

---

# Winchester Local Plan

---

Local Plan Examination

Hearing Statement relating to: Matter 4 – Meeting  
Housing Need

On behalf of: Bloor Homes Limited

## Matter 4: Meeting Housing Need

### Calculation of Local Housing Need (LHN):

#### Questions. 1-3

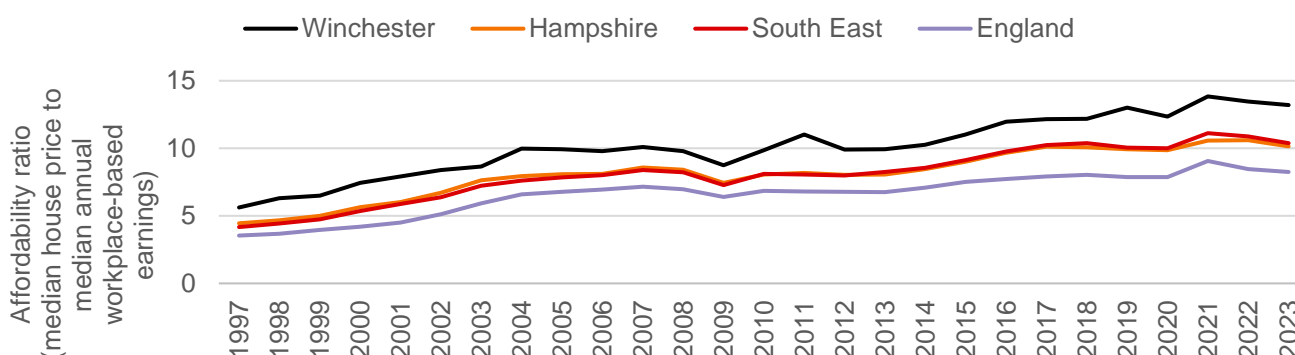
Bloor acknowledges the 2023/NPPF standard methodology ('SM') requires 13,565 dwellings to 2040, but consider this is wholly inadequate, given the acute local affordability crisis and extensive unmet need.

#### Affordability

Winchester is amongst the UK's least affordable areas, with prices well above regional averages. In 2024, the affordability ratio ('AR') was 12.06 (within the top quartile nationally). In comparison, the average 2024 ratio for Hampshire and the South-east was 9.6; and for England, 7.71.

In Winchester, housing has become increasingly unaffordable (Figure.1). The AR increased from 5.2 in 1997, to 9.9 in 2012, to 13.8 in 2021. Despite minor improvements since 2021 mortgage rates and house prices in Winchester have still risen. The gap between Winchester and elsewhere has increased, making it disproportionately more unaffordable than elsewhere.

**Figure.1: Affordability Ratio 2012-2023**



[Source: ONS]

In the year to June 2024, Winchester house prices increased by 3.3% compared to falls in Hampshire, the South-east and England (-2.2%, -2.3% and -1.0%).

Unaffordability is particularly acute in Winchester 'town'. Savills reviewed district-level house price variation using Land Registry data, showing that in the year to June-2023, prices in Winchester town were £645,000, compared with £592,000 for the district.

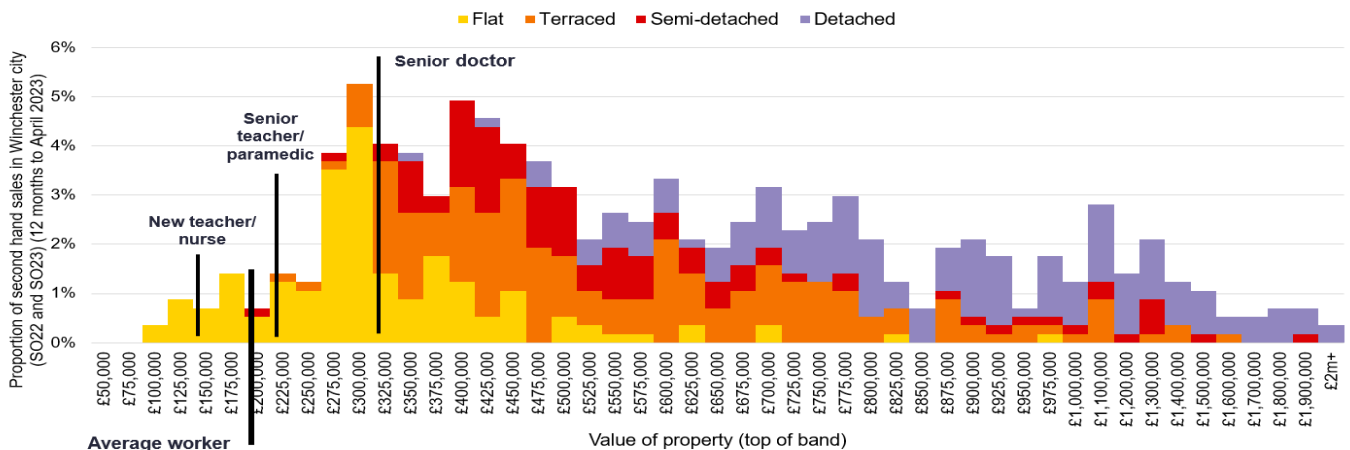
# Winchester Local Plan Examination

## Hearings Statement, Matter 4: Meeting Housing Need



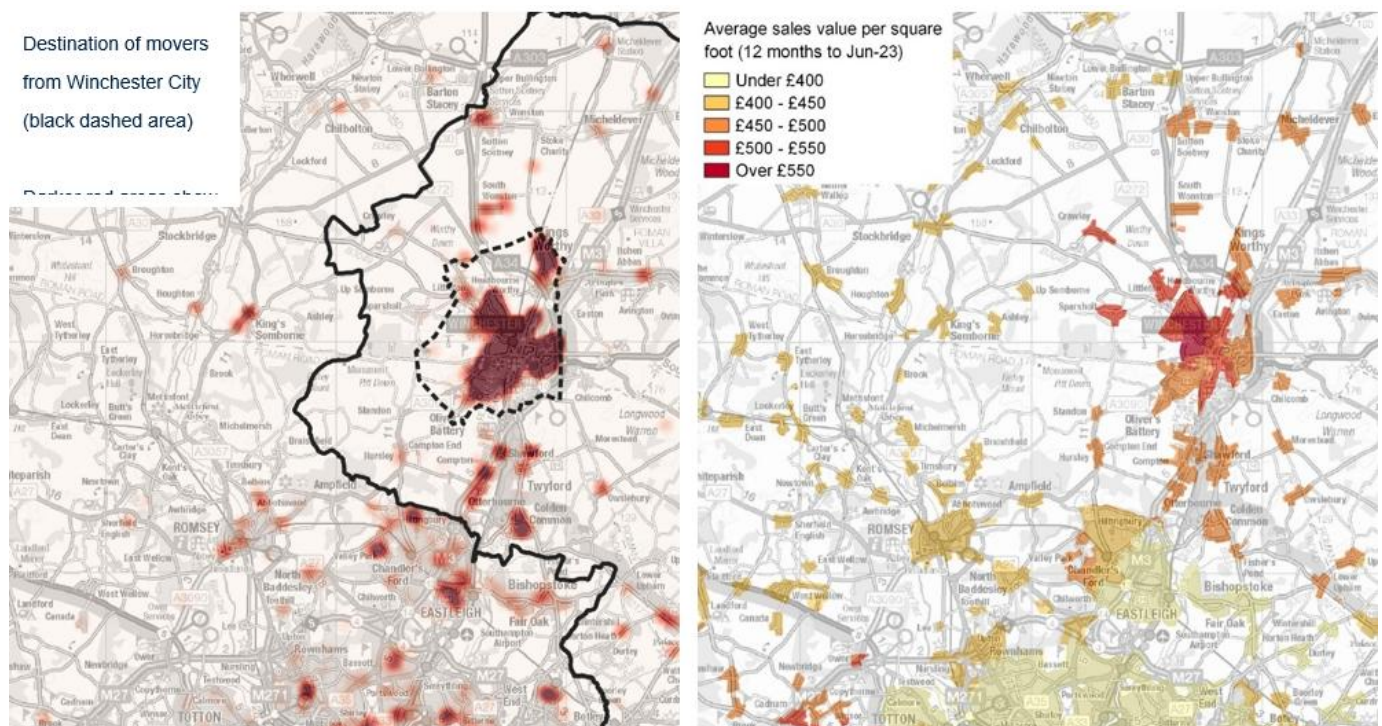
Hence the average local earner can afford only a few lower-value flats based on standard affordability assumptions (Figure.2). Hence local workers must relocate to access affordable, suitable housing (Figure.3). To rectify this, market and affordable delivery must be increased.

**Figure.2: House Prices (Winchester Town) Key Workers affordability**



[Source: Savills, NHS, ONS, Land Registry]

**Figure.3: Mover destination from Winchester Town and Winchester House Prices (£/sq.ft)**



[Source: Savills, Experian, Land Registry, EPCs]

# Winchester Local Plan Examination

## Hearings Statement, Matter 4: Meeting Housing Need



### Unmet Need

2023/NPPF Paragraph 67 states: “Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period”.

The PfSH Spatial Position Statement (December-2023) identified a shortfall of 11,771 dwellings (Table.1).

**Table.1: PfSH Housing Need and Supply 2023-36**

LPA	SM (2023) Apportioned to PfSH	Total Housing Need 2023-2036	Supply 2023-2036	Shortfall/ Surplus
East Hampshire (part)	113	1,469	1,274	-194
Eastleigh	667	8,671	6,160	-2,511
Fareham	541	7,033	9,356	900
Gosport	353	4,589	2,518	-2,071
Havant	516	6,708	4,105	-2,603
New Forest	1,056	13,278	8,076	-5,652
Portsmouth	899	11,687	11,304	-383
Southampton	1,475	19,175	15,951	0*
Test Valley (part)	182	2,366	3,109	743
Winchester (part)	235	3,055	3,055	0
	<b>6,037</b>	<b>78,481</b>	<b>64,909</b>	<b>-11,771</b>

\*Shortfall due to urban uplift. Not accommodated elsewhere

Bloor calculates PfSH shortfall utilising the 2024/NPPF SM requirement as 38,994 dwellings for 2024-2036 (3,250/year) (Table.2).

**Table.2: PfSH Housing Need and Supply 2024-2036**

LPA	SM (2023) Apportioned to PfSH	With a 5% buffer	Total Housing Need 2024-2036	Identified Supply 2024-2036	Shortfall/ Surplus
East Hampshire (part)	228	239	2,873	1,177	-1,696
Eastleigh	922	968	11,617	5,686	-5,931
Fareham	800	840	10,080	8,636	-1,444
Gosport	442	464	5,569	2,324	-3,245
Havant	892	937	11,239	3,789	-7,450
New Forest	1,501	1,576	18,913	7,455	-11,458
Portsmouth	1,021	1,072	12,865	10,434	-2,430

# Winchester Local Plan Examination

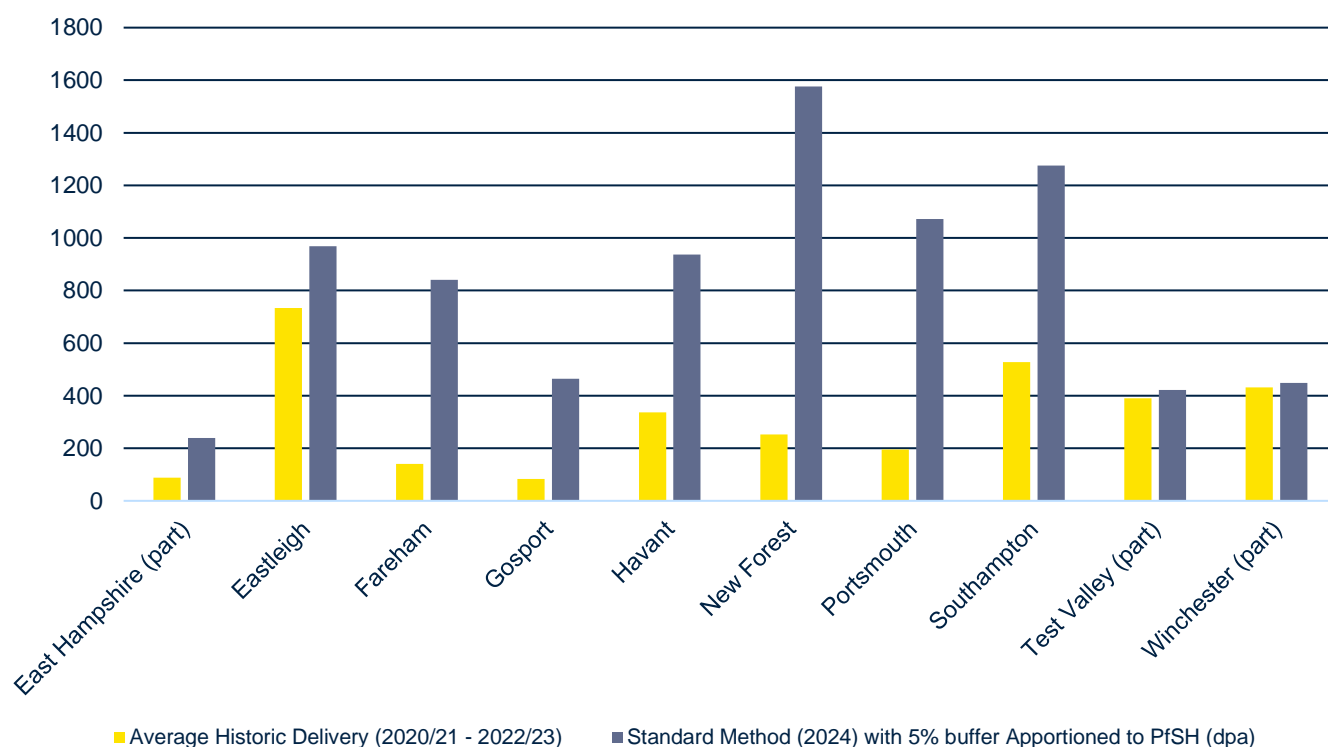
## Hearings Statement, Matter 4: Meeting Housing Need



LPA	SM (2023) Apportioned to PfSH	With a 5% buffer	Total Housing Need 2024-2036	Identified Supply 2024-2036	Shortfall/ Surplus
Southampton	1,214	1,275	15,296	14,724	-572
Test Valley (part)	402	422	5,065	2,870	-2,195
Winchester (part)	428	449	5,393	2,820	-2,573
	<b>7,911</b>	<b>8,243</b>	<b>94,201</b>	<b>59,916</b>	<b>-38,994</b>

Based on historic performance of authorities in the PfSH Bloor consider actual unmet need will be 41,526 dwellings Figure.4/Table.3/Table.4).

**Figure.4: PfSH Historic Delivery (2020/21-2022/23) (apportioned to PfSH) vs. Standard Method**



**Table.3: PfSH Historic Delivery (2020/21-2022/23) (apportioned to PfSH) vs. 2024/NPPF Standard Method**

LPA	Historic Delivery (2020/21-2022/23)	SM (2024) with 5% buffer	Difference
East Hampshire (part)	88	239	-217
Eastleigh	733	968	-235
Fareham	140	840	-700
Gosport	83	464	-381
Havant	337	937	-600
New Forest	252	1,567	-1,315
Portsmouth	195	1,072	-877

# Winchester Local Plan Examination

## Hearings Statement, Matter 4: Meeting Housing Need



Southampton	528	1,275	-747
Test Valley (part)	390	422	-32
Winchester (part)	432	449	-17
<b>Total</b>	<b>3,178</b>	<b>8,242</b>	<b>-5,064</b>

**Table 4: PfSH Housing Land Supply Position & Anticipated 12-Year Supply vs Identified Need**

LPA	Housing Supply LPA Position	Average Delivery (2020/21 - 2022/23)	SM (2024) with 5% buffer Apportioned to PfSH	Anticipated Yearly Shortfall/ Surplus	Housing Need 2024-2036 Apportioned to PfSH	12-Year Average Supply	Anticipated Shortfall/ Surplus 2024-2036
East Hampshire (part)	2.7	440	239	201	2,873	5,280	2,407
Eastleigh	Not up-to-date	733	968	-235	11,617	8,796	-2,821
Fareham	Not up-to-date	140	840	-700	10,080	1,680	-8,400
Gosport	2.12	83	464	-381	5,569	996	-4,573
Havant	1.8	337	937	-600	11,239	4,044	-7,195
New Forest	2.39	252	1,576	-1324	18,913	3,024	-15,889
Portsmouth	3.31	195	1,072	-877	12,865	2,340	-10,525
Southampton	5.9	528	1,275	-747	15,296	6,336	-8,960
Test Valley (part)	2.76	906	422	484	5,065	10,872	5,807
Winchester (part)	5.7	1,168	449	719	5,393	14,016	8,623
			<b>8,243</b>	<b>-3460</b>	<b>94,201</b>		<b>-41,526</b>

The actual shortfall across the Winchester Local Plan ('LP') period to 2040 (not 2036), would be even greater. Even though this plan is being assessed under the 2023/NPPF this is a critical matter.

PfSH intends to address shortfall via seven 'Broad Areas of Search' with combined capacity of c.9,700 homes. While these are relatively unconstrained, little work has been undertaken on availability, deliverability or developability, nor has capacity calculations or delivery forecasting been undertaken. Hence delivery cannot be relied on.

Given the acute affordability crisis and significant sub-regional unmet need, WCC must plan proactively above the 2023/NPPF SM, and for the 2024/NPPF SM 1,157 dpa (23,140 dwellings/Plan Period), to address the housing crisis head-on.

### *The Housing Requirement:*

#### **Question.1**

Whilst WCC provide for above the applicable 2023/NPPF SM, this will not address the housing crisis, or reflect the newly recognised SM need making use 2024/NPPF paragraph 224.

#### **Question.2**

The consequence of lower delivery of 100 in the SDNP over the Plan Period, would result in a shortfall versus need. Bloor considers a contingency buffer should be incorporated into the LP either through site allocations above SM need or reserve allocations.

#### **Question.3-4**

2024/NPPF paragraph 27b and 11b requires effective co-operation to provide for unmet needs from neighbouring areas. As set out in response to Calculation of LHN Q1 to Q3, based on the 2024/NPPF SM for 2024-2036, PfSH would have a shortfall of 38,994.

Therefore a housing need above 2023/NPPF LHN is critical and given the extent of the shortfall, providing only 1,900 dwellings towards unmet need, c. 4.8% of the total sub-regional unmet need is woefully inadequate.

At R.18 WCC included a buffer for 1,450 dwellings beyond the then SM requirement (15,628 total dwellings). This buffer was to be utilised to address unmet need and provide allowance for fluctuation to the SM prior to R.19. This was despite the identified PfSH unmet need being c. 13,000 dwellings in the 2021 SoCG.

Despite the PfSH unmet need remaining above 10,000 dwellings throughout the LP preparation period (rising to c. 39,000 dwellings in December-2024) and WCC receiving two requests for assistance from Portsmouth and Havant between R.18 and R.19, no testing of a higher housing capacity across the District within the IIA has taken place despite the Foreword of the LP (SD01) stating more than 90% of the sites promoted to the LP are not required demonstrating significant land availability in the district (paragraph 1.2). Hence in response to Q.4, unmet need contributions have not been 'calculated', the contributions are simply the R.18 buffer of 1,450 plus the c. 500 dwelling reduction in SM prior to R.19. WCC has not revisited its strategy to determine if it could deliver a greater quantum, and therefore it cannot be concluded the 1,900 dwelling allowance is the maximum which can be accommodated.

The LP therefore does not comply with 2023/NPPF paragraph 61. As the plan has been submitted for Examination, this issue cannot now be rectified as per section 33A of the 2004 Act. Therefore, it must be deemed unsound and not legally compliant.



### Question.6

**Yes.** The acute affordability crisis identified within our response to Calculation of LHN Q1 to Q3 shows there should be an adjustment to the minimum requirement to help deliver affordable housing.

The impact of the acute affordability crisis is evidenced by the Winchester SHMA (2024) which concludes a need for 368 rented affordable homes and 169 affordable home ownership dpa, a total of 537 dpa (c. 70% of the total housing requirement) between 2023-2040.

Demand for these affordable homes is evidenced by the Hampshire Home Choice Annual Report (2024) which confirms, at April-2024, some 9,899 households registered of which 1,544 were in Winchester. Compared with the figure of 9,574 recorded at 01.04.2025, there has been an overall increase of 325 (3%) households registered.

For an SM uplift SM to be effective in delivering affordable homes, these dwellings should be secured on strategic sites. This claim is supported by recent AMRs which show in 2022-2023, of the 383 net new affordable homes completed, 272 (71%) were on strategic sites (46 at Berewood; 40 at Barton Farm; and 186 at North Whiteley) and in 2023-2024, of the 331 net new affordable homes completed, 187 (or 57%) were on strategic sites (28 at Berewood; 53 at Barton Farm; and 106 at North Whiteley).

### Question.8

**No.** The Plan is ineffective, unjustified and inconsistent with the aims of national policy to significantly boost housing supply.

Paragraph 9.20 of the LP states: *“Some 64% of the district requirement is met by dwellings that have either been completed or which already have planning consent. A further 12% are expected from windfall development over the Plan period ..... Therefore, less than 25% of provision is from Local Plan allocations (either carried forward or new)”*.

Only 2,875 dwellings of the 15,465 dwelling total district housing provision is to be provided from additional allocations in this LP (table.H2 of SD01): this is c.18%. Of these 2,875, up to 1,000 are anticipated to be provided from SJMB.

Planning for less than 3,000 dwellings across a 20-year Period (c.150/year), cannot be deemed effective, justified and consistent with NPPF aims to significantly boost housing supply .

### Question.9

**No.** The Period to 2040 contradicts 2023/NPPF paragraph 22 and is thus unsound.

The NPPF expresses the 15-year period as an unambiguous minimum, to be exceeded where possible.



# Winchester Local Plan Examination

## Hearings Statement, Matter 4: Meeting Housing Need



The February-2025 LDS (ED16) indicates adoption in late 2025, without factoring in potential delays. Hence even in a best-case scenario it is not possible for the LP to look ahead over a minimum 15-year period as the Plan would already have needed to be adopted by March-2025.

As such, the LP must run at least to 2041 and provide an additional 676 dwellings (NPPF/2023 SM). This approach has been made clear by the Inspectors examining the Wiltshire LP that proposes a shorter period.

WCC's evidence base (including the SA/IIA (SD02a-d)) has not assessed an additional year, or more of development and infrastructure needs, and hence the evidence base requires updating, which would cause significant delays. Alternatively, WCC could subtract this provision from its 1,900 unmet need allowance allocated to Havant and Portsmouth, however this would further amplify its Duty to Cooperate failings as per section 33A of the 2004 Act. Either approach to rectify this situation would leave the Local Plan unsound.

### Question.10

As per our response to Q.9, the LP has a period starting in 2020. Bloor disputes the inclusion of a five-year-period before the point of adoption as the purpose of a LP is to manage *future* development. WCC's reason is set out in paragraph 2.3 of Housing Topic Paper ('HTP') (January 2025) (ED02) and this is expressly to include high levels of recent delivery (4,170 dwellings vs SM need of 3,024 dwellings). Paragraph 2.4 then states this is necessary as the NPPF makes no specific provision for past over-supply to be taken into account WCC does not want this over provision (of 1,146 dwellings) to be 'lost'.

WCC have incorrectly calculated oversupply measuring past completions against the LP trajectory, not an average annual requirement for the Plan Period. If measured against the annualised requirement, a surplus of 32 dwellings would exist.

**Table.5: WCC Annualised Housing Requirements 2011/12-2022/23**

Monitoring Year	Annualised Housing Need	Completions	Cumulative Position
2011/12	625	317	-308
2012/13	625	204	-729
2013/14	625	470	-884
2014/15	625	262	-1,247
2015/16	625	421	-1,451
2016/17	625	555	-1,521
2017/18	625	547	-1,599
2018/19	659	810	-1,448
2019/20	666	636	-1,478
2020/21	692	798	-1,372
2021/22	665	1,141	-896
2022/23	715	1,044	-567
TOTAL	7,772	7,209	-567

+ Communal Accommodation	599	32
--------------------------	-----	----

The Plan Period should start from 2024, at R.19 consultation when the housing requirement is determined and latest housing completion figures are available. While this would shorten the Plan Period, WCC's approach misunderstands the SM which takes account of past supply through the affordability uplift to determine future housing needs. This is clear from paragraph 2a-005 of the PPG, which notes when setting the baseline for the SM the current year is used as the starting point. This approach was endorsed by Inspector David Reed in relation to the North Norfolk LP Examination date 24 May-2024.

If the 2023/NPPF SM, is used for the Plan Period of 2024-2040, WCC would have a need of 10,816 dwellings (676dpa x 16). After removing completions of 3,170 new homes from the total (as per LP Table H2), WCC's supply would be 12,295 dwellings. While this is clearly sufficient to address its own needs, it is not sufficient to address the unmet need allowance of 1,900 less the 350 dwellings to be provided within the SDNP, which generates a total housing need of 12,366. A shortfall of 71 dwellings would exist.

### Question 13

Table.H3 of the LP must be updated to remove past completions and reflect the correct Plan Period (2024-2041). and also to reflect completions.

### Overall Supply of Housing:

#### Questions.1-3

Policy H1 sets a housing requirement of 15,040 (2020-2040). The LP does not contain a clear trajectory, page.218 the provided graph demonstrates how WCC anticipates the trajectory of housing completions to progress. Further detail is found within Appendix.A of the HTP. The LP's lack of detail contradicts 2023/NPPF paragraph 75.

The trajectory at page.218 of the LP demonstrates WCC is planning for growth negatively regarding historic completions. For example, in 2020-2021 804 dwellings were delivered, rising to 1,141 in 2021-2022 and 1,044 in 2022-2023. Suppressing delivery by providing a negative trajectory, which results in <200 dwellings being delivered in 2038-2039 and 2039-2040, worsens affordability.. This is wholly inappropriate given the need to "*significantly boost the supply of homes*". WCC must allocate or, as a minimum, reserve sites (namely new strategic sites) once the existing strategic allocations (LPP1) stop delivering.

While Appendix.A LP Housing Trajectory of the HTP presents anticipated rate of development for specific sites across the Plan Period, Bloor challenges contribution rates under 5YHLS Q.1-Q.3 below.

# Winchester Local Plan Examination

## Hearings Statement, Matter 4: Meeting Housing Need



The trajectory in Appendix A of the HTP is different to WCC's December 2024 AMR regarding delivery of individual sites over the five-years of the Plan Period from April-2024. Category H in the HTP includes delivery within the five-years from 2025 of submitted LP allocations which lack planning permission. The NPPF definition of 'deliverable' explains an allocated site in a development plan should only be considered deliverable where there is clear evidence completions will begin within five-years. The HTP states (paragraph 5.16) that "*landowners / developers are bringing forward proposals*" on the Bar End Depot site (W9), but no clear evidence is provided. There is no evidence provided for other sites where permission is pending. The following should be omitted from a 5YHLS assessment.

**Table.6: Sites to be Removed from the Local Plan 5YHLS Assessment**

	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
W9 Bar End	10	20				
CC1 Clayfield Park		20	20	8		
KW1 Cornerways/Merrydale			10	20	15	
SW1 The Lakes, Swanmore				17		
KN1 Ravenswood			50	100	30	20
	10	40	80	145	45	20

Furthermore, Bloor considers the housing trajectory is unrealistic and undeliverable as it is over--reliant on carried-forward allocations, which have not been delivered and lack permissions, e.g. Winchester Central Regeneration Area and the Station Approach Regeneration Area claimed to provide 550 dwellings, and the SJMB allocation (currently an operational MoD site, initially noted to become available in 2022, delayed to 2026).

For all the reasons expressed throughout this statement, this is a 'Stop Gap' LP. It has been produced ignoring the significant increase in housing need already present and further has sought to reduce the housing requirement of this LP by wrongly including over-provision. Finding this Plan sound would not provide a short term solution before the next LP review, compounding issues of affordability and unmet need. However, if this Plan is withdrawn, the development industry would mobilise to deliver housing in accordance with market demand, while WCC produces a new compliant LP.

### ***Five-Year Housing Land Supply***

#### ***Question.1***

WCC has not undertaken the assessment correctly, taking into account the most up-to-date case law, and has assessed sites as 'deliverable' when they do not meet the NPPF's definition of this. We refer to a report by Intelligent Land explaining why this is the case.

### **Question.4**

The use of the Liverpool or Sedgefield approaches relate to how a past shortfall in housing supply is considered. The NPPF and PPG are silent on whether past over-provision should be used to reduce future requirements. However, unlike past under-delivery which must be addressed, there is no basis to automatically reduce future requirements where there has been past over-delivery.

Appeal decisions have consistently rejected past over-delivery being used to reduce the 5YHLS requirement.

**APP/P0119/W/22/3300241 (South Gloucestershire, 2022)** – The Inspector ruled past over-delivery does not justify reducing future housing needs, as the five-year supply must be met in full.

**Tewkesbury BC v. S.o.S for Housing (2021, High Court Judgment EWHC 2782 (Admin))** – The court confirmed the NPPF does not allow past over-provision to offset future housing requirements, as housing needs remain ongoing and rolling.

As such, past over-provision should not be used to reduce 5YHLS and neither the Liverpool or Sedgefield approaches should apply.