

## Examination of the Winchester District Local Plan 2020-2040 (the submitted Plan/the Plan)

### Hearing Statement

Prepared by tor&co on behalf of Bloor Homes  
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This examination Hearing Statement has been prepared by tor&co on behalf of Bloor Homes (Representor ID: ANON-AQTS-329Q-8) in respect of **Matter 4 – Meeting Housing Needs** of the Winchester Local Plan examination in public.

The comments made within this Statement respond directly to the questions set out in the Planning Inspectors Stage 1 Matters, Issues and Questions (ID13), and are presented in the context of the ongoing promotion of Land at Mill Lane, Wickham (Draft Policy WK5 and SHLAA ref. WI02 and WI06).

This Statement should be read in conjunction with the Bloor Homes' (Bloor's) Regulation 19 representations and Stage 2 Hearing Statements

#### **Matter 4: Meeting housing need**

***Issue: Would the overall strategy and provision for housing development be 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)?***

According to paragraph 9.15 and Table H1 of the draft Plan, the district's housing need has been calculated at 13,565 dwellings for the plan period up to 2040, based on the most recent standard method calculation from March 2024.

While Bloor is content that the housing need calculation follows the standard method in place at the time the Plan was prepared, consistent with paragraph 61, it is not considered to comply with the latter part of paragraph 61 or 67 of the NPPF. This requires local plans to also consider any unmet housing needs from neighbouring areas. The Council has not adequately factored in this additional requirement, in relation to the unmet housing need within the Partnership for South Hampshire (PfSH) area and adjoining authorities (see responses to Questions 1 and 2 (Duty to Cooperate) in Matters 1 Statement). Consequently, the total housing provision should be significantly higher.

Having established that there is a need to increase the current housing provision, there is a range of large and smaller sites across the three spatial areas, with potential to provide additional growth and therefore comply with the latter parts of paragraph 61 and 67 of the NPPF, for example expanding Land at Mill Lane, Wickham (draft policy WK5).

**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)?**

Yes. Bloor Homes considers the scale of unmet housing need in neighbouring areas to provide substantive evidence that justifies planning for a higher housing need figure. This approach aligns not only with PPG guidance but also with paragraphs 11b and 61 of the NPPF.

As set out in our regulation 19 representations, Bloor Homes consider that the Council has not taken sufficient account of the scale of unmet needs in neighbouring areas and that the Council should have considered a strategy that met more of the unmet needs arising in South Hampshire.

As set out within our hearing statement for matter 1, Table 1 within the PfSH Spatial Position Statement (SPS) (December 2023) shows there is a shortfall of just under 11,800 homes across the South Hampshire sub region. This is based on the previous standard method which is to be applied to this local plan examination. The additional 1,900 homes to be provided as an unmet needs allowance is only a fraction of what is needed based on the SPS. However, with the new standard method and applying a 5% buffer there would be a substantially larger shortfall which is estimated to be just under 39,000 homes. This is significant and whilst the Plan is to be examined under the previous standard method it is imperative that account is taken of future housing need in order to ensure that there is effective delivery of new homes in the future, throughout the plan period.

As set out in our response to Matter 1, the SPS identifies that strategic growth locations will be progressed through local plans. The Council has not done this, despite the Regulation 19 plan not having been published many months later and hence there will continue to be significant unmet need in south Hampshire.

In addition, there is a clear and significant affordability issue in Winchester, which the local plan fails to address. Winchester has one of the highest affordability ratios outside of London, with affordability worsening over the last 25 years. The Strategic Housing Market Assessment (SHMA) from July 2024, reveals that median rental prices in the district (as of September 2023) were higher across all types of housing when compared to all other geographies assessed. In addition, critically, the median house price was greater in Winchester than in wider comparable regions. This underscores the necessity for the local plan to be planning for a greater housing requirement to address this issue. As such, the stock of market and affordable housing need to increase considerably.

Notwithstanding that the PPG encourages the use of brownfield land, non-delivery of city centre sites and overreliance on re-allocating sites that have not come forward previously and are complex to deliver underline the importance of planning for additional, more deliverable housing sites.

Given these factors, there is clear justification for exceeding the standard method figure to ensure that the housing needs of both this district and its neighbouring authorities are met in full and that affordability issues are addressed.

**3. Are there other relevant factors to be taken into account in calculating the LHN?**

Yes, see Question 2 above,

**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?**

The SDNPA representations clearly indicate that the current figure is too high, and that the contribution from the National Park should be revised down to 250 homes. This reduction in delivery must be accommodated elsewhere within the district and as such additional housing is required to be provided in the local plan.

- 2. SDNP Authority suggest a figure of 250 dwellings would be delivered with 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?**

If only 250 dwellings are delivered within the South Downs National Park (SDNP) during the Plan period, the resulting shortfall of 100 homes must be addressed elsewhere. This could include sites such as the sustainably located Mill Lane (draft policy WK5), which could be expanded to encompass the Land at Junction of Mill Lane, Wickham (WI06), previously promoted, providing an additional 60 homes.

- 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?**

Paragraphs 11 and 61 of the NPPF state that when determining the number of homes to be planned for, consideration must also be given to any unmet needs from neighbouring areas.

The proposed 1,900-dwelling allowance to address unmet housing need in neighbouring authorities is insufficient given the scale of the shortfall identified in the PfSH Spatial Position Statement (PSH01), December 2023. Table 1 shows a shortfall of just under 11,800 homes across the South Hampshire sub region, with the Council's contribution representing 16%. This is a significant shortfall that will only increase in future on the basis of the latest standard method, up to an estimated 39,000, at which time the Council's additional dwelling allowance would represent 4.8% of the requirement.

There is little evidence to justify this figure which is an adjustment of an additional allowance provided within the Regulation 18 local plan, which was intended to meet both unmet need and fluctuations in the standard method.

Despite the identified unmet need within the PfSH area, which has been identified for a number of years, the known constraints faced by a number of its constituent authorities (Paragraph 3.24, SD08h), and the requests by Portsmouth and Havant to accommodate their unmet need, no testing has taken place as to whether a higher housing capacity figure could be accommodated within the district.

In light of the above, the allowance of 1,900 is not justified by any evidence and the plan does not comply with the above paragraphs of the NPPF.

- 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?**

As set out in response to Question 3, there is little indication that the 1,900 homes proposed in the plan were thoroughly assessed or deemed sufficient to meet the identified shortfall. The lack of direct engagement with Havant and Portsmouth regarding unmet housing needs during the plan's preparation suggests that the approach was neither proactive nor strategic in addressing the requirements of these councils. It appears that meaningful discussions only took place after the publication of the Regulation 19 consultation, at which point Winchester engaged with both authorities and agreed on how the additional homes would be apportioned between the two authorities.

- 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)?**

An unmet need allowance as opposed to a figure is not effective. It should be expressed as a figure for each authority for clarity to ensure that the plan is effective and accords with paragraph 61. e.g. how much is being provided of what.

- 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?**

Yes, there is. As set out in response to question 2, the Strategic Housing Market Assessment update (HA01) highlights a substantial need for affordable housing within Winchester.

The greatest demand is for affordable/social rented housing, which is estimated at 368 dwellings per annum (dpa) for the plan area, (see table 3.11 of the SHMA update). When the need for affordable home ownership is factored in, the total requirement increases to 537 dpa for the plan area.

This represents a significant need for affordable housing, one that will not be met under the proposed housing strategy. The Council should have explored options to increase delivery beyond what is currently proposed, ensuring that more affordable homes are built to better address the needs of the population.

For example, as allocated Land at Mill Lane, Wickham (Policy WK5) (Site WI02) has the potential to deliver up to 16 affordable units (40% of the site). If the site were expanded to include Land at the junction of Mill Lane, Wickham (WI06) this would increase the total number of houses delivered on the site from 40 to around 100 and significantly elevate the number of affordable housing units to around 40 on the site.

- 7. Would the Plan be positively prepared in assessing and reflecting in its policies the size, type and tenure of housing needed for different groups in the community as per NPPF paragraph 62?**

Bloor Homes supports the principle of the provision of a range of housing types and tenures and recognises the importance of meeting housing need in accordance with most recent evidence.

A range of housing types and tenures can be delivered as part of the Land at Mill Lane, Wickham site (Draft Policy WK5) with the potential to increase this range if the site were expanded to include WI06.

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)?***

NPPF paragraph 60 explicitly aims to significantly boost the supply of homes. Table H2 (Winchester District Housing Need and Provision) of SD01 (page 216) shows that of a total District Housing Provision of 15,465 dwellings, only 2,875, just over 18% are provided by additional allocations in the Local Plan.

When spread over a 20-year plan period, this amounts to fewer than 150 new homes per year, which is far from significant. Consequently, Bloor Homes contend that the Plan cannot be considered to be effective, justified, or consistent with national policy.

For the Plan to meet paragraph 60 it should look to allocate additional housing on new sustainable sites such as that at Mill Lane, Wickham.

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?***

No. The Plan period from 01 April 2020-31 March 2040 does not accord with NPPF paragraph 22, which requires strategic policies to look ahead over a **minimum** of 15 years **from adoption** of the plan (our emphasis).

Paragraph 22 explicitly states 15 years from adoption. This highlights that even in the best-case scenario, where the plan is adopted by Q3 2025 (as per the February 2025 Local Development Scheme: ED16), the plan would not cover the full 15 year period. To comply with the NPPF the Plan period would need to extend to 2041, to meet the 15-year minimum and provide an additional 676 dwellings (LHN under the 2023 standard method).

The Council's evidence base has not accounted for an additional year or more of development and infrastructure needs and would require updating which would cause significant delays to the examination process. Alternatively, the Council could deduct this provision from its 1,900-dwelling unmet need allocation assigned to Havant and Portsmouth. However, this would further exacerbate its failure to meet the Duty to Cooperate requirements under Section 33A of the 2004 Act. Either approach would render the draft Local Plan unsound.

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?***

Yes, the provision is already reflected in the Standard Method calculation. The Standard Method accounts for past housing supply when determining future housing needs, as stated in paragraph 2a-005 of the NPPG.

Bloor Homes consider the Council's decision to include the 2020-2024 period within the plan inappropriate and unacceptable. The purpose of a Local Plan is to manage future development rather than retrospectively account for past overprovision. The Council's justification for this approach, as stated in paragraph 2.3 of SD10g is that this takes into account the high levels of housing development achieved over recent years. Paragraph



2.4 goes on to state that this is necessary as the NPPF or PPG does not make specific provision for past over-supply to be taken into account and this would otherwise be 'lost'.

Bloor Homes contend that the plan period should start from 2024, the year of Regulation 19 consultation when the housing requirement is determined and when the latest housing completion figures are available. The Council's current approach fundamentally misunderstands the standard method which takes account of past supply through the affordability uplift to determine housing needs moving forward.

**13. The Council has produced a Housing Topic Paper Update (ED02). That updates housing supply in accordance with the most recent Annual Monitoring Report (AMR) (2024). It identifies corrections and updates to the housing supply and consequent changes to the housing requirement. In this regard are modifications to the submitted Plan required for the purposes of soundness?**

Bloor Homes recommend that Table H3 within SD01 be revised to remove past completions and accurately reflect the correct Plan period of 2024–2041.

**The overall supply of housing**

**1. Would the housing trajectory provide a sound basis for meeting the identified housing need and accord with NPPF paragraph 78, which requires a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites? Does it identify a supply of specific, deliverable sites for five years following the intended adoption and specific, developable sites or broad locations for growth for the subsequent years 6-10 and, where possible for years 11-15 of the remaining Plan period, in accordance with NPPF paragraph 69?**

We have assumed the Inspector means paragraphs 75 and 67 of the 2023 NPPF.

The draft Local Plan lacks a clear housing trajectory. While the graph on page 218 illustrates the Council's anticipated progression of housing completions, further details are provided in Appendix A of the Housing Topic Paper Update (January 2025) (ED02). The absence of a detailed trajectory within the Local Plan itself directly does not accord with paragraph 75 of the NPPF.

It is important to understand how the Council anticipates the delivery of individual sites to assess whether they are being brought forward at the appropriate time to meet the 5 year housing land supply requirement, together with the requirement for the following 5 year periods. This information can be used to monitor housing delivery against the district's requirements and ensure that appropriate action can be taken if sites do not come forward as expected.

To address this, Bloor Homes proposes including a table within the Local Plan, similar to the one in Appendix A of ED02, to provide greater transparency of housing delivery.

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

No, the housing trajectory is not realistic or deliverable as currently proposed.

Winchester City Council's trajectory as set out on page 218 and the text at paragraph 9.23 of the draft plan, shows a downward trend in housing provision. Given the current stated level of unmet need in South Hampshire and the increased housing requirements

introduced under the revised standard method, the phasing of the new greenfield allocations in Winchester District into the second half of the plan period is unnecessary. To ensure an upward delivery trend across the plan period and beyond and to deliver a greater number of homes where they are needed - and to maximise opportunities to meet the unmet need in South Hampshire - provision should be made in this plan for additional strategic and other allocations, such as a larger site at Mill Lane, Wickham, which would promote and maintain higher levels of dwelling completions.

NPPF paragraph 82d states "*planning policies should be flexible enough to accommodate needs not anticipated in the plan*". This is considered particularly applicable to the growth requirements and potential of Wickham. Equally, NPPF paragraph 11 highlights that '*plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change*.' Accordingly, introduction of phasing will constrain housing delivery, and runs counter to the NPPF requirement for in-built flexibility within local plans. In being flexible and responsive to changing market circumstances, prioritising the development of previously developed land runs the risk of restricting the housing pipeline, further exacerbating the affordability housing challenge in the district.

Consequently, the policy wording should be revised to incorporate greater flexibility, and to not exclude other greenfield or other non-allocated deliverable sites from coming forward earlier in the plan period. This would also support the sustainability of settlements which would be frustrated if development is artificially held back.

There is no justification for holding back sustainable sites for development, and delivering affordable homes, in an area of acute affordability issues. All sustainable opportunities for the provision of housing in the district should be taken to positively respond to the significant challenge.

Additionally, the council's reliance on the delivery of higher annual housing numbers during the earlier part of the plan period is based on the delivery of a large number of outstanding planning permissions and windfall developments, many of which will be on brownfield sites. There is evidence from the current local plan (Central Winchester Regeneration Area and Station Approach Regeneration Area) that brownfield sites do not deliver when expected.

Without additional allocations and a more flexible approach to delivery, the current housing trajectory is neither realistic nor deliverable. Expanding allocations, such as Mill Lane, Wickham and bringing them forward earlier within the plan period, would significantly improve the plan's ability to meet housing needs, provide much-needed affordable homes, and ensure a steady supply of housing throughout the plan period.

- 3. *Is the contribution towards housing supply from windfall justified? Is there compelling evidence that they provide a reliable source of supply in accordance with NPPF paragraph 72?***

No comment

- 4. *In broad terms, is the housing development proposed in the Plan and set out in the trajectory based on a sound understanding and robust evidence?***

As outlined above, Bloor Homes has concerns regarding the limited supporting evidence in relation to the delivery timescales for a number of brownfield sites including the Central Winchester and Station Approach Regeneration Areas, which have historically not been delivered and do not have planning permission. Further concerns have been previously identified in Bloor's' Regulation 19 submission regarding the deliverability of other sites

including CC1 Clayfield Park, BW3 Tollgate Sawmill and KN1 Ravenswood, which also do not have planning permission and which in two cases are occupied by existing users who would need to relocate. Additional evidence is required to justify their inclusion early in the plan period (2025 onwards).

**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?**

It is entirely unacceptable for the Council to withhold permissions for new greenfield allocations until 2030. Paragraph 60 of the NPPF explicitly states that land with permission should be developed without delay. The Council must ensure that developments capable of coming forward early in this plan period are supported, not obstructed.

Although the submitted plan is being examined under the previous NPPF, it clear that the housing need in Winchester is significantly higher than what is being planned for. As a result, the Council will need to begin work on a new plan immediately after this one's adoption to address the shortfall.

Under the updated NPPF, the Council is expected to plan for 1,157 new homes per year, around 500 more than the current housing need assessment and well above projected delivery over the next five years.

Delaying the delivery of housing sites is therefore entirely inappropriate for what is essentially an interim local plan. There is a clear and urgent need for higher levels of housing delivery in the short term, with sustained growth into the medium and long term.

The Council's housing trajectory shows that there would be a significant reduction in housing delivery in the later years of the plan if greenfield housing delivery is held back. This would be contrary to the Government's objective to significantly boost the supply of homes (paragraph 60, NPPF). Furthermore, under the Sedgefield method, the Council's 5 year housing land supply would also drop below 5 years in the last 5 years of the plan.

Many of the larger brownfield sites which the Council is seeking to prioritise delivery of are affected by nutrient neutrality issues, including both nitrates and phosphates. Such sites are less likely to be able to easily achieve nutrient neutrality in the short term. Consideration should be therefore given to a more balanced approach to the location of development which allows greenfield sites which are less constrained by nutrient neutrality issues to come forward prior to 2030. One such site is the draft allocation at Land at Mill Lane, Wickham (Policy WK5) which could be expanded to deliver more housing.