

## **EXAMINATION OF THE WINCHESTER DISTRICT LOCAL PLAN**

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### **EXAMINATION STATEMENT ON BEHALF OF CROUDACE HOMES LIMITED**

#### ***Matter 4 – Meeting Housing Need***

*Prepared by:*  
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April 2025

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*Matter 4 – Meeting Housing Need*

*03 April 2025*

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### 1. Introduction

- 1.1 This Examination Statement provides a response on behalf of Croudace Homes Limited ("Croudace"), to those Questions raised by the Inspector (dated 24 February 2025), relating to the Stage 1 Hearings of the Winchester District Local Plan 2020-20240 (the Plan) and its supporting evidence base.
- 1.2 This Statement has been prepared by Neame Sutton on behalf of Croudace and specifically looks at the questions and issues raised by the Inspector in relation to Matter 4 – Meeting Housing Need.

### 2 Matter 4 – Meeting Housing Need

#### Housing Requirement:

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

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

- 2.1 In short, Croudace considers that the Council has taken the right approach in terms of the starting point for the calculation of its Housing Requirement. The minimum LHN has been correctly calculated via the Standard Method in accordance with the Framework 2023 and corresponding version of the PPG.
- 2.2 This has generated a LHN figure of 676 dpa, which is the right starting point for the Plan.

- 2.3 As we have set out in our Representations the LHN forms the minimum starting point but the PPG does identify circumstances where the LHN should be set higher than that calculated via the Standard Method. Examples of these circumstances include meeting unmet need arising from a neighbouring authority or addressing a particular affordability issue<sup>1</sup>.
- 2.4 The matter of unmet need is covered in our Matter 1 Statement. In short, there is clear evidence that an allowance for unmet need should be included as part of the calculation of the Housing Requirement<sup>2</sup>.
- 2.5 The level of unmet need in the area surrounding the District, which the Council has not properly considered through the DtC, nor has it properly taken into account within its calculation of the Housing Requirement, is one factor.
- 2.6 The second factor relates to the worsening affordability in the District. This is evidenced by the increased affordable housing need both in terms of affordable/social rent and intermediate accommodation. It is relevant to note that as of March 2024 there were 591 no. households in Winchester living in temporary accommodation. Within these households, there are a total of 61 no. children. The Council's own waiting list amounts to 1,579 households, which is huge<sup>3</sup>. Equally the Labour Government's new Standard Method calculation of LHN that is adjusted to more accurately address this issue, also confirms through its substantial uplift to the LHN that there is a worsening affordability in the District.
- 2.7 Finally, there is the presence of the new Framework 2024 and accompanying updated Standard Method along with the transitional provisions that will be triggered by this Plan i.e. the need for the Council to undertake an immediate and full review of this Plan upon adoption to address the new LHN along with the imposition of a 20% buffer from July 2026<sup>4</sup>. This is something that the Council freely accepts will be the case<sup>5</sup>.
- 2.8 All of these factors point strongly towards an increase to the Housing Requirement beyond the LHN as a starting point.

<sup>1</sup> Paragraph: 010 reference ID: 2a-010-20201216 – Housing and Economic Needs section of PPG

<sup>2</sup> See Table 1 on Page 5 of Matter 1 Statement

<sup>3</sup> [www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness](https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness)

<sup>4</sup> See Paragraph 236 on Page 68 of the Framework 2024

<sup>5</sup> See Page 1 of ED07 and also the Matter 3 Statement prepared by Southern Planning Practice on behalf of Croudace

**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 SDNP part of Winchester District. Would that approach accord with NPPF Paragraph 61?*
2. *SDNP suggest a figure of 250 dwellings would be delivered within 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?*
- 2.9 In short no. The Council has not reached any formal agreement with the SDNP through a SoCG that the SDNP will deliver the 350 dwellings. In fact the SDNP position is clearly laid out that it can only deliver 250 dwellings within the Plan period.
- 2.10 That being the case the most that the Council should rely upon for this Plan is 250 dwellings coming forward within the Plan period. The remaining 100 dwellings should be positively planned for elsewhere in the District as part of this Plan.
- 2.11 The consequence of the Council's current approach is that the Plan is actively set up to fail those residents in the SDNP over the Plan period by delivering 100 dwellings fewer than are required. That is not sound planning.
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?*
4. *In accordance with the approach set out in the 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?*
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)?*
- 2.12 As we have identified in our Regulation 19 Representations, the figure of 1,900 dwellings bears no resemblance to the actual unmet need arising from neighbouring authorities. As an example Portsmouth alone has an unmet need of at least 3,577 dwellings.
- 2.13 The Council has attempted to justify its position in the Housing Topic Paper Update (ED02) but despite a lengthy discussion on the matter, the ultimate explanation for the figure is set out at Paragraph 4.26 on Page 20, which states that Winchester has 'offered 1,900 'DtC' homes to adjoining authorities'.

- 2.14 In short the Council has applied an arbitrary figure without regard to the evidence of unmet needs, nor indeed the updated position from those neighbouring authorities as a result of the new Framework 2024<sup>6</sup>.
- 2.15 In Croudace's view the figure of 1,900 dwellings must be regarded as a minimum position and it is certainly not one that is reflected of the total unmet need arising from neighbouring authorities. In answer to the specific question raised by the Inspector (Question 3 above), the evidence does clearly demonstrate that a Housing Requirement above the LHN is justified. However, the current housing figure chosen by the Council, is in Croudace's view, too low and not reflective of the evidence of unmet need arising from neighbouring authorities.
- 2.16 In any event, the figure included as part of the Housing Requirement should be expressed as a specific number to enable clarity when considering the effectiveness of the Plan's proposed housing supply and to allow for ease of monitoring.
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, and if so, would that be effective?*
- 2.17 Yes, there is substantive evidence to demonstrate that an adjustment should be made to the minimum Housing Requirement. Both the Housing Topic Paper (July 2024) and the SHMA updated 2024 confirm that (as at 2024) the affordable/social rented housing need has increased by 25 dpa since 2020 to 368 dpa and the affordable home ownership has also increased by 19 dpa to 142 dpa<sup>7</sup>.
- 2.18 The increased level of need is symptomatic of the lack of affordability in the District, which is currently at 13.19 compared with the national average of 8.26<sup>8</sup>. This is high and, has the consequence of excluding more people from the open market and pushing them on the housing needs register.
- 2.19 Given that the vast majority of affordable homes are delivered via S106 Agreements as part of open market housing schemes, the most effective mechanism for delivering more affordable homes is to increase the minimum Housing Requirement.

<sup>6</sup> Our Matter 1 Statement refers at Table 1 on Page 5

<sup>7</sup> Paragraph 3.20 of the Housing Topic Paper July 2024 and the SHMA Update 2024

<sup>8</sup> ONS – Median workplace-based affordability ratios for 2023 published on 25 March 2024 -

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

2.20 Taking the above matters into account Croudace, considers that the minimum Housing Requirement should be increased beyond the figure currently proposed by the Council. Given the immediate need for a full review of the Plan as required by the transitional provisions set out in the Framework 2024, it would be logical for the Council to make additional provision now and to plan positively to meet not only its own needs but those of its neighbours.

2.21 It is for these reasons that Croudace maintains its view that the minimum Housing Requirement should be as set out in the table below:

Table 1: Croudace's Minimum Housing Requirement Calculation

	Dwellings	dpa
Minimum LHN	13,520	676
Minimum Unmet Need Uplift	1,900	95
Sub-Total	15,420	771
Uplift to reflect affordability, accommodation of more of the identified unmet need and to bring the Plan within 200 dpa of the new Standard Method LHN	2,560 <sup>9</sup>	128
<b>Total Minimum Housing Requirement</b>	<b>17,980</b>	<b>899</b>

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?*

2.22 Croudace doesn't have any additional comments to add on this point.

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)?*

2.23 In short no. The Plan is not ambitious in its outlook and the Council has not taken the opportunity presented by the preparation of a new Plan to significantly boost the supply of housing as required by Paragraph 60 of the Framework 2023. The consequence of the Council's lack of ambition is reflected by the fact that an immediate full Plan review will be required to address the new LHN arising from the Standard Method introduced on 12 December 2024. That will effectively render the current Plan obsolete almost as soon as it is adopted.

<sup>9</sup> See our Regulation 19 Representations

2.24 As set out in relation to questions 1-6 above, the Council has an opportunity to deliver more homes now to address the need now and, to avoid the need for immediate review, but it has failed to do so. The consequence of not doing this will be yet further delay for those members of the community that desperately need a home of their own (currently in excess of 1,500 households on the Council's register<sup>10</sup>). That does not amount to positive planning nor is the approach being taken consistent with the clear and long standing national policy objective to significantly boost the supply of new homes now.

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?*

2.25 Whether Paragraph 22 is complied with or not will very much depend on the date that the Plan is adopted.

2.26 Given the current position with the Examination and taking account of the need for a Main Modifications Consultation (which the Council itself has already foreshadowed by submitting the Plan with suggested modifications) adoption is unlikely to be before the end of 2025. That would leave only 14 years until the end of the Plan period in 2040. As a consequence the Plan would not meet the requirements of paragraph 22 and the Plan period should be extended.

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?*

2.27 The Council attempts in its Housing Topic Paper Update (ED02) to justify its approach on the retention of the 2020 start date by reference to Hart District Council, albeit that the Council does acknowledge that the Hart Plan example related to the previous approach to calculating Objective Assessed Needs ("OAN") and not LHN calculated via the Standard Method.

2.28 The problem with the Council's approach and its justification is that it relates to the OAN approach, which did cater for an earlier start date and in turn past under/over supply. The Standard Method calculation of LHN already caters for past under/over supply within the affordability uplift and, in accordance with the PPG, is to be updated annually until the Plan is submitted for Examination. This is because the

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<sup>10</sup> Figure from Council's latest Housing Strategy Report – July 2024

Standard Method is updated to take account of changes in completions and affordability.

- 2.29 The Council's approach is therefore incorrect and the Plan period should commence from the date of submission of the Plan, which is 2024. It is clear why the Council has taken the approach it has when its housing trajectory is examined. The trajectories attached at **Appendix 1** of this Statement show the level of impact. Trajectory 1 reflects the Council's proposed approach and shows a healthy rolling 5-year housing land supply. Trajectory 3 shows the position when the correct start date for the Plan period is applied, which results in a significant shortfall in housing delivery across the District and a rolling 5-year housing land supply shortfall.
- 2.30 As a further illustration of the point the Standard Method calculation of LHN has, since 2020 been steadily reducing (under the relevant calculation tied to the Framework 2023):

Table 2: Standard Method calculation of LHN<sup>11</sup>

Year	LHN
2020	666
2021	715
2022	710
2023	692
2024	676

- 2.31 The reason for the gradual reduction in the LHN is a reflection of the over provision that has taken place. The Council cannot therefore seek to include the over provision again within its supply because to do so would be a double count.

*11. Neighbourhood Plans are in preparation for New Alresford and Hursley. Denmead has a Neighbourhood Plan which the Parish Council intends to review. Can the Council provide an update in this regard?*

- 2.32 Croudace does not have any comments to make on this question.

*12. NPPF paragraph 67 expects strategic policies to set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Would the Plan accord with this expectation?*

- 2.33 Croudace does not have any comments to make on this question.

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<sup>11</sup> Calculated by reference to the relevant Standard Method and inputs to the calculation prevailing at the time.



*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?*

2.34 It will be necessary to update the housing trajectory for the Plan as a result of the Examination process. However, the time to make those updates will be as part of the Main Modifications consultation and once all of the Hearing sessions have concluded.

2.35 In terms of changes to the requirement, the Council's proposed change appears to be on the basis that it says its supply has reduced. That cannot be the right approach. If supply has reduced then the Council needs to rectify the shortfall rather than seeking to reduce the requirement. In any event and, for the reasons set out earlier in this Statement, the requirement should be increased and in turn further site allocations will be required.

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

2.36 There are a number of factors to consider in answering this point:

- a) Whether it is appropriate for the Council to have included past over-supply between 2020-2024;
- b) The evidence (or lack thereof) to demonstrate that the Category b) sites relied upon by the Council in years 1-5 following the projected adoption of the Plan are deliverable;
- c) The compelling evidence (or lack thereof) to demonstrate that the windfall allowance included in the trajectory is appropriate; and,
- d) Whether the housing requirement proposed in the Plan is correct or not.

- 2.37 Croudace's views in respect of points a) and d) are set out under the housing requirement section of this Statement above. In short the Council should not be including past over-supply and the housing requirement set is too low.
- 2.38 Turning to the supply matters (points b) and c)), the Council is seeking to rely on its Housing Topic Paper Update (ED02). That document is extremely light on detail particularly in relation to the clear evidence of delivery required by the Annex 2 text in the Framework 2023 for sites falling within Category b), namely:
- Local Plan 2040 Allocations (without planning permission)
  - Other Existing Allocations (without planning permission)
  - Existing Local Plan Strategic Allocations (insofar as they do not have a detailed permission, which is not clear from the evidence provided thus far by the Council)
- 2.39 In relation to the first two supply sources the evidence contained in ED02 goes nowhere near to meeting the Annex 2 test for deliverability and therefore the Council should not be seeking to rely upon delivery from these sources in years 1-5 after the proposed adoption date of the Plan.
- 2.40 On strategic allocations from the existing Plan the information provided is unclear and as a consequence it is not possible to define how much of each site benefits from full detailed planning permission (category a)) and how much falls within category b). It is noted that the Inspector has asked for detailed site delivery information from the Council in the MIQs. In this regard we reserve the right to update our evidence on this matter once the Council has produced the necessary information.
- 2.41 The impacts of the removal of the above supply sources from the first 5 years of the Plan following proposed adoption along with the removal of the past over-supply to eliminate double counting is set out Trajectory 3 attached at **Appendix 1** of this Statement. When these adjustments are made it is clear that the Plan is unsound in that it fails to make sufficient provision for even the minimum housing requirement set out by the Council resulting in a shortfall of **-1,642 dwellings** at the end of the Plan period. It is also relevant to note that at no point during the Plan period will the Council be able to demonstrate a 5-year housing land supply.
- 2.42 The position is materially worse when the housing requirement is adjusted<sup>12</sup>. Even including the past double counting on over-supply the Plan would fall short by **-3,399 dwellings** over the Plan period (Trajectory 4 in **Appendix 1**).

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<sup>12</sup> See Table 1 above.

2.43 In conclusion on this point the trajectory is not realistic and is unsound.

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?*

2.44 The Housing Topic Paper Update confirms that the Council is seeking to rely upon its Assessment of Windfall Trends and Potential report published in February 2021. Paragraph 1.1 of that report confirms that it has analysed past completions between April 2012 – March 2019. There is no consideration of future trends or circumstances.

2.45 Paragraph 72 of the Framework 2023 requires compelling evidence to be provide that windfalls provide a reliable source of supply:

*'Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates **and expected future trends.**'*  
(Bold is our emphasis)

2.46 Firstly, the Council's assessment is now 4 years old and therefore is not reflective of current policy and the current economic conditions. Secondly, the assessment looks at a period where, primarily, the first iteration of the Framework 2012 was in place and also the world had not been impacted by the COVID-19 pandemic and subsequent economic downturn.

2.47 Thirdly, no consideration has been given to future trends or circumstances such as:

- The planning system is experiencing a period of extreme change and uncertainty given the recent change in government. Speculative applications on unidentified sites at a time when the planning system is experiencing change may well be viewed by some small to medium sized developers as too high risk;
- The economic climate in the UK has entered a period of uncertainty, with interest rates reaching the highest levels in almost 15 years recently;
- In November 2022 UK inflation hit 10.7%. Whilst the latest figure for March 2025 is 3.0% showing a marked improvement this is still substantially above the position in 2021 (when the Council's report was written), which was less than 1%;
- As a consequence of the substantial increase in inflation the Bank of England had increased the base rate to its highest level for 15 years 5.25%. This is now at 4.5%. This compares with a rate of 0.1% in 2021;

- The significant increase in the base rate has of course led to a historic high in borrowing costs with mortgages and other forms of debt increasing exponentially;
- The current uncertainty is highly likely to lead to a slow-down in the market and housing delivery, which will affect the small to medium sized builders first. In fact the latest statistical release from Homes England (05 December 2024) confirms that overall housing starts are down by 3.8% when compared with the same period for the previous year<sup>13</sup>;
- Whilst there has been a marked improvement in the inflation position interest rates on loans have not improved and the period of uncertainty is unlikely to change in the short term due to the impending changes to the planning system; and,
- It is acknowledged that the new Framework 2024 has boosted confidence and will, in time, lead to increased delivery, this Plan is being prepared against the more restrictive backdrop of the Framework 2023.

2.48 None of the above factors have been considered by the Council because, put simply, the Council has not presented any real evidence of future trends in windfall delivery across the District. It cannot therefore be said that the data set out at is a reliable basis for predictions of windfall delivery going forward.

*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?*

2.49 In broad terms the answer to this is no, for the reasons set out in the paragraphs above.

*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?*

2.50 The approach set out in Policy H2 cannot be a sound or positively planned approach for the following reasons:

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<sup>13</sup> Table 1a on Page 8 of Housing Statistics – 01 April 2023 – 31 March 2024 (published 05 December 2024) - [https://assets.publishing.service.gov.uk/media/675034abb9847955e1632a33/Housing\\_Statistics\\_December\\_2024.pdf](https://assets.publishing.service.gov.uk/media/675034abb9847955e1632a33/Housing_Statistics_December_2024.pdf)

- a) The Council accepts that the housing requirement it is planning for represents an uplift from the old Local Plan to reflect the increased need for both market and affordable accommodation. That need should not be artificially delayed;
- b) The Council is proposing greenfield allocations in this Plan as sound allocations that meet the necessary tests. Therefore there is no reason to delay their delivery if market conditions dictate they are required now;
- c) This Plan is only going to have a short shelf life if it is found sound and legally compliant. That is because the transitional provisions set out in the Framework 2024 will require the Council to commence work on a new full review of the Plan immediately to accommodate the significant shortfall against the current Standard Method calculation of LHN; and,
- d) It is clear therefore that there is a substantial need for new homes in the District now and the Council will have to make further substantial greenfield allocations immediately. To artificially delay delivery of new homes in this context is not sound planning and flies in the face of the Government's firm objective to significantly boost the supply of housing now.

*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)?*

- 2.51 In short, no. The Council's approach is not effective, justified or consistent with national policy in the current context that requires an immediate and full Plan review, which the Council freely accepts is the case.

**Five Year Housing Land Supply:**

- 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. 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?*

- 2.52 As set out in the section above and illustrated in the trajectories attached at **Appendix 1** the Plan will only provide for a 5-year housing supply if the Council's approach to past over-supply coupled with its reliance on Category b) sites without delivery evidence is accepted. In the circumstances where the correct approach is applied the Council will not be able to demonstrate a 5-year housing supply at any point during the Plan period.

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?*

2.53 This matter has been dealt with above.

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?*

2.54 The Council has absolutely no basis whatsoever to apply the Liverpool Method. The Framework 2023 and corresponding PPG is clear that the Sedgefield Method is to be applied to the calculation of 5-year housing land supply. In fact ED07 offers no explanation at all as to why the Liverpool Method is proposed to be used by the Council.

2.55 On the Council's own evidence it suggests there is a healthy rolling 5-year housing land supply<sup>14</sup>. Consequently, on the Council's case there is no need to apply the Liverpool Method.

2.56 The simple point here is that the Sedgefield Method should be applied to the calculation in order to comply with paragraphs 69 and 77.

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<sup>14</sup> Appendix B on Pages 40-41 of ED07

# Appendix 1:

## Housing Trajectory and Supply Analysis:

- Trajectory 1 – Council Position applying Sedgefield and 5% Buffer
- Trajectory 2 – Council Position applying Neame Sutton adjustments to supply, Sedgefield and 5% Buffer
- Trajectory 3 – Neame Sutton Position on Supply and Plan period applying Sedgefield and 5% Buffer
- Trajectory 4 – Neame Sutton Position on Supply and Requirement applying Sedgefield and 5% Buffer



Housing Trajectory 1 - COUNCIL POSITION - Sedgefield 5%

As at: 14-Mar-25

Plan Period	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
Supply Sources	Pre-Adoption					Years 1-5					Years 6-10					Years 11-14					TOTAL
	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	
Completions	868	1193	1078	993																	4132
Small Sites (AMR App 3.3)					61	61	61	61	61												305
Large Sites with Full Planning Permissions					69	147	90	0	0	30											336
Existing Local Plan Allocations with Full Planning Permission					47	70	44	70	100	79	50	42									502
Existing Local Plan Strategic Allocations					545	565	535	535	485	460	410	341	215	190	149	90	53	40			4613
Large Sites with Outline Planning Permission (not allocated)																					0
Communal Planning Permissions (dwelling equivalents)						11	38	22													71
Local Plan 2040 Allocations (without planning permission)						10	34	100	207	198	230	505	590	495	350	315	260	150			3444
Other Existing Allocations (without planning permission)								8	10	10											28
Windfall Allowance							115	115	115	115	115	115	115	115	115	115	115	115	115	115	1610
TOTAL SUPPLY	868	1193	1078	993	722	864	917	911	978	892	805	1003	920	800	614	520	428	305	115	115	15041
Requirement	756	756	756	756	756	756	756	756	756	756	756	756	756	756	756	755	755	755	755	755	15115
Annual Shortfall/Surplus	112	437	322	237	-34	108	161	155	222	136	49	247	164	44	-142	-235	-327	-450	-640	-640	
Cumulative Shortfall/Surplus	112	549	871	1108	1074	1182	1343	1498	1720	1856	1905	2152	2316	2360	2218	1983	1656	1206	566	-74	
Base 5 Year Requirement	3780	3780	3780	3780	3780	3780	3780	3780	3780	3780	3780	3779	3778	3777	3776	3775					
Shortfall/oversupply (Sedgefield)	112.0	549.0	871.0	1108.0	1074.0	1182.0	1343.0	1498.0	1720.0	1856.0	1905.0	2152.0	2316.0	2360.0	2218.0	1983.0					
5 Year Requirement with Shortfall/oversupply	3668.0	3231.0	2909.0	2672.0	2706.0	2598.0	2437.0	2282.0	2060.0	1924.0	1875.0	1627.0	1462.0	1417.0	1558.0	1792.0					
Adjuste 5 Year Requirement with 5% Buffer	3851.4	3392.6	3054.5	2805.6	2841.3	2727.9	2558.9	2396.1	2163.0	2020.2	1968.8	1708.4	1535.1	1487.9	1635.9	1881.6					
Adjusted Annual Requirement (5yr)	770.3	678.5	610.9	561.1	568.3	545.6	511.8	479.2	432.6	404.0	393.8	341.7	307.0	297.6	327.2	376.3					
5 Year Supply	4854	4850	4574	4407	4392	4562	4503	4589	4598	4420	4142	3857	3282	2667	1982	1483					
Supply in Years	6.30	7.15	7.49	7.85	7.73	8.36	8.80	9.58	10.63	10.94	10.52	11.29	10.69	8.96	6.06	3.94					

Notes:

- 1 Annual Requirement from Reg 19 Local Plan Policy H1, which is 15,115 over the 20 year period and not the figure shown in the trajectory in the Housing Topic Paper
- 2 Supply taken from the Housing Topic Paper
- 3 Sedgefield Method of dealing with the shortfall/oversupply
- 4 5% Buffer in accordance with the 2023 HDT published on 12 December 2024





Housing Trajectory 2 - NEAME SUTTON POSITION ON SUPPLY - Sedgfield 5%

As at: 14-Mar-25

Plan Period	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
Supply Sources	Pre-Adoption					Years 1-5					Years 6-10					Years 11-14					TOTAL
	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	
Completions	868	1193	1078	993																	4132
Small Sites (AMR App 3.3)					61	61	61	61	61												305
Large Sites with Full Planning Permissions					69	147	90	0	0	30											336
Existing Local Plan Allocations with Full Planning Permission					47	70	44	70	100	79	50	42									502
Existing Local Plan Strategic Allocations					545	565	535	535	485	460	410	341	215	190	149	90	53	40			4613
Large Sites with Outline Planning Permission (not allocated)																					0
Communal Planning Permissions (dwelling equivalents)						11	38	22													71
Local Plan 2040 Allocations (without planning permission)						0	0	0	0	0	217	232	330	505	590	495	350	315	260	150	3444
Other Existing Allocations (without planning permission)								0	0	0	8	10	10								28
Windfall Allowance							0	0	0	0	115	115	115	115	115	115	115	115	115	115	1150
TOTAL SUPPLY	868	1193	1078	993	722	854	768	688	646	569	800	740	670	810	854	700	518	470	375	265	14581
Requirement	756	756	756	756	756	756	756	756	756	756	756	756	756	756	756	755	755	755	755	755	15115
Annual Shortfall/Surplus	112	437	322	237	-34	98	12	-68	-110	-187	44	-16	-86	54	98	-55	-237	-285	-380	-490	
Cumulative Shortfall/Surplus	112	549	871	1108	1074	1172	1184	1116	1006	819	863	847	761	815	913	858	621	336	-44	-534	
Base 5 Year Requirement	3780	3780	3780	3780	3780	3780	3780	3780	3780	3780	3780	3779	3778	3777	3776	3775					
Shortfall/oversupply (Sedgfield)	112.0	549.0	871.0	1108.0	1074.0	1172.0	1184.0	1116.0	1006.0	819.0	863.0	847.0	761.0	815.0	913.0	858.0					
5 Year Requirement with Shortfall/oversupply	3668.0	3231.0	2909.0	2672.0	2706.0	2608.0	2596.0	2664.0	2774.0	2961.0	2917.0	2932.0	3017.0	2962.0	2863.0	2917.0					
Adjuste 5 Year Requirement with 5% Buffer	3851.4	3392.6	3054.5	2805.6	2841.3	2738.4	2725.8	2797.2	2912.7	3109.1	3062.9	3078.6	3167.9	3110.1	3006.2	3062.9					
Adjusted Annual Requirement (5yr)	770.3	678.5	610.9	561.1	568.3	547.7	545.2	559.4	582.5	621.8	612.6	615.7	633.6	622.0	601.2	612.6					
5 Year Supply	4854	4840	4415	4025	3678	3525	3471	3443	3425	3589	3874	3774	3552	3352	2917	2328					
Supply in Years	6.30	7.13	7.23	7.17	6.47	6.44	6.37	6.15	5.88	5.77	6.32	6.13	5.61	5.39	4.85	3.80					

Notes:

- 1 Annual Requirement from Reg 19 Local Plan Policy H1, which is 15,115 over the 20 year period and not the figure shown in the trajectory in the Housing Topic Paper
- 2 Supply taken from the Housing Topic Paper
- 3 Sedgfield Method of dealing with the shortfall/oversupply
- 4 5% Buffer in accordance with the 2023 HDT published on 12 December 2024
- 5 Adjustments made to Cat B sites to remove from current 5 year period as no evidence presented by Council that they are Annex 2 compliant
- 6 Adjustments made to windfalls in current 5-year period as no evidence that they have a) not double counted with small site consents category and b) compelling evidence for inclusion in the 5-year period



Housing Trajectory 3 - NEAME SUTTON POSITION ON SUPPLY & PLAN PERIOD - Sedgefield 5%

As at: 14-Mar-25

Plan Period					1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Supply Sources	Pre-Adoption					Years 1-5					Years 6-10					Years 11-14					
	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	TOTAL
Completions																					0
Small Sites (AMR App 3.3)					61	61	61	61	61												305
Large Sites with Full Planning Permissions					69	147	90	0	0	30											336
Existing Local Plan Allocations with Full Planning Permission					47	70	44	70	100	79	50	42									502
Existing Local Plan Strategic Allocations					545	565	535	535	485	460	410	341	215	190	149	90	53	40			4613
Large Sites with Outline Planning Permission (not allocated)																					0
Communal Planning Permissions (dwelling equivalents)						11	38	22													71
Local Plan 2040 Allocations (without planning permission)						0	0	0	0	0	217	232	330	505	590	495	350	315	260	150	3444
Other Existing Allocations (without planning permission)								0	0	0	8	10	10								28
Windfall Allowance							0	0	0	0	115	115	115	115	115	115	115	115	115	115	1150
TOTAL SUPPLY	0	0	0	0	722	854	768	688	646	569	800	740	670	810	854	700	518	470	375	265	10449
Requirement					756	756	756	756	756	756	756	756	756	756	756	755	755	755	755	755	12091
Annual Shortfall/Surplus					-34	98	12	-68	-110	-187	44	-16	-86	54	98	-55	-237	-285	-380	-490	
Cumulative Shortfall/Surplus					-34	64	76	8	-102	-289	-245	-261	-347	-293	-195	-250	-487	-772	-1152	-1642	
Base 5 Year Requirement					3780	3780	3780	3780	3780	3780	3780	3779	3778	3777	3776	3775					
Shortfall/oversupply (Sedgefield)					-34.0	64.0	76.0	8.0	-102.0	-289.0	-245.0	-261.0	-347.0	-293.0	-195.0	-250.0					
5 Year Requirement with Shortfall/oversupply					3814.0	3716.0	3704.0	3772.0	3882.0	4069.0	4025.0	4040.0	4125.0	4070.0	3971.0	4025.0					
Adjuste 5 Year Requirement with 5% Buffer					4004.7	3901.8	3889.2	3960.6	4076.1	4272.5	4226.3	4242.0	4331.3	4273.5	4169.6	4226.3					
Adjusted Annual Requirement (5yr)					800.9	780.4	777.8	792.1	815.2	854.5	845.3	848.4	866.3	854.7	833.9	845.3					
5 Year Supply					3678	3525	3471	3443	3425	3589	3874	3774	3552	3352	2917	2328					
Supply in Years					4.59	4.52	4.46	4.35	4.20	4.20	4.58	4.45	4.10	3.92	3.50	2.75					

Notes:

- 1 Annual Requirement from Reg 19 Local Plan Policy H1, which is 15,115 over the 20 year period and not the figure shown in the trajectory in the Housing Topic Paper
- 2 Supply taken from the Housing Topic Paper
- 3 Sedgfield Method of dealing with the shortfall/oversupply
- 4 5% Buffer in accordance with the 2023 HDT published on 12 December 2024
- 5 Adjustments made to Cat B sites to remove from current 5 year period as no evidence presented by Council that they are Annex 2 compliant
- 6 Adjustments made to windfalls in current 5-year period as no evidence that they have a) not double counted with small site consents category and b) compelling evidence for inclusion in the 5-year period
- 7 Adjustment made to commence plan period from point of submission of Plan for examination in 2024



Housing Trajectory 4 - NEAME SUTTON POSITION ON SUPPLY& REQUIREMENT - Sedgefield 5%

As at: 14-Mar-25

Plan Period	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
Supply Sources	Pre-Adoption					Years 1-5					Years 6-10					Years 11-14					TOTAL
	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	
Completions	868	1193	1078	993																	4132
Small Sites (AMR App 3.3)					61	61	61	61	61												305
Large Sites with Full Planning Permissions					69	147	90	0	0	30											336
Existing Local Plan Allocations with Full Planning Permission					47	70	44	70	100	79	50	42									502
Existing Local Plan Strategic Allocations					545	565	535	535	485	460	410	341	215	190	149	90	53	40			4613
Large Sites with Outline Planning Permission (not allocated)																					0
Communal Planning Permissions (dwelling equivalents)						11	38	22													71
Local Plan 2040 Allocations (without planning permission)						0	0	0	0	0	217	232	330	505	590	495	350	315	260	150	3444
Other Existing Allocations (without planning permission)								0	0	0	8	10	10								28
Windfall Allowance							0	0	0	0	115	115	115	115	115	115	115	115	115	115	1150
TOTAL SUPPLY	868	1193	1078	993	722	854	768	688	646	569	800	740	670	810	854	700	518	470	375	265	14581
Requirement	899	899	899	899	899	899	899	899	899	899	899	899	899	899	899	899	899	899	899	899	17980
Annual Shortfall/Surplus	-31	294	179	94	-177	-45	-131	-211	-253	-330	-99	-159	-229	-89	-45	-199	-381	-429	-524	-634	
Cumulative Shortfall/Surplus	-31	263	442	536	359	314	183	-28	-281	-611	-710	-869	-1098	-1187	-1232	-1431	-1812	-2241	-2765	-3399	
Base 5 Year Requirement	4495	4495	4495	4495	4495	4495	4495	4495	4495	4495	4495	4495	4495	4495	4495	4495					
Shortfall/oversupply (Sedgefield)	-31.0	263.0	442.0	536.0	359.0	314.0	183.0	-28.0	-281.0	-611.0	-710.0	-869.0	-1098.0	-1187.0	-1232.0	-1431.0					
5 Year Requirement with Shortfall/oversupply	4526.0	4232.0	4053.0	3959.0	4136.0	4181.0	4312.0	4523.0	4776.0	5106.0	5205.0	5364.0	5593.0	5682.0	5727.0	5926.0					
Adjuste 5 Year Requirement with 5% Buffer	4752.3	4443.6	4255.7	4157.0	4342.8	4390.1	4527.6	4749.2	5014.8	5361.3	5465.3	5632.2	5872.7	5966.1	6013.4	6222.3					
Adjusted Annual Requirement (5yr)	950.5	888.7	851.1	831.4	868.6	878.0	905.5	949.8	1003.0	1072.3	1093.1	1126.4	1174.5	1193.2	1202.7	1244.5					
5 Year Supply	4854	4840	4415	4025	3678	3525	3471	3443	3425	3589	3874	3774	3552	3352	2917	2328					
Supply in Years	5.11	5.45	5.19	4.84	4.23	4.01	3.83	3.62	3.41	3.35	3.54	3.35	3.02	2.81	2.43	1.87					

Notes:

- 1 Annual Requirement from Reg 19 Local Plan Policy H1, which is 15,115 over the 20 year period and not the figure shown in the trajectory in the Housing Topic Paper
- 2 Supply taken from the Housing Topic Paper
- 3 Sedgfield Method of dealing with the shortfall/oversupply
- 4 5% Buffer in accordance with the 2023 HDT published on 12 December 2024
- 5 Adjustments made to Cat B sites to remove from current 5 year period as no evidence presented by Council that they are Annex 2 compliant
- 6 Adjustments made to windfalls in current 5-year period as no evidence that they have a) not double counted with small site consents category and b) compelling evidence for inclusion in the 5-year period
- 7 Adjustments made to requirement to reflect Neame Sutton Evidence