



Winchester Local Plan Examination: Response to Matter 4

Land at Titchfield Lane, Wickham

Boyer

Prepared on behalf of Cateby Estates plc | March 25

1. RESPONSE TO MATTER 4

Calculation of LHN

Q1, Q2, Q3.

- 1.1 The correctness or otherwise of the Standard Method calculation, as taken forward in the Plan (with the outputs summarised in Table H1 page 215), substantively depends on when the Plan period commences, and in which year the Standard Method calculation is based.
- 1.2 As set out in our Statement for Matter 3 and below, commencing the Plan period in 2020 is not justified. Rather, it should commence in 2024, and the Plan period should be extended by one year to account for more realistic timescales for eventual adoption (if the Plan is found sound).
- 1.3 With reference to our responses below and noting the Statement prepared by the HBF for this matter, Catesby considers that the scale of unmet needs arising within nearby Local Authorities means that it would be appropriate to plan for a higher LHN figure than the minimum number established through the Standard Method.

Housing Requirement

Q1.

- 1.4 No, the South Downs National Park Authority (SDNPA) has made representations to indicate that it does not consider 350 homes achievable within the National Park Area. On this basis, Policy H1 should instead assume a contribution of 250 homes within the National Park.

Q2.

- 1.5 There will be a shortfall of 100 homes, which the Local Plan should be revised to address, in addition to addressing wider concerns regarding the proposed housing trajectory. Moreover, the Updated Housing Topic Paper (in paragraphs 4.32 to 4.34) indicates that this shortfall could be addressed via the Plan's 'unmet needs allowance'. However, as detailed below, the assignment of this allowance to Havant Borough Council and Portsmouth suggests there is no clear allowance for meeting the unmet needs of the SDNP.

Q3.

- 1.6 Yes. An allowance (which may be more appropriately termed an 'apportionment' and hence be more categoric) to accommodate unmet needs arising is justified and consistent with NPPF paragraphs 11 and 61. Indeed, Winchester District is comparatively less constrained, and WCC has long acknowledged that it can accommodate a level of unmet needs arising from neighbouring Local Authorities.
- 1.7 Catesby's view is that the Plan should, in fact, go much further to address a significantly higher share of the unmet need now arising in the PfSH area.

Q4.

- 1.8 In essence, this is a question for the Council to address. However, the 2024 Housing Topic Paper, at paragraphs 4.46 to 4.52, suggests that the 1,900 figure is simply based on an assessment of available development capacity (i.e., through the SHELAA and Site Selection Topic Paper, SD10b). It is telling that the Regulation 18 Local Plan also identified 1,450 units of surplus supply that could be used as a 'buffer' (within WCC's requirement) or, alternatively, to address unmet needs.
- 1.9 WCC 'offered up' the 1,900-home figure as part of PfSH negotiations and formally committed this figure in the PfSH Spatial Position Statement (December 2023). The total level of unmet need identified in the 2023 Statement is 11,771 homes, with a shortfall of 9,700 homes (in the PfSH area) argued to be capable of being addressed within the 'Broad Areas of Search' by 2036 (something Catesby considers unlikely, given the timescales involved and uncertainties regarding capacity).
- 1.10 The level of unmet need identified in the 2023 Position Statement is also suspected to be under-reported, particularly when it is noted that previous Position Statements / SoCG identified levels of unmet need ranging up to circa 29,000 homes (as per the 2016 Position Statement). Likewise, as per the relevant SoCG (SD08i and SD08e), Portsmouth and Havant have identified unmet needs of 4,377 and 4,309 homes, respectively (and 8,686 homes in total), and these SoCG pre-date the December 2024 NPPF and the associated uplift in the Standard Method LHN.
- 1.11 Following from the preceding (and cross-referencing to the Matter 4 Statement prepared by the HBF), it must also be recognised that the combined Standard Method figure for the PfSH Authorities rises considerably under the December 2024 NPPF to 7,422 dpa. This results in a total LHN of 89,064 homes from 2024 to 2036, against a projected supply of 57,695 homes. This infers an unmet shortfall of -31,369 homes. Therefore, the 'real' level of unmet need within the PfSH area is markedly higher than the 2023 Position Statement anticipates.
- 1.12 Winchester's contribution of 1,900 homes, whilst welcomed by Portsmouth and Havant, is marginal in the above context. It appears to have been arrived at simply by identifying 'leftover' capacity through the SHELAA and Site Selection exercise. This was subsequently volunteered in the 2023 PfSH Position Statement and ultimately taken forward in the submitted Local Plan.
- 1.13 The figure does not appear in any sense to derive from a proactive attempt to address the true scale and prevailing acuteness of unmet needs, nor the more limited capacity of constrained LPA's such as Havant and Portsmouth, but also Gosport and the New Forest (both the National Park Authority and the District LPA). Nor (as set out in our Matter 1 and Matter 3 Statements) was any credible testing of higher growth options in the IIA.

Q5.

- 1.14 Notwithstanding our views on the scale of unmet needs and the limited degree to which the Plan addresses this, Catesby considers that any apportionment must be specific to each LPA. This is in the interests of effective planning, given that various Local Plan examinations in the PfSH area will need to consider which LPA's unmet needs are being met and by whom.

Q6.

- 1.15 The latest available lower quartile affordability ratio for Winchester (2023) is 12.05 for the Winchester District, compared to 7.25 across England as a whole. Figure 2.3 of the SHMA 2024 Update (HA01) acknowledges the comparative unaffordability of housing within the district.
- 1.16 The SHMA Update further identifies a need for 510 affordable homes annually (368 dpa 'affordable/rented' and up to 142 dpa 'affordable home ownership'). This represents 67.5% of the overall average annualised housing requirement (755 dpa) identified for the Plan area (i.e. excluding the National Park).
- 1.17 This level of affordable housing need will not be delivered, noting that Policy H6 proposes an affordable housing tariff of between 25% and 40% for new housing developments, depending on a site's location and constraints. This points to the need to increase the housing requirement further and allocate additional market-led sites to unlock additional affordable housing.
- 1.18 As an adjacent point, the Plan's proposal to restrict the delivery of greenfield sites in favour of the early delivery of previously developed land (as per Policy D6, then reflected in the phasing envisaged in Policy H2) will also do little to address the need for affordable housing, when it is indeed acknowledged (in Policy H6) that previously developed sites are typically less able to provide affordable housing.
- 1.19 There is a clear case for increasing the minimum housing requirement to more fully meet affordable housing needs. This would be facilitated by allocating additional greenfield sites and deleting those measures in the Plan designed to artificially restrict supply.

Q7.

- 1.20 By failing to allocate sufficient new sites and applying a brownfield-first / phased approach, the delivery of affordable homes will be restricted and delayed, alongside the provision of houses for families with children, older people, and others within the community who require new homes. In this regard, the Plan is not positively prepared nor consistent with national planning policies.

Q8.

- 1.21 No, Catesby maintains that this Local Plan aspires to do only the 'bare minimum' rather than significantly boost the supply of homes. Indeed, whilst the Plan nominally 'makes provision' for 15,465 homes, it actually allocates just 2,875 homes at Policy H2 (equating to 144 dpa over the proposed 20-year Plan period).
- 1.22 All other sources of identified supply (e.g., windfall, recycled allocations, existing commitments) are not contingent on this Plan's adoption. Noting this, it is conceivable that the failure of the Plan at Examination and the consequential application of NPPF para 11(d) to decision-making would provide a more significant uplift in new housing supply.

- 1.23 As set out in the Housing Topic Paper 2024 (SD10g), the purpose of commencing the Plan period in 2020 (for a Plan unlikely to be adopted before 2026) is to try to reduce the need for new allocations. Likewise, the trajectory presented on page 218 of the Plan indicates how the Council proposes to rely on a strategy of phasing / artificial restriction to stretch the supply of homes across the Plan period.
- 1.24 Moreover, if the Local Plan is found sound, WCC (or its successor Local Authority) will, in accordance with the transitional arrangements, need to move quickly to prepare a further new Local Plan under the new Plan-making system. This subsequent Plan will have to address a level of housing need (under the current, post-December 2024 Standard Method) that is by orders of magnitude greater than the LHN figure identified in the Proposed Submission Local Plan.
- 1.25 As such, it is odd that the Local Plan should, in effect, plan for a lower level of housing delivery than recent completion rates have shown to be possible (as set out in the Trajectory on page 39 of the updated Housing Topic Paper (ED02)). Overall, in failing to allocate a meaningful number of new sites (and seeking to justify this by commencing the Plan period in 2020 and proposing to phase future supply), the Plan fails to positively address NPPF paragraph 60.

Q9.

- 1.26 No, the latest LDS (ED16, published in February 2025, after the Regulation 19 Consultation) makes it unrealistic to assume that the Plan will be adopted in Q3 2025, especially when considering the breadth of issues identified through this Examination so far.
- 1.27 If the Plan can be found sound and adopted before 31 March 2026, it will only cover 14 years from the point of adoption. An additional year should be added to the end of the Plan period to address NPPF paragraph 22.

Q10.

- 1.28 Firstly, and as noted in our Statement for Matter 3, there is no requirement (in the NPPF or PPG) for a 20-year Plan period and no corresponding necessity to look back 5 or 6 years from the expected adoption of the Plan. The PPG (2a-012-20190220) indeed states that the Standard Method “*provides authorities with an annual number, based on a 10-year base line, which can be applied to the whole plan period*”.
- 1.29 With reference to the affordability uplift (as operated with respect to the December 2023 NPPF and related PPG), the adjustment made reflects the ONS published affordability ratio, which the guidance identifies as capturing patterns of worsening or improving affordability. If there is under-delivery, the ratio worsens, and if there is over-supply, the ratio improves. In both cases, this would be reflected in the corresponding Standard Method calculation.
- 1.30 As such, to ‘capture’ alleged oversupply directly, in commencing the Plan period in 2020 whilst at the same time using annually calculated Standard Method figures from 2020/21

onwards¹, is to 'double count'. Put more simply, the reduction in the calculated LHN over the four years 2020/21 already reflects (through the affordability uplift) comparatively high delivery rates in recent years.

- 1.31 As a further remark, it is noted that in paragraphs 3.12 to 3.19 of the Housing Topic Paper Update (ED02) the Council seeks to argue that there is no correlation between the affordability ratio / Standard Method affordability multiplier and housing completions locally, such that WCC are disputing the efficacy of a key aspect of the Standard Method. Yet, in paragraph 3.17 of the Topic Paper, it is acknowledged that high levels of dwelling completions may *"At most... help to slow increases in house prices and might ease affordability in the longer term"*.
- 1.32 The above is a significant concession, as the Council acknowledges some relationship between housing completion levels and affordability. Therefore, it must follow that the Council's approach to the Plan period blurs inputs into and outputs derived from the Standard Method calculation, leading to double counting.

The Overall Supply of Housing

Q1.

- 1.33 No, as detailed below, the trajectory relies very heavily on a 'deliverable' supply of homes from existing commitments at the point of adoption, and the supply tapers down quickly thereafter. What that Plan has failed to do (because it doesn't allocate much at all) is properly plan for years 6-10 and 11-15. This, in turn, necessitates the Council's proposal to artificially restrict the granting of planning permission on greenfield sites.

Q2.

- 1.34 The Council, in ED02 paragraph 6.8, acknowledges that in the absence of its proposed phasing strategy, that *"completions would peak in 2028/29 and start to fall off thereafter. Annual completions would drop below 795 (the level needed to maintain a 5-year supply for decision-making purposes."*
- 1.35 This highlights how the trajectory, in the early part of the Plan period, relies heavily on existing commitments without providing sufficient new allocations to properly 'bridge the gap'. If the Plan allocated a balanced range of greenfield additional sites at different parts of the settlement hierarchy, these sites could be expected to benefit from planning permission and be able to provide completions at the point when the trajectory otherwise begins to reduce.

There are a number of threats to delivery, including the reliance sites, which, despite being allocated in LPP1 or LPP2, have still not come forward for development. For example, Policy CC1 concerns 'Clayfield Park' (48 homes), which was allocated in LPP1 and has failed to come forward for development, given that it is currently occupied for commercial use.

Likewise, the 'Winchester City Regeneration Scheme' and 'Station Approach' are identified in

¹ I.e. 2020-21; 685 dwellings, 2021-22; 666 dwellings, 2022- 23; 707 dwellings, 2023-24; 691 and then 676 dpa for the remainder to the Plan period.

the trajectory as providing completions within five years. However, these complex urban redevelopment projects have not come forward yet despite being allocated in the existing Development Plan. Neither iteration of the Housing Topic Paper provides clear details to justify the projections for these sites.

Similarly, the newly proposed allocation at Sir John Moore Barracks (Policy W2) is subject to several uncertainties. It is unclear how many homes the site will provide (the policy identifies a range of 750 to 1,000 units). There is also scope for slippage on this challenging brownfield site, noting that the Council expects first completions in 2028/29. This projection seemingly also depends on Outline planning permission being secured in 2026, but no application has yet been submitted.

Q3.

- 1.36 No. With reference to our Regulation 19 representations, the Windfall Assessment Report (2021) does not provide any compelling evidence that the conversion of office and agricultural buildings (as a previously important source of windfall supply) will continue at the same pace until the end of the plan period. The Council also maintains several Article 4 Directions to restrict conversions further.

Q4.

- 1.37 With reference to our previous comments and those below, no.

Q5.

- 1.38 The NPPF does not support a brownfield-first approach, and (as detailed below) the approach proposed in Policy H2 outright conflicts with NPPF paragraph 60. Furthermore, it is unclear why allocations on previously developed land should be expected to come forward more easily and quickly than those on greenfield sites and, hence, should be prioritised.
- 1.39 Indeed, the widely cited Lichfield's 'Start to Finish' report (Version 3, 2024) sets out research into the delivery of different types of development sites. The report finds that large brownfield sites deliver more slowly than greenfield sites, noting that the average build rate for greenfield sites is 34% greater than that for equivalent brownfield sites.
- 1.40 Therefore, the reliance on brownfield sites in the first half of the proposed Plan period will likely cause under-delivery. Far from creating a 'more even trajectory', Policy H2 will likely delay delivery overall and undermine the capacity to maintain a rolling 5YHLS. The approach is not justified, positively prepared or effective, and it is challenging to imagine how delaying the delivery of new homes would be consistent with the prevailing national policy context.

Q6.

No, as indicated, the Council acknowledges that it will struggle to maintain a 5YHLS following the adoption of the Plan, particularly when a 20% buffer is to be applied. The Government requires the application of this 20% buffer from 01 July 2026 (for decision-taking) precisely to ensure that the housing supply is not restricted where Local Plans that do not address the

December 2024 Standard Method are adopted.

Instead of addressing issues in the trajectory through additional allocations to significantly boost housing supply, WCC promotes an artificial mechanism to evade the consequences of not doing so. The effect is that a sufficient amount and variety of land will be unable to come forward without delay, in conflict with NPPF paragraph 60.

Five-Year Housing Land Supply

Q1.

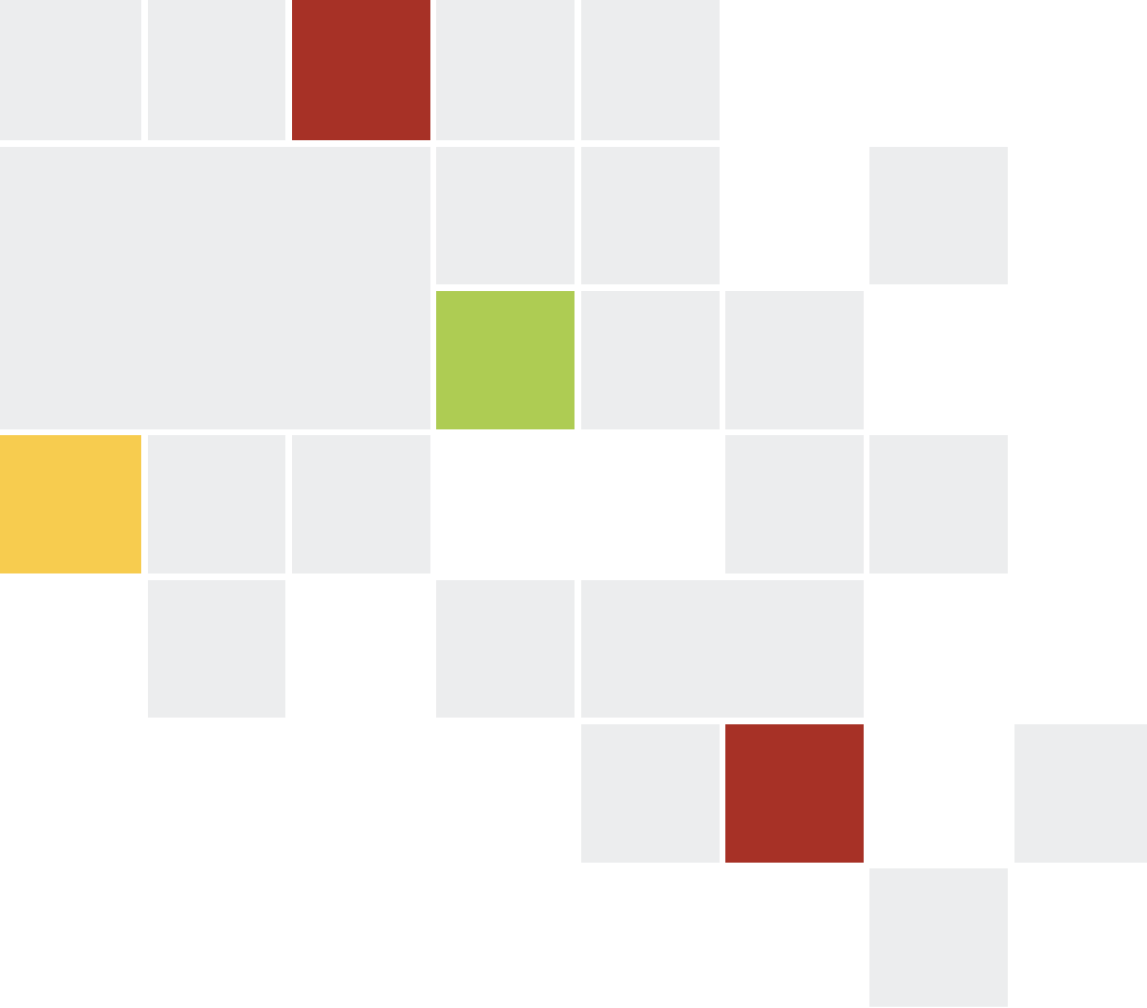
- 1.41 Whilst Catesby defers to those parties undertaking a detailed 'line-by-line' review of the trajectory, it is apparent that the Plan will not secure a 5YHLS upon adoption, particularly when noting that from 01 July 2026, a 20% buffer will need to be applied to the housing requirement.

Q2.

- 1.42 Conspicuous by their absence are site-specific statements of common ground relating to sites identified for allocation and sources of supply that are otherwise said to be 'deliverable', including when these do not benefit from detailed planning permission.

Q3.

- 1.43 With reference to our previous comments, there is no compelling evidence to support the rate of expected windfall contribution.



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