

Winchester District Local Plan 2040 Examination

Matter 1: Procedural and legal requirements

Statement on behalf of Thakeham Homes Limited

(Respondent ID: BHLF-AQTS-326A-N)

Land at Paddock View, Littleton

April 2025



THAKEHAM

Table of Contents

Introduction	3
Issue: Whether all Statutory and Regulatory requirements have been met?	5
Duty to Cooperate Question 1	5
Duty to Cooperate Question 2	6
Sustainability Appraisal Question 3	7
Sustainability Appraisal Question 6	7

1. Introduction

- 1.1 This Statement (the “Statement”) has been prepared by Thakeham Homes Limited (Thakeham) in response to Matter 1 of the Inspector’s Matters, Issues and Questions for the Winchester District Local Plan 2040 Examination. This Hearing Statement only addresses the Inspector’s questions relating to the Duty to Cooperate (DtC) and the Sustainability Appraisal (SA).
- 1.2 Thakeham has sought to engage with Winchester District Council (WDC) throughout the preparation of the Local Plan, including through the submission of representations to the Pre-Submission (Regulation 19) consultation. For these representations Thakeham were assigned the Respondent ID: BHLF-AQTS-326A-N by WDC.
- 1.3 Thakeham has promoted Land at Paddock View in Littleton as an opportunity to deliver a sustainable and inclusive new neighbourhood on the edge of Littleton for circa. 122 net zero carbon homes. We understand this Examination will not be considering omission sites, but should the Inspector request main modifications, that Land at Paddock View in Littleton is considered.
- 1.4 This Statement should be read alongside Thakeham’s responses to other Matters and previous representations. The comments made here do not prejudice any other representations submitted by Thakeham that respond to other interests elsewhere in the District.
- 1.5 It should be noted that in this Statement we have only sought to respond to questions which are of relevance to Thakeham’s interests. Our comments have regard to national planning policy guidance, relevant legislation, and any other material considerations.

About Thakeham

- Thakeham do not just build houses; Thakeham is an infrastructure-led sustainable placemaker.
- Thakeham is committed to creating beautiful, well-integrated places where communities can thrive.
- As a sustainable placemaker, Thakeham’s commitment to improving existing communities means its schemes are design and infrastructure-led; engaging with education, highways, healthcare, utilities, and other stakeholders from the start of a

project to ensure sustainable provision for new and existing communities to benefit from community assets.

- Each development is different and tailored to its locality, with careful consideration of the area's character, as well as the environment.
- The delivery of homes facilitates the delivery of physical, social, and green/blue infrastructure which benefits the wider surrounding residents and area.
- Thakeham was the first housebuilder in the UK, and the first five in the construction sector globally to have made commitments on the SME Climate Hub and be part of the United Nations' Race To Zero campaign. As part of this, we have committed to the SME Climate Commitment.
- On every development, Thakeham seeks to exceed the Government target of 10% Biodiversity Net Gain. This is through our landscape-led approach to placemaking, including hedgehog highways, year-round variation for wildlife, as well as green and blue infrastructure, open space and play space, and our 'Eddie & Ellie's Wild Adventures' initiative in primary schools to promote the importance of ecology and biodiversity, delivering National Curriculum linked activities and early career-based learning.

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

2. Issue: Whether all Statutory and Regulatory requirements have been met.

- 2.1. As set out in paragraph 1.1. above, this Hearing Statement only addresses the Inspector's questions relating to the Duty to Cooperate (DtC) and Sustainability Appraisal (SA).

Duty to Cooperate

(1) *Is there clear evidence that the Council has engaged constructively, actively and on an ongoing basis with neighbouring authorities and prescribed bodies in accordance with section 33A of the 2004 Act, in respect of strategic matters with cross-boundary impacts considered through the preparation of the Plan?*

- 2.2. We do not believe that the Council has undertaken an appropriate level of engagement on an ongoing basis. The Plan period covers 2020 – 2040, with initial evidence gathering starting in 2020 to inform a number of consultation documents that ultimately informed a Regulation 18 Draft Plan in November 2022 and a Regulation 19 Submission Plan in October 2024.

- 2.3. A key purpose of the Duty to Cooperate is to understand the cross boundary issues, such as unmet housing need and infrastructure pressures. If Winchester were seeking to engage constructively in the process, we would expect evidence of engagement during the information gathering stage between 2020 and 2022, to help inform the Local Plan strategy going forwards. However, based on the Duty to Cooperate Statement, of the eight (8) local authorities the Council has suggested it has engaged with, they only appear to have engaged with Basingstoke and Deane, having had 4 meetings between 2020 and 2022. They only undertook 1 meeting with three other authorities between 2020 and 2023.

- 2.4. On the basis of the above, it is unclear how the Council can have engaged constructively to inform their Plan to support wider cross-boundary issues if they did not engage with many of their surrounding authority areas until after they had created and consulted on a Regulation 18 Draft Plan – by which time their vision and objectives would have been clearly formulated.

- 2.5. Therefore we do not believe the Council has provided clear evidence of constructive or ongoing engagement with neighbouring authorities, and cannot demonstrate

effective cooperation in accordance with the NPPF, or in line with section 33A of the Planning and Compulsory Purchase Act 2004.

(2) *In particular in relation to the unmet housing need in Partnership of South Hampshire area (PfSH) and individual adjoining Councils, especially Portsmouth and Havant and Basingstoke in relation to the establishment of a new community at the Popham Airfield and Micheldever Station?*

2.6. The Housing Need calculations for PfSH only cover a period between 2023 and 2036, while the Winchester 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 relevant Standard Method figures of 235 this would result in an **increase of 940 dwellings** to be accounted for in the Winchester plan period.

2.7. Furthermore, the housing need figures for PfSH are based on the 2023 NPPF and standard method calculations. The December 2024 NPPF includes a new Local Housing Need approach to calculating each areas annual housing requirements, which are shown in the below table and will see all the relevant authorities housing need increases from 5,802 dpa to 7,727 dpa. This means the total shortfall in the region increases from 11,771 to 35,025 between 2024 and 2036 (**23,254 housing need increase**).

Table 1: Updated local housing need and supply 2024 - 2036

Local Authority	Annual Housing Need using 2023 Standard Method (dpa)	New LHN Annual Housing Need 2024	New Total Housing Need (2024-2036)	Housing Supply (2024 – 2036)	Shortfall/ surplus
East Hants (part)	113	228	2,736	1,777	-959
Eastleigh	667	911	10,932	5,686	-5,246
Fareham	541	797	9,564	8,636	-928
Gosport	353	433	5,196	2,324	-2,872
Havant	516	881	10,572	3,789	-6,783
New Forest	1,056	1,507	18,084	7,455	-10,629
Portsmouth	899	1,363	16,356	10,434	-5,922
Southampton	1,475	1,205	14,460	14,724	+264
Test Valley (part)	182	402	4,824	2,870	-1,954
Total	5,802	7,727	92,724	57,695	-35,029

2.8. In light of the above, there is a clear requirement for Winchester to re-examine the provision of unmet housing need across the Plan period.

Sustainability Appraisal

- (3) ***The SA tested five spatial strategy options: a development strategy based on the adopted Local Plan, focusing development on Winchester and the larger more sustainable settlements; a strategy based on a new strategic allocation/new settlement; a strategy based on dispersing development around the District largely in proportion to the size of existing settlements; and, a variation of option 1, known as option 1A, which provides for a higher total number of dwellings. It takes account of existing commitments, windfall allowance and has the effect of reducing development in the South Hampshire Urban Area and increasing it in Winchester and the Market Towns and Rural Areas. Given national policy¹ that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas should an option with a higher growth target have been considered?***

2.9. Yes, a higher option beyond option 1A should have been considered. The Integrated Impact Assessment outlines the 5 options that were tested. Four of these delivered 14,000 homes over the plan period with 1A delivering 15,620 homes. Paragraph 4.4 of the IIA notes that this additional option included consultation responses on the SIP and provides headroom for any uncertainties – such as changes to the standard method or progress with the Partnership for South Hampshire Joint Strategy. As the regulation 19 plan was being prepared it should have been evident through the Duty to Co-operate that the unmet needs in neighbouring authorities were going to be significant and that it would be necessary to test a potential strategy that would address the unmet needs of neighbouring areas in full. This was clearly a reasonable alternative given the evidence available to Council at the time and is clear failure of the IIA in seeking to ensure the plan is an effective one that has considered reasonable alternatives.

- (6) ***In overall terms does the Plan meet the legal requirements of Section 19(5) of the 2004 Act and accord with National Planning Policy Framework (NPPF) paragraph 32 and the Planning Practice Guidance (PPG) in this regard?***

2.10. The principal concern is that there has been no higher housing requirement considered through the Sustainability Appraisal, despite a clear increase in unmet need for neighbouring authorities. This was clearly a reasonable alternative based on available evidence and should have been considered and assessed through the IIA.