is provided in the spirit of

- <u>cooperation required by government policy, to help contribute towards the PfSH shortfall".</u> (emphasis added)
- 10. The Local Plan's contribution to unmet need is referred in Table H2 as 1,900 additional dwellings. In the manner shown in Table H2, it is not possible to ascertain which neighbours' unmet need is being assisted, although we are aware of a proposed modification to clarify this.
- 11. ED02 explains the extent of unmet need across the PfSH sub-area. Paragraph 4.4 refers to "snapshot" figures of 10,750 dwellings at 2020 and 11,771 dwellings by December 2023.
- 12. PSH01 (Table 1) illustrates that each of the Local Authority areas that neighbour Winchester to the south (Eastleigh, Havant and Portsmouth) have a shortfall in supply.¹
- 13. It is instructive that these estimates were derived from the previous calculations of housing need. We are aware of an alternative account provided by the Home Builders Federation which illustrates firstly, the increase in the housing requirement employing the current Standard Method, and secondly, the scale of shortfall that would arise as a consequence.
- 14. There is plainly substantive evidence of unmet need across the sub-region, and as a matter of principle, increasing this component of the housing requirement would assist with addressing this inevitable shortfall. As explored in our Matter 2 Statement, this has a spatial dimension that would support increasing the number of new homes to be delivered in those settlements close to the south Hampshire areas.

The overall supply of housing

- 15. ED02 (Table 4) records the housing land supply position from various sources over the plan period. Excluding the 350 dwellings assumed to be provided in the National Park, the number of new homes that should be built in the plan period would total 15,115.
- 16. In comparison the total number of dwellings that the Council expect to be built amounts to 15,041.
- 17. Evidently on the basis of these figures, the housing requirement will not be met. This is significant in the prevailing context.
- 18. The Council acknowledge this situation at paragraph 5.24 in ED02. Its solution is to suggest a proposed modification to reduce the housing requirement in Policy H1. This is akin to the tail wagging the dog and does not represent positive planning.
- 19. Moreover, the Council has not included any degree of contingency in its estimate of supply. It is both common and good practice to include an element of theoretical oversupply to account for what are inevitable instances where the components of supply do not come forward as anticipated. Such an allowance is ordinarily included as 10%. Applying this to just existing and proposed allocations would amount to land for an addition 800 new homes.
- 20. For these reasons alone the number of new homes which the plan identifies should be increased so that it is both positively prepared and effective.

A review

- 21. Paragraph 236 of the NPPF states that, under the transitional arrangements, a plan which has been adopted that meets less than 80% of local housing needs, as assessed using latest standard method, the planning authority will be expected to start work on a new plan in order to address the shortfall in housing need.
- 22. In this instance the difference between the current level of housing need compared with what the plan proposes is of such a magnitude that a Policy to this effect would in the Local Plan would give practical effect to this and a firm commitment that can be measured. This need is heightened further by the circumstance associated with unmet need for PsFH.

^{1.} Notably Fareham Borough doesn't have a shortfall on account of it having subsumed the Welborne New Settlement into its Borough Wide supply figure whereas it had initially been conceived to meet sub-regional needs