



Winchester Local Plan Examination: Response to Matter 4

Land at Pitt Vale, Winchester

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Prepared on behalf of Vistry Homes Ltd | April 25

REPORT CONTROL

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1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Boyer on behalf of Vistry Homes Ltd ('Vistry'), in response to the Inspector's Stage 1 Matters, Issues and Questions ('MIQs') in relation to the examination of the Winchester District Local Plan 2020-2040 ('Local Plan').
- 1.2 Boyer has prepared this statement in response to Matter 4: 'Meeting Housing Need'.
- 1.3 This Hearing Statement has been prepared in respect to the promotion of Land at Pitt Vale, Winchester. The comments in the Hearing Statement relate only to those questions which are pertinent to Vistry's interest.
- 1.4 Representations were submitted by Boyer to the Regulation 19 Consultation on behalf of Vistry.

2. RESPONSE TO MATTER 4

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)?

- 2.1 A Local Housing Needs Assessment has not been undertaken, with the Local Plan adopting the requirement set out in the Standard Method. Table H2 within the Local Plan sets out the need for 13,565 arising from the Standard Method.
- 2.2 However, Vistry do not consider the Plan Period should commence in 2020 and therefore consider the Standard Method requirement is incorrect. This is also mentioned in the Matter 3 Hearing Statement. There is no robust justification for commencement in 2020 and Vistry consider the Plan should commence in accordance with the base date from which the housing requirement monitoring period is calculated, namely 2024.

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 Whilst the Local Plan provides for 1,900 homes to meet unmet need, the level of unmet need is considered significantly higher. The level of unmet need forms 'substantive evidence' which indicates the Local Plan should plan for a higher number of homes. The Housing Topic Paper Update (2025) notes that the split for unmet need would be 30% to address a proportion of Portsmouth's unmet need, and 70% to address a proportion of Havant's unmet need).
- 2.4 The Partnership for Southern Hampshire (PfSH) Spatial Position Statement (2023) (which excludes Winchester) confirms there is unmet need of 11,000 homes between 2023 and 2036. However, this figure is based on the 2023 Standard Method and the actual figure for unmet need will be significantly higher when compared to the new Standard Method.
- 2.5 The PfSH Spatial Position Statement confirms that when compared to the 2024 Standard Method, the unmet need rises to 31,369 homes. There are physical constraints on some of the authorities in PfSH, namely Havant, Portsmouth, New Forest and Gosport, which will make it difficult for them to achieve the quantum of housing required for them under the 2024 Standard Method. Whilst the submitted plan is being examined under the 2023 NPPF, the direction of travel for housing need is self-evidently much higher than the submitted Plan's

target. To provide greater robustness to the current Plan's ability to remain up to date, a higher number of homes should be required of this Plan to address the already significant and growing unmet needs.

- 2.6 With specific regard to Havant and Portsmouth, their housing requirement has increased through the 2024 Standard Method and it their level of unmet need will therefore also have increased. The provision of 1,900 homes is therefore based on an outdated figure.

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 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.

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?

- 2.8 The number of homes allowed for within the Plan Period should be increased to take into account the 100 homes shortfall within the SDNP.
- 2.9 Whilst the Local Plan contains 1,900 homes to account for unmet need, according to the SoCGs with Havant and Portsmouth, there would be no unmet need allowance remaining to contribute towards the shortfall in SDNP.

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 principle of Winchester including an allowance for unmet need complies with the NPPF paragraphs 11 and 61. Winchester is less constrained than other Districts in Southern Hampshire and it is therefore appropriate that the District provides an allowance for unmet need.

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?

- 2.11 The Housing Topic Paper (2024) suggested that the unmet needs allowance of 1,900 is based on an assessment of available development capacity. Indeed, where 'Levels of Growth' reasonable alternatives are considered on pages 588 to 595 of the IIA (July 2024),

the Council essentially relied upon already shortlisted HELAA sites and the identified preferences of Parish Councils.

- 2.12 As such, the potential to 'cast the net wider' to identify additional sites to address a larger share of unmet needs does not appear to have been considered.
- 2.13 The Integrated Impact Assessment also demonstrates there has been no consideration of meeting unmet needs with paragraph 2.33 noting *"At the time of preparing the Strategic Issues and Priorities document and Regulation 18 Local Plan, the options considered related to meeting the needs of Winchester District, not the unmet needs of neighbouring authorities."* Whilst the IIA does consider options with higher levels of housing, it is not clear whether this incorporates unmet need or rather different spatial strategies. No specific test was undertaken to incorporate a higher level of unmet need itself.
- 2.14 It is telling that SoCGs with Havant and Portsmouth were missing at the Reg 19 consultation stage with the SOCGs submitted subsequently to the Inspector. This suggests the unmet need allowance of 1,900 homes was not agreed in advance of the preparation of the Local Plan. These SOCGs with Havant and Portsmouth confirmed an unmet need of 4,309 dwellings and 4,377 dwellings respectively. Whilst the unmet need allowance of 1,900 homes goes some way towards supporting Havant and Portsmouth, the figure is clearly significantly lower than the unmet needs from these two neighbouring authorities.
- 2.15 As noted above, the PfSH Spatial Position Paper confirms the current levels of unmet need are based on the 2023 Standard Method and the figure will significantly increase when calculated according to the 2024 Standard Method.

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)?

- 2.16 To be effective, the relevant policy should provide detail on which authority would benefit from the unmet need allowance and what proportion they would each receive. This would allow reassurance for the recipient authorities, especially during the preparation of their Local Plans, and provide transparency through monitoring of the unmet needs planning to be met.

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?

- 2.17 The latest ONS publication (2023) indicates that the median (workplace-based) house price affordability ratio for the District was 13.32, having risen from 9.93 in 2013, and 5.62 in 1997. For comparison, England's 2023 ratio stood at 8.18. A similar pattern is reflected in lower quartile affordability ratios (the entry level for home ownership), with the 2023 figure for Winchester District being 12.05 compared to 7.25 across England as a whole. Indeed, the comparative unaffordability of housing within the District is acknowledged at Figure 2.3 of the SHMA 2024 Update.

- 2.18 The 2024 SHMA Update confirms there is an increased affordable housing need from that identified in the 2020 SHMA. Furthermore, the SHMA 2024 document identifies a need for 495 affordable homes annually (368 dpa affordable/rented and up to 127 dpa affordable home ownership). This represents 65.5% of the overall annualised housing requirement (755 dpa) identified for the Plan area (i.e. excluding the National Park).
- 2.19 This level of affordable housing need will clearly 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 for the Council to increase the minimum housing requirement further, and importantly to allocate additional market-led sites to unlock delivery of much needed additional affordable housing to meet more of the objectively assessed affordable housing needs in the District.

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?

- 2.20 To ensure compliance with NPPF paragraph 62, sufficient sites should be allocated across the Plan Period and greenfield sites (which are well known to provide source for the highest quantum of affordable housing), should not be artificially held back until later in the Plan Period. This would be the most effective way in ensuring different groups in the community are catered for across the plan period, rather than affordable housing delivery only becoming more into focus toward the end of 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)?

- 2.21 No. The Local Plan is heavily reliant on extant planning permissions and existing allocations which have been carried forward into this Plan. Out of the 15,465 homes provided for in the Plan, only 2,875 homes are allocated on new sites.
- 2.22 The Housing Topic Paper (2024) justified the commencement of the Plan Period in 2020 in order to: *"...allow some of the Council's recent good performance in terms of housing completions to be taken into account, as there is no specific provision in the NPPF or Planning Practice Guidance for past over-supply to be taken into account and this would otherwise be lost"*. These completions taken into account in the supply, significantly reduces the need to allocate new sites.
- 2.23 In other words, the Local Plan seeks to allocate sufficient homes to meet future supply, whilst relying on historic completions. This is demonstrated in the trajectory in the Housing Topic Paper Update (2025) which shows reduced completions towards the end of the Plan Period.

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?

- 2.24 If the Plan is found sound in 2025 then the Plan would cover a 15 year period. If the Plan is not found sound until early 2026, the Plan would then cover a 14 year period: therefore in conflict with the NPPF. In that occurrence, the Plan Period should be extended by one year.

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?

- 2.25 The Standard Method incorporates an affordability uplift, based on ONS data. The ratio worsens with under-delivery and improves with over-delivery and any past under or over delivery is therefore captured in the affordability uplift.
- 2.26 To apply the Standard Method, and then to use past overprovision effectively acts to double count.
- 2.27 The Council state in paragraphs 3.12-3.19 of the Housing Topic Paper Update (2025) they do not consider there to be a direct link between past completion rates and affordability. However, paragraph 3.17 of the Housing Topic Paper Update notes *"Housing delivery in Winchester has improved strongly since 2018/2019. This may be contributing to some of the slower rates of house prices growth seen in recent years in Winchester and should this continue, this will assist in easing affordability pressures in Winchester"*. This suggests the Council do appreciate that affordability is impacted by completion levels, despite their comments in the Housing Topic Paper Update (2025). Notwithstanding, the Plan should be looking to the future rather than relying on the past five-year period.

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?

- 2.28 The trajectory demonstrates that completion will be high at the front end of the Plan Period, when it is dependent on sites already benefiting from planning permission with limited completion towards the end of the Plan Period. The Plan therefore fails to provide a sufficient supply for the second half of the Plan Period.

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

- 2.29 The trajectory is not realistic or deliverable. There is a huge reliance within the Plan on extant planning permissions and sites which already benefit from an allocation. Some of these sites have been allocated since 2013 and are yet to come forward; however, the Plan is predicated on them being deliverable in accordance with the trajectory. This reliance also results in significant levels of completions in the early part of the Plan with limited completion in the second half of the plan (c. 2029 onwards).
- 2.30 Indeed, completions after c. 2032 would fall below 795 dpa and the Council would not be able to maintain a five-year housing land supply. This demonstrates the need to allocate additional new sites in order to prepare a Plan which actually intends to maintain a minimum five-year housing land supply throughout the plan period.
- 2.31 The threat to delivery comes from the reliance on sites which have been previously allocated in the LPP1 and LPP2, in some instances allocated since 2013. To date these sites have not come forward and no evidence is provided to demonstrate why there is such confidence they can be delivered soon.

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?

- 2.32 A Windfall Assessment Report (2021) forms part of the evidence base of the Local Plan and includes 'conversions' within windfall. Paragraph 5.63 notes that the conversions within the windfall assumption largely result from changes to permitted development rights, such as the conversion of agricultural buildings to residential. Not only does the document not consider the availability of existing agricultural buildings, but it is also assumed there is not an inexhaustible supply of barns/agricultural buildings that can be converted. There is also limited information on the impact on conversions due to Article 4 Directions.
- 2.33 Furthermore, with regards to the conversion/redevelopment of sites in commercial and leisure use, the Windfall Assessment Report makes generalised assumptions about the impact of Covid and other trends in the commercial property market that may or may not result in the 'loss' of commercial floorspace to residential. However, the report does not detail how these influences may affect supply.

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?

- 2.34 No, as set out in our HPS to Matters 2, 3, and 5, there is too high a reliance on extant permissions and sites which benefit from an existing allocation. Greenfield allocations are being held back until later in the Plan Period, but this is not sufficient to ensure the Council can maintain a five-year housing land supply for the duration of the Plan Period.

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?

- 2.35 There is no justification to hold back greenfield site allocations until 2030. The NPPF paragraph 60 is clear that land with planning permission should be developed without delay.
- 2.36 The reasoning for holding back greenfield sites is to encourage brownfield sites to come forward first. However, the delay of greenfield sites does not have any impact on the delivery of a brownfield site in reality. Furthermore, brownfield first policy is not written to preclude greenfield development. Brownfield policy in the 2023 NPPF is to give priority to brownfield. It is not written in absolute terms before greenfield development can come forward.
- 2.37 Lichfield's 'Start to Finish' document (3rd edition) highlights that build-out rates are considerably lower on brownfield sites than their greenfield counterparts. Therefore, the reliance on brownfield sites in the first half of the Plan-period will likely give rise to under-delivery in the early – mid plan period. Hence, the approach undermines the Plan's effectiveness as a whole.

6. In the absence of a stepped trajectory would the approach taken by the Council be effective, justified and consistent with national policy to significantly boost the supply of homes (NPPF paragraph 60)?

- 2.38 No, as set out above, the approach taken by the Council would not be effective or result in boosting the supply of homes. The trajectory is clear that the Council cannot maintain a minimum five year housing land supply over the lifespan of the Local Plan. The obvious way to address this would have been to allocate additional new sites in this plan.

Five year housing land supply

In the Council's Housing Topic Paper Update (ED02) it states that the Plan is able to demonstrate a five year housing land supply on adoption of 6.7 years against an annual requirement of 679 dwellings home per annum (2025-2031).

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?

- 2.39 The Plan notes it is capable of achieving a five-year housing land supply at the time of adoption.
- 2.40 However, as noted earlier, Vistry consider the Plan Period is incorrect and the historic completions should not be taken into account. This, coupled with the 20% buffer to be applied from 1 July 2026 suggest that the Council would not be able to demonstrate a five year housing land supply. Indeed, assuming that the Plan Period is 2024/2025 – 2040/2041, the Council would need to deliver 676dpa with an additional 111dpa for unmet need (1,900 /

Plan Period). This would equate to a requirement for 4,765 homes across the five year period of 2026-2031, resulting in a 4.58 year supply.

2. Which specific sites make up the extant permissions included within the housing trajectory and what is the evidence that they are deliverable as per the NPPF definition?

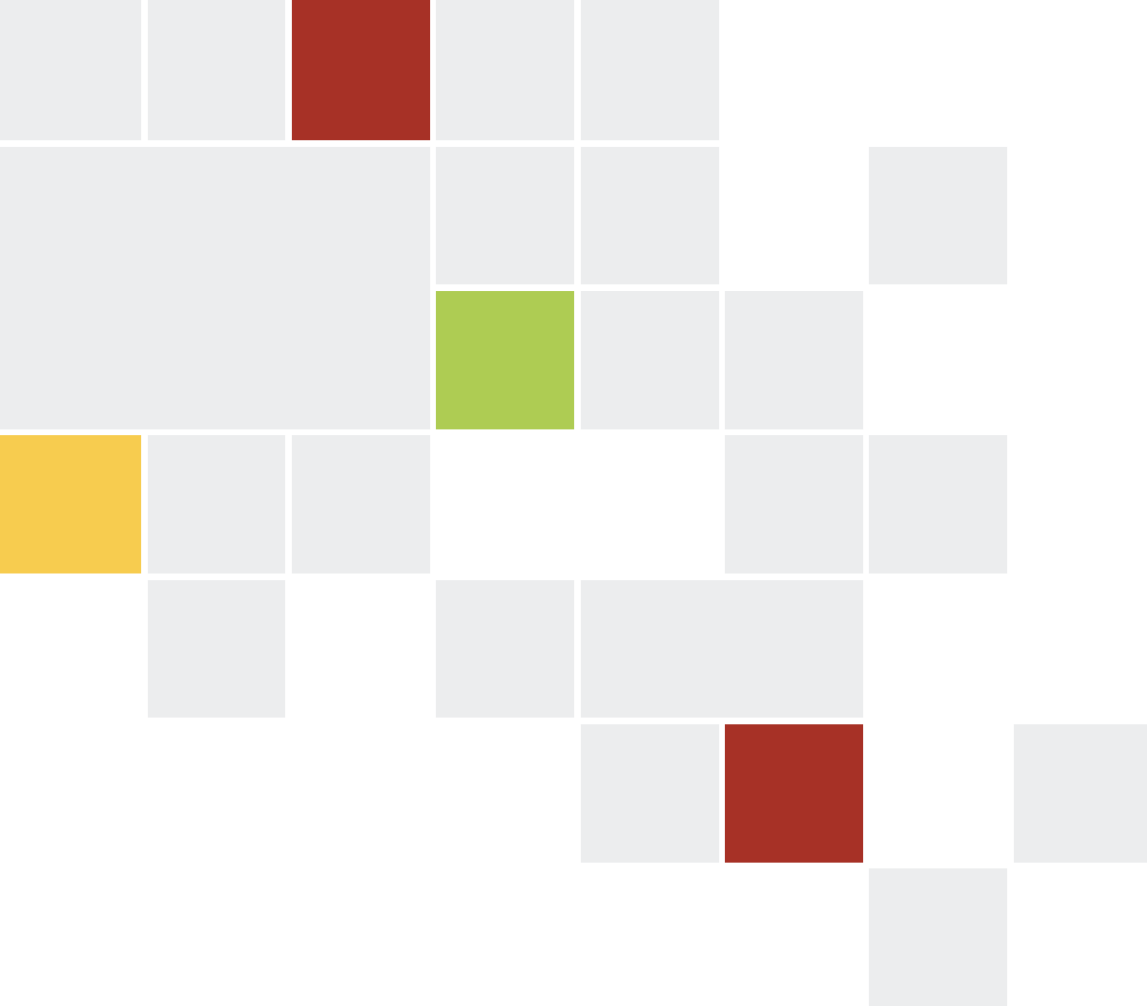
- 2.41 No evidence has been provided to demonstrate the extant planning permission are deliverable or indeed why there has been a delay to them coming forward. Such evidence is needed to provide any confidence in the Local Plan.

3. What is the compelling evidence that windfalls will provide a reliable source of supply, in terms of the Strategic Housing Land Availability Assessment (SHLAA), historic windfall delivery rates, and expected future trends, as set out in NPPF paragraph 72?

- 2.42 Comments on the windfall assumptions have been discussed earlier in this Statement in response to Q3.

4. The Council's calculation applies the 'Liverpool Method.' What is the reason for this and in so doing would this be sound and accord with NPPF paragraphs 69 and 77?

- 2.43 Evidence base documents are silent on the reasoning for applying the Liverpool Method and justification should be provided.
- 2.44 When considering the Sedgefield and Liverpool methods, the tables on pages 40 and 41 of the Housing Topic Paper Update both demonstrate the Council will be unable to maintain a five-year housing land supply by 2035/2036 for Sedgefield and 2036/2037 for Liverpool. This is without the 20% buffer which will be applied from 1 July 2026. Both methods therefore demonstrate the failure of the Plan to provide the minimum sufficient homes across the Plan Period.



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