

Examination of the Winchester District Local Plan 2020 - 2040

Matter 4 Hearing Statement: Meeting Housing Need

Issue: Would the overall strategy and provision for housing development be justified, effective and consistent with national policy?

On behalf of Foreman Homes Limited and VIVID



MASTER

LAND & PLANNING

Calculation of Local Housing Need (LHN)

Q1: 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)?

1. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

Q2: 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. Yes. PPG paragraph 10 confirms that an authority agreeing to take on unmet need from neighbouring authorities represents a circumstance where it may be appropriate to consider a higher housing need. The PfSH Spatial Position Statement Dec 2023 (Document ref: PSH01) at paragraph 6.24 confirms a major need to provide new homes within the PfSH for a growing and ageing population and for an increasing number of households. Table 1 identifies a shortfall of over 11,700 homes across all PfSH local authorities (as of 2023). Paragraph 6.33 sets out the approach to addressing these needs which includes a short to medium term approach for five local authorities to exceed the NPPF 2023 standard method-based housing needs in their respective local plan areas, Winchester being one of these.
3. The SoCGs prepared between Winchester District and Havant Borough Council (Document ref: SD08e), and Winchester District and Portsmouth City Council (Document ref: SD08i) confirm the position set out in the PfSH SPS and Winchester's agreement to take on a portion of the unmet needs from these neighbouring authorities.
4. Whilst it is recognised the shortfall identified in the SPS represents only a snapshot in time, the revised 2024 Standard Method has resulted in a significant uplift to the overall housing needs across the area. Indeed, the unmet needs figures identified by Havant and Portsmouth in their SoCGs (prepared on the basis of the 2023 Standard Method) are already far in excess of the shortfall set out in Table 1 of the SPS; with an additional shortfall of 1,706 dwellings identified by Havant and 3,994 by Portsmouth.
5. The shortfall identified by the SPS must therefore be considered a minimum. No evidence has yet been published by the PfSH on the updated situation. There is an obvious acute housing shortage with the delivery of homes needed now. Consequently, there is clear substantive evidence to demonstrate why an uplift to

the housing need figure, which should go beyond that set out in the draft Local Plan, is appropriate.

Q3: Are there other relevant factors to be taken into account in calculating the LHN?

6. We also comment below on affordable housing.

The housing requirement

Q3: 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?

7. Yes. As explained above, there is clear evidence to demonstrate why an uplift to the housing requirement, above the LHN, is appropriate.
8. Given the unmet needs have been identified by the PfSH, it is expected that unmet needs allowance of 1,900 will be delivered within the part of the district falling within the PfSH. We question why this area has not been explicitly defined on the Policies Map or within the Plan? Nonetheless, the area coincides with Winchester Districts 'South Hampshire Urban Area' (SHUA). The table on page 367 of the Draft Plan Local Plan (Document ref: S001) confirms an additional supply of only 500 units within the SHUA. A shortfall of 1400 units therefore exists. No evidence has been put forward to demonstrate how these 1900 units will be delivered within the PfSH part of the District.
9. It is noted that there are contradictory statements in the Housing Topic Paper Update January 2025 (document ref: ED02). Paragraph 4.25 states '*that the whole of the Local Plan's 'unmet needs allowance' should be apportioned to these authorities.*' However, at 4.34 it is recognised that the South Downs National Park Authority support the Councils approach towards providing an unmet needs allowance and '*that part of this could be used if necessary to resolve potential shortfalls in the SDNP part of Winchester District.*' This is misleading and should be clarified.

Q4: 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?

10. The Housing Topic Paper Update (ED02) does not set out the methodology for how the unmet needs allowance has been calculated.
11. The SoCGs (SD08e and SD08i) were prepared prior to the revised Framework being published. The Local Housing Need has increased for both Havant (now 892, an increase of over 75%) and Portsmouth (now 1,021, an increase of approximately 14%). This will result in a significant increase to the unmet needs, which must be accounted for.

12. It has not been made clear why additional housing is not planned for to meet the unmet needs of these districts to a greater extent or indeed, in full. The plan has not been positively prepared to provide a meaningful contribution to the wider unmet needs, and there is a woeful lack of justification for how the council arrived at this figure, which must be increased.

Q5: 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)?

13. The unmet needs allowance apportioned to each of the Councils should be defined within the Plan, and should be expressed as a percentage, as set out in the Housing Topic Paper Update January 2025 (ED02).
14. The defined allowance should not preclude a higher delivery of housing being apportioned to the unmet needs of these neighbouring authorities if possible.

Q6: 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?

15. Yes. The PPG sets out that an increase in the total housing figures may need to be considered where it could help deliver the required affordable homes (Paragraph: 024 Reference ID: 2a-024-20190220).
16. An update to the Winchester Strategic Housing Market Assessment was completed by Icenii in July 2024 (document ref: HA01). The report identifies an overall need of 558 affordable homes per year to meet the needs across Winchester District. This need represents 82% of the Local Housing Need Figure derived from the standard methodology. Meeting this need is not deliverable based on the submitted Strategic Policies and policy compliant levels of affordable housing.
17. In order to meet the affordable housing needs, a requirement of 1,395 dwellings per annum would be needed (based on the threshold of 40% affordable housing delivery and assuming all sites can contribute). An uplift in the housing requirement is justified, which is best set out by the December 2024 LHN calculation which is higher than proposed in this Plan.
18. Given the clear acute need for more affordable homes in Winchester District, we submit that there are justified reasons for an uplift in the overall housing requirement, as set out in PPG. As such, the approach taken to set the housing requirement has not been positively prepared.

Q8: 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)?

19. No. The over-reliance on existing permissions and commitments does not represent positive planning for additional housing needs. There are concerns relating to the deliverability of sites carried forward from the existing plan which are still yet to be brought forward for development. The Council must be assured that all extant allocations remain deliverable. This is also of relevance to the FHL representations concerning restrictions on phasing of Policy CC2, whereby the Local Plan unreasonably favours Policy CC1.
20. In particular, as mentioned above, while there is an allowance of 1,900 dwellings to meet unmet needs within the PfSH area, the table on page 367 of the Draft Local Plan confirms an additional supply of only 500 units within the SHUAs. A shortfall of 1400 units therefore exists, with no surety provided that the unmet needs can be delivered.
21. The South Hampshire Urban Area can make a substantial contribution to housing needs, including the unmet needs of the PfSH through consideration of the Area of Search East of Botley identified in Policy SPS8 of the PfSH Spatial Position Statement. In this context, our client has an interest in SHELAA site ref CU08 which represents a demonstrably sustainable location that is well located to deliver up to 177 high quality homes.

Q9: Would the Plan period accord with NPPF paragraph 22, which requires strategic policies should look ahead over a minimum 15-year period from adoption?

22. The Council has not allowed for any buffer should the examination period be extended and adoption therefore post-2025. Adoption of the plan post-2025 will mean the policies do not look forward to a minimum of 15 years, as required by Paragraph 22.

The overall supply of housing

Q1: 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 periods, in accordance with NPPF paragraph 69?

23. The trajectory does not identify sufficient growth within the PfSH area. The PfSH area must be defined and identified as a broad location for growth, and the trajectory should include a sufficient supply of sites to meet the unmet needs allowance in full within this location.

Q3: 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?

24. A windfall allowance just based on past trends is flawed. There is an exhausting availability of land within settlements, therefore it cannot be assumed that past trends can continue. Past trends must be viewed in conjunction with future availability. No evidence of future availability of windfall sites, such as potential conversions, commercial sites or infill opportunities is provided. The very high reliance on windfall supply is not consistent with the Framework.
25. In addition, we note that the published trajectory within the Housing Topic Paper Update includes a windfall allowance from the year 2026/27 and beyond. This overlaps with the forecast completions of 'small sites with planning permission' which are identified to account for 61 dwellings for each of the first 5 years of the plan period. This conflicts with paragraph 6.1.6 of the Windfall Assessment Report 2021 (document ref: HA07) which states *'It is not normal to apply the windfall estimate to the early years of the Plan period, as dwellings completed in this period will already have consent and so are counted as 'commitments'.* It is considered that there has been an element of double counting within the trajectory and this should be rectified.

Q5: 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?

26. The phasing restrictions are inconsistent with the Framework and the Written Ministerial Statement of July 2024.
27. Paragraph 6.6 onwards of Housing Topic Paper Update January 2025 (document ref: ED02). rightly considers the implications of the latest Framework. While the Local Plan is examined under the December 2023 Framework, the transitional provisions under paragraph 236 of the December 2024 are engaged (by reference to 234(b)).
28. The proposed housing requirement for the emerging Local Plan of 15,465 dwellings (773dpa) would meet 67% of local housing needs of 1157dpa (calculated using the standard method published 12 December 2024). The consequence is that *"the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need."*
29. In adopting this Local Plan, there would be a demonstrable shortfall for plan-making purposes under paragraph 234(b). There are also implications for decision

making as set out in paragraph 78(c). A 20% buffer would be required from 1 July 2026.

30. The data at Appendix B of the Housing Topic Paper does not relate to decision-taking as set out in Table 6, which is important to assess the realities of the December 2024 Framework. Instead, Appendix B supports Table 5. The graph at Appendix C is unsupported by the underpinning assumptions on '*without phasing*' and which sites are affected and when these are envisaged to be delivered.
31. Paragraph 6.10 accepts higher housing requirements are inevitable; however, it does not go on to consider how any earlier permitting of the phased H2 sites would ultimately count towards meeting those increased requirements.
32. Consequently, there is no sound reason to delay any planning application being made, and homes being delivered, through the phasing restrictions defined in Policy H2

Q6: 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)?

33. The sites restricted by phasing, including Policy CC2, are deliverable earlier than to be restricted by the Council. There is no objection to a stepped trajectory which boosts the supply of housing in the early years of the Local Plan on the basis that this is inclusive of allowing delivery at the Policy CC2 allocation.
34. Ultimately, the PfSH Area of Search at Botley provides an appropriate location to further widen the supply of land for housing to meet wider needs throughout the Plan period. An allowance for growth in this area to meet needs in the plan period and beyond can assist the Council in maintaining supply over a longer timescale. However, this is reliant on the Local Plan being modified through Strategic Policies that define the Area of Search East of Botley, and / or then determine the appropriate sites to allocate.