

24 July 2025



#ANON-AQTS-3BQA-Z

Abigail Heath



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Dear Inspector,

WINCHESTER LOCAL PLAN – PLAN PERIOD

Following publication of the alternative plan-period housing trajectories ED25 and ED31(a)&(b) provided to you by the Council on 25.04.2025 and 02.06.2025 respectively Bloor welcomes your invitation for comments to be made on this matter.

In accordance with evidence provided to date, within our Matter.3 and Matter.4 Hearing Statements, verbally throughout the Examination and the co-signed HBF letter dated 28.04.2025, Bloor express that the plan-period should start in 2024/25 and as such utilise the latest calculation of local housing need.

The current approach taken by the Council fundamentally misunderstands the standard methodology which takes account of past supply through the affordability uplift to determine housing needs moving forward. This is clear from PPG para.2a-005 which notes that, when setting the baseline for the SM, the current year is used as the starting point for calculating growth. This approach was endorsed by Inspector Reed within para.6 of the North Norfolk Local Plan Examination post-examination hearing letter (dated 24.05.2024).

Inclusion of the years 2020-2023 translates into a heavy reliance on completions and outstanding planning permissions, evident by the fact that 64% of the future housing requirement has been achieved before the plan has been adopted. This alongside, the reliance on windfall development and carried forward allocations means only 2,875 dwellings, c.18% of the total housing need, is new planned development. This fundamentally goes against the Government commitment to boosting the supply of housing, and cannot be effective, justified or consistent with the NPPF.

As expressed throughout Bloor's Hearing Statements the provision of an unmet needs allowance of 1,900 dwellings (allocated: 30% or 570 dwellings for Portsmouth City and 70% or 1,330 dwellings for Havant Borough) (SD14a) in the context of a PfSH unmet need of c.42,000 dwellings is fundamentally inadequate. This allowance was not fixed as part of the housing requirement, it was simply what was left over from Regulation.18 in terms of supply. This was simply a piece of accountancy rather than proactive planning and indicates a failure of active co-operation in the preparation of the plan. The first consequence of an amended plan-period of 2024-2040 is an amplified failure of the DtC.

The effect of recalibrating the plan-period almost entirely removes the agreed unmet need contribution made by the 2040 plan to address the unmet needs of neighboring authorities (demonstrated in enclosed table.1). The almost complete diminution to a provision of just 93 dwellings (effectively: 28 dwellings for PC and 65 dwellings for HB), renders the respective SoCGs (SD08e/Havant and SD08i/Portsmouth) to address unmet needs arising within each authority area for plans prepared under the transitional provisions, invalid. This reduction in the provision of unmet needs essentially demonstrates that the Council were in effect using the surplus in the number of homes already in 2020 to 2024 to meet the future needs of Havant and Portsmouth. Bloor express that in accordance with section.33A of the 2004 Act, the DtC cannot be rectified during Examination.

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The second consequence of an amended plan period of 2024-2040 is an even greater failure against the 5YHLS Requirement. Bloor dispute the Councils comment in ED34a that the Council has a 6.6yr housing supply for the period of 2024-2040. As per our Matter 4 Hearing Statement, Bloor consider that the Council has undertaken the 5YHLS assessment incorrectly, as they have not taken into account the most up-to-date case law and have also assessed sites as being deliverable when they do not meet the definition of 'deliverable' in the NPPF. Bloor consider that the Council's calculation in ED34b for the period 2024-2040 should not be accepted as providing the correct 5YHLS calculation. Firstly, the Council has removed any requirement attributable to the provision of unmet needs within PfSH. As a minimum this should include the 1,900 dwellings the Council has previously put forward for delivery in the local plan. Secondly, Bloor do not consider the Council's assessment of the 5YHLS is fully justified as being deliverable. Bloor has commissioned its own assessment and estimates the supply should be 3,571 dwellings.

The following table shows the impact of adding an unmet need allowance of 1,900 dwellings on the deliverable five year supply as assessed by the Council and Bloor. In both cases the draft local Plan will not deliver a 5YHLS.

Housing Requirement 2024-2040		
a.	Local Plan housing requirement (excl.SDNP)	10,816
b.	Minimum unmet need for PfSH	1,900
c.	Plan Housing Requirement	12,716
d.	Completions Apr 2024-2025 (trajectory completions =722)	722
e.	Remaining Local Plan requirement (a-b)	11,994
f.	Remaining years of Plan (2025-2040)	15 years
g.	Annual Requirement (c/d)	800
h.	5% buffer 2025-2026 (e+5%)	840
i.	20% buffer 2026-2030 (e+20%x4yrs)	3,840
j.	5-year requirement 2025-2030 (f+g)	4,680
k.	Average annual requirement with buffer (i/5)	936
Housing Supply WCC		
l.	5-Year Supply (housing trajectory 2025-2030)	4,464
Resulting Land Availability		
m.	Years of land supply (l/k)	4.77
Housing Supply Bloor Homes		
n.	5-Year Supply 2025-2030	3,571
Resulting Land Availability		
o.	Years of land supply (l/k)	3.82

Based on the above, with an amended plan-period, the emerging Local Plan must be deemed to not be sound or legally compliant.

Yours sincerely

Abigail Heath
Senior Planner

cc. Jonathan Steele – Savills Planning Director
cc. Richard Henshaw – Intelligent Land Director

Table 1: Housing Trajectory of Winchester Local Plan – 2024 to 2040

	24/ 25	25/ 26	26/ 27	27/ 28	28/ 29	29/ 30	30/ 31	31/ 32	32/ 33	33/ 34	34/ 35	35/ 36	36/ 37	37/ 38	38/ 39	39/ 40
Requirement	676	676	676	676	676	676	676	676	676	676	676	676	676	676	676	676
Cumulative	676	1352	2028	2704	3380	4056	4732	5408	6084	6760	7436	8112	8788	9464	10140	10816
Delivery	722	854	897	831	928	954	835	1063	928	800	614	520	428	305	115	115
Cumulative	722	1576	2473	3304	4232	5186	6021	7084	8012	8812	9426	9946	10374	10679	10794	10909
Surplus/ Deficit	46	224	445	600	852	1130	1289	1676	1928	2052	1990	1834	1586	1215	654	93