

## Winchester LP ED25 & ED34

### Plan Period

With respect to the period 2020 – 2040, WCC acknowledged during the day 3 hearing session on housing land supply that the supply of homes across the period does not provide for an unmet need allowance of 1,900 homes, instead there is a 79 house reduction to 1,821 homes. Irrespective of any other adjustment, this reduction extends through each of the plan period scenarios, such that the unmet need allowance is reduced to 1,020 and 635 for the periods 2022 – 2040 and 2023 – 2040 respectively.

Further and in each case, WCC has over-estimated the contribution from the SDNPA. WCC has maintained the assumption that 350 homes will be delivered (equating to 17.5 dpa), despite the evidence given by the SDNPA about its own planning area. WCC then include a supply estimate of 333 and 319 homes in the trajectory commencing in 2022 and 2023 respectively. They also include 312 base-dated 2024, all based on a starting position of 350 dwellings less recorded completions (see ED34b). This would equate to 38 completed dwellings over a 4-year period, equivalent to an average of 9.5 dpa.

Two matters arise:

- a) The SM Need 2022 – 2040 is identified across 18 years (707+691+676) but  $18 \times 17.5$  is 315 homes, not 333. For the 17-year period 2023 – 2040  $17 \times 17.5$  is 298 not 319.
- b) Using the starting SDNPA figure of 250 (equivalent to 12.5 dpa and which aligns to delivery over the last 4-years) the contribution from SDNPA to the forward supply would be 233 (250-17) and 219 for the periods 2022-2040 and 2023-2040 respectively, then 210 base-dated 2024.

Including these adjustments to supply (in addition to the WCC 79 home reduction), the unmet need allowance is reduced further:

#### Submitted Local Plan period 2020-2040

- SM need 13,565 (Local Plan Table H1, p215)
- WCC Supply 15,291 (Matter 4 trajectory of 15,041 + 250 SDNP)
- Available for unmet need 1,726

#### Local Plan period 2022-2040

- SM need 12,214 (707 + 691 + 16 x 676, Local Plan Table H1)
- WCC Supply 13,213 (Matter 4 trajectory of 12,908 + 233)
- Available for unmet need 999

#### Local Plan period 2023-2040

- SM need 11,507 (1 x 691 + 16 x 676, Local Plan Table H1)
- WCC Supply 12,121 (Matter 4 trajectory of 11,902 + 219)
- Available for unmet need 614

WCC submitted the plan in November 2024, when the LN was 676 dpa. The impact of a plan-period 2024 – 2040 is not that as set out in ED34b, but instead would be:

- SM need 10,816 (16\*676)
- WCC Supply 11,121 (Matter 4 trajectory of 10,909 + 212 from SDNPA)
- Available for unmet need 305

The forward position, is clearly not remotely as positive as WCC portrayed in terms of any allowance to meet the unmet need when acknowledging its own supply and the stated (by the SDNPA) supply from NPA.

If extending the plan period by a year, to allow 15 years post-adoption, covering the 17 year period 2024 – 2041, would be:

- SM need 11,492 (17\*676)
- WCC Supply 11,236 (Matter 4 trajectory pf 10,909 + 1 year additional windfall allowance of 115 + 212 SDNPA)
- Shortfall -256
- Available for unmet need 0

The fact that WCC itself considers there to be fewer homes to address unmet need, as conceded during the hearing sessions, alone highlights that the provision has not been agreed with either Portsmouth or Havant. The above further underscores concerns that there is no specific provision for unmet need, there is no clarity in the approach to addressing unmet need which would otherwise confirm the effectiveness of the plan. This is because the allowance is a left-over which quickly diminishes when looking at the forward (plan-led) approach. Exacerbating the situation, all potential deficiencies in forward provision call on the unmet need 'allowance'. Hence, and similar to the Mid-Sussex situation, *"there must be a significant question mark as to how reliable any potential contribution would be in meeting unmet needs"* (Mid-Sussex Inspector Report)

Setting aside the DtC, the start date matters for soundness because a plan must be positively prepared, effective and consistent with national policy. Whilst there is no specific guidance, the PPG (which has the same status as the NPPF) is clear about the currency of the SM LHN rolled forward from a base-date (2 years) and the approach to housing land supply when using the SM LHN as the requirement (SM LHN resets the clock). By using the base date of 2020 to 'add in' "oversupply" is not positive or effective. This position is clearly exposed by the above calculations which confirm that WCC's forward planned supply from 2024 simply fails to meet the need.

WCCs approach fails to acknowledge on-site nutrient balance and/or mitigation, instead referencing only nutrient mitigation schemes currently available.

### Comments on Five-year HLS

We disagree with the calculations of five-year supply. As discussed during the hearing sessions, the five year position is a snap-shot in time and re-set each year when using the SM LHN as the requirement – which is the case in Winchester. The period 2020 – 2024 has no part to play in whether WCC can demonstrate a five-year HLS either on adoption of the plan

or for decision making. The only supply relevant is that base-dated 1 April 2025, and it should include a 5% buffer – WCC's table on page 3 of ED34b includes no buffer.

For decision making, from 1<sup>st</sup> July 2026 a 20% buffer must be added to the requirement (all of the requirement, not part of the requirement). Even taking 673 as the residual baseline requirement, the addition of a buffer across the five-year period results in a total requirement of 4,038 dwellings ( $673 \times 5 \times 1.20$ ). Against WCC's supply of 4,464 this represents 5.5 years (surplus of only 426 homes). Removing the 'allocations without planning permission' alone from the deliverable supply (total 461) would reduce the supply to below 5-years.

### **Phasing Policy**

Simply, if appropriate mitigation cannot be secured for any particular planning application WC can refuse planning permission. There is no need for the phasing policy.