



Winchester Local Plan Examination

Hearing Statement

Matter 10: Homes for all (policies H5-H11)

On behalf of **Obsidian Asset Management Limited**

Project Ref: 33312857500 | Rev: AA | Date: April 2025

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1 Winchester Local Plan Examination

1.1 Matter 10: Homes For All (Policies H5-H11)

- 1.1 This hearing statement responds to ***Matter 10: Would the housing policies H5-H11 be clear, justified and consistent with national policy and would they be effective?*** In doing so we refer specifically to Policy H5 (Meeting housing needs) and ***Question 3: Would policy H5 requirements for specialist homes be justified by the evidence? Would policy requirements provide appropriate flexibility?***
- 1.2 The National Planning Policy Framework (NPPF) sets out the requirement for plan-makers to meet an identified need for housing for older people, including consideration of the type of accommodation likely to be required. Paragraph 62 of the NPPF requires strategic policies to be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.
- 1.3 The new NPPF (December 2024), which has been published since the previous Regulation 19 consultation in October 2024, includes at Paragraph 60, a new statement advising the overall aim for local planning authorities “should be to meet as much of an area’s identified housing need as possible” including accommodation for older people. Paragraph 63 of the updated NPPF also sets out different types of housing for older people – namely “retirement housing, housing-with-care and care homes” and requires that, in the context of establishing need, the size, type and tenure of housing needed for older people is assessed and reflected in planning policies.
- 1.4 This strengthening of the National Policy requirement to directly address later living needs underpins the need to identify a greater number of later living allocations within the Local Plan to effectively deliver a greater volume of this type of development to meet increasing needs.
- 1.5 In tandem with the strengthened National Policy requirement to meet specialist housing needs, the NPPF updates have resulted in a significant increase in the overall housing requirements for Winchester. In progressing to examination, WCC have responded to the Inspector to advise that the city council fully recognises that the housing requirement in the Local Plan is less than 80% of local housing need as calculated using the new standard methodology. Based on the Housing Topic Paper it is 752pa or 67% of the Standard Method (which is 1,127 homes per year).
- 1.6 Whilst it is acknowledged that the LPA have committed to undertaking an immediate review to address the shortfall in housing need, in accordance with the revised plan making system provided for under the Levelling Up and Regeneration Act, the need for development reconfirms

the importance of providing later living accommodation through this Local Plan. A commensurate increase in specialist housing provision must be accounted for within this increased requirement and the failure of the Plan to adequately provide for this is a significant missed opportunity to meet the clear need identified within Winchester's Strategic Housing Market Assessment 2020 (SHMA).

- 1.7 Accordingly, as per our previous representations to the Regulation 19 Stage of the Local Plan preparation (please refer to our regulation 19 representations, we consider that in the absence of any significant degree of allocation for specialist older persons housing, the current strategy is passive, relying on other sites providing ad hoc and uncoordinated provision, with no clear pipeline of development of specialist homes, notwithstanding the acute need identified in the SHMA.
- 1.8 We do not therefore consider that Policy H5 can be considered justified and consistent with national policy and further consider that it would be ineffective in meeting the acute need identified for specialist homes.
- 1.9 We consider that this should be rectified through refinement of Policy H5 (Meeting Housing Needs) to a) identify needs for specialist housing for older people; and b) subsequent allocation of sites to meet this need. This will ensure Policy H5 is effective and consistent with national policy.