

Winchester District Local Plan 2040 Examination

Matter 4: Housing need and supply

Statement on behalf of Thakeham Homes Limited

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

Land at Paddock View, Littleton

April 2025



THAKEHAM

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1. Introduction

- 1.1 This Statement (the “Statement”) has been prepared by Thakeham Homes Limited (Thakeham) in response to Matter 4 of the Inspector’s Matters, Issues and Questions for the Winchester District Local Plan 2040 Examination.
- 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 the overall strategy and provision for housing development is justified, effective and consistent with national policy.

Calculation of Local Housing Need (LHN)

- (1) *The Council has calculated LHN using the Government's standard methodology. That gives a figure of 13,565 dwellings over the Plan period 2020-2040. That figure includes an affordability adjustment to take account of past under delivery. In this regard does the Plan accord with NPPF paragraph 61, which indicates that strategic policies should be informed by a local housing needs assessment conducted using the standard method in national planning guidance (PPG)?***
- 2.1. Thakeham does not agree with the Plan period running from 2020, which is five years prior to the submission. The Plan also only runs until 2040, which will be less than 15 years should the plan be adopted. This is in direct contradiction with paragraph 22 of the NPPF.
- 2.2. Regardless of the Plan period, as the Plan has been submitted under the 2023 NPPF process, it is acknowledged that the calculations for the LHN are in accordance with paragraph 61 of the NPPF.
- (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)?***
- 2.3. Yes. As set out above, the Plan is only providing housing for a 14 year period should the Plan be adopted, which means there is a requirement to identify at least one more year supply (**676 dwellings** under relevant Standard Method) to accord with paragraph 22 of the NPPF.
- 2.4. Also, as set out within our Matter 1 Hearing Statement the updated need within the surrounding authority areas has increased significantly under the new Local Housing Need calculations, which Winchester has currently failed to factor in to the housing need figure. 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

- 2.5. Furthermore, the PfSH housing need requirements only run to 2036, meaning there has been no consideration of the remaining four years of the Plan period (2036 – 2040). This means 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.
- 2.6. Accordingly, even if there is no consideration of the latest LHN uplift for surrounding authorities, there is still a requirement to identify **1,616 additional dwellings** to account for the plan period.

The housing requirement

- (1) ***The Plan makes provision for 15,465 dwellings over the Plan period (2020-2040). That includes approximately 350 dwellings within the South Downs National Park (SDNP) part of Winchester District. Would that approach accord with NPPF paragraph 61?***
- 2.7. Thakeham acknowledges the inclusion of delivering homes within SDNP would accord with paragraph 61 of the NPPF.

(2) *The SDNP Authority suggest a figure of 250 dwellings would be delivered within the SDNP in the Plan period. What would be the consequence should the lower figure deliver rather than the 350 accounted for in the Plan?*

2.8. The SDNP Authority are likely to be better placed than Winchester to know the total deliverable housing numbers in the Plan period. The lower figure will therefore result in a shortfall of housing delivery against the housing requirement across the Plan period. The Council should therefore allocate an additional 100 dwellings in a sustainable location.

2.9. As set out at paragraph 2.6 above, the Plan is already deficient in housing numbers against the actual requirements within the district. The over estimation of the SDNP figure will further exacerbate this, resulting in significant shortfall against the housing requirements that will also impact on 5-year housing land supply that could lead to unchecked speculative development in future.

(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?*

2.10. The inclusion of an allowance to meet needs in other areas is fully justified and consistent with national policy. Paragraph 11 and 61 of the NPPF state that any needs that cannot be met in neighbouring areas should also be taken into account when establishing the number of homes to be planned for. However, as set out at Paragraph 2.4 and 2.5 above, and our Matter 1 Hearing Statement, we do not believe that the 1,900 dwelling allowance to address unmet need in neighbouring areas is sufficient given the scale of those needs and the fact Havant, Portsmouth and Gosport for example clearly have limited physical capacity for increasing supply beyond what is already proposed.

(5) *In stating an unmet need allowance as opposed to a figure intended to meet the need in each authority, would the Plan be effective? Would it accord with NPPF paragraph 61? If an intended figure were included in the Plan, how should that be expressed (as a percentage or specific numbers)?*

2.11. No. The Plan should identify the specific amount of unmet need it will take from each adjacent local authority area, or there will be a lack of clarity around the potential future requirements when these areas come to make their Plans.

(6) *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?*

2.12. Yes. The Strategic Housing Market Assessment update (HA01) provides evidence that there is a significant amount of affordable housing need within Winchester. The highest need is for affordable / social rented housing, but when including the need for affordable home ownership, the requirement is **495 dwellings per annum** for the plan area. This would result in the need to deliver 9,900 affordable homes over the Plan period (2020 – 2040), which is 64% of the total housing provision in the Plan period (15,465 dwellings).

2.13. Based on the SHMA update, and in order to reflect the Council's own affordable housing target of 40% across all developments, the Council should have identified 24,750 dwellings across the Plan period.

(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)?*

2.14. Paragraph 60 of the NPPF states '*it is important that a sufficient amount and variety of land can come forward*'. The Plan is entirely reliant on existing commitments with very few new sites, that will result in a lack of variety of new housing land across the district. Therefore, the Plan has not been positively prepared and does not accord with the NPPF requirements.

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

2.15. No. As set out at paragraph 2.3 above, if the Plan were to be adopted, it would not happen until 2026, at which time the Plan period will only be 14 years.

- (10) Given the Plan's start date of 2020, recent levels of 'overprovision' compared to the Standard Method figures are taken into account. Is such provision already reflected in the Standard Method calculation in terms of affordability uplift going forward on the basis of a link between completions and house prices?**

2.16. Yes. The Standard Method calculation is based on annual affordability ratio updates, which take into account any past under or over delivery, which is stipulated in the Planning Policy Guidance at paragraph 2a-011-20190220. Therefore, the Council 'overprovision' factors act as 'double-counting' which artificially reduces the additional housing requirement.

The overall supply of housing

- (2) Is the housing trajectory realistic and deliverable? Are there any threats to delivery?**

2.17. Whilst the Council has identified a trajectory in ED02, this does not provide any allowances for any potential site delays and should have factored in a buffer to allow some flexibility to site delivery.

2.18. With regard to threats, the focus on major strategic sites for the bulk of housing delivery could have a significant impact. The process for obtaining an implementable planning permission, including the relevant conditions is complex on large sites. In addition, there are ownership and legal issues that will require addressing prior to submitting relevant planning applications. It is therefore likely that the reliance on larger sites to deliver the housing numbers across the Plan period will result in delays to the planned trajectory, which will result in challenges to maintaining a defensible 5-year housing land supply position immediately should the Plan be adopted.

Five-year housing land supply

- (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?**

2.19. No. As set out at Paragraph 2.16 above, the Council is already 'double-counting' it's overprovision with the adjusted Standard method figures used to calculate the housing need going forwards. Therefore, if using the modified Annual Housing Requirement

(which already factors in the previous over-delivery) the cumulative completions over and above the requirement between 2020 and 2025 should not be a consideration. The total completions to 2024/25 should be 3,760 rather than 4,854, which is a reduction of completions of 1,094 dwellings.

- 2.20. In addition to the above, we do not believe the completion rates for North Whiteley are remotely realistic. According to the most recent Annual Monitoring Report, between 2018 and 2022 they have only obtained permission for delivery of 453 dwellings, or an average of 114 per annum, with the largest individual permission for 129 dwellings. In order to meet the Council's suggested trajectory, they will need to **more than triple** the number of dwellings gaining detailed permission. At most it would be reasonable to suggest 200 dwellings per annum from the North Whiteley site, which is an annual reduction of deliverable sites of 150 dwellings in 2024/25 and 2025/26, and a reduction of 100 completions in 2026/27 and 2027/28, with a reduction of 50 dwellings in 2028/29 and 25 dwellings in 2029/30.
- 2.21. Furthermore, we do not believe there is appropriate evidence for the early delivery of any of the sites that are new allocations without the benefit of planning permission between 2025/25 and 2029/30. Therefore, all of these should be removed and the Table should be updated as below:

Table 2: Updated ED02 Local Plan Housing Trajectory figures

	25/26	26/27	27/28	28/29	29/30
Annual completions (exc. new allocations)	704	783	711	721	669
Modified annual Requirements	752	752	752	752	752
Cumulative completions	4,464	5,247	5,958	6,679	7,348
Cumulative housing requirements	4,512	5,264	6,016	6,768	7,520
Dwellings above/below	-48	-17	-58	-89	-172

- 2.22. On the basis of the above, given the annual requirement is 752 dwellings per annum, this would result in a need for 3,760 dwellings, that should include a 5% buffer, resulting in a 5-year requirement for **3,948 dwellings**. Assuming all other sites already benefitting from permissions deliver at the rate set out in ED02, including continued rates at Newlands, this would result in the total 5-year supply position upon adoption of **3,588 dwellings**. This would result in the provision of **4.77-year housing land supply** upon adoption.