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Dear Inspector

Winchester Local Plan – Housing Supply – comments on ED25 and ED34 a and b

O.b.o Vistry Homes – Land at Pitt Vale, Winchester

I write on behalf of Vistry Homes in response to Council documents ED25 and ED34 a and b submitted by the Council in relation to changes to the Plan Period via ED37 which includes an invitation to provide comments on the aforementioned documents. Vistry Homes have seen sight of the HBF representations and support the commentary they have made.

Document ED25 sets out the housing requirement (based on the Standard Method), housing supply and the quantum of housing available to meet unmet need with the base date of the Local Plan set to 2020, 2022 and 2023. The Inspector also requested information should the Plan Period be set from 2024.

As per comments previously raised on behalf of Vistry Homes, Vistry maintain that 2024 is a suitable base date for the Local Plan to commence. The Standard Method utilises population projections from the relevant base year (in this case, from 2024), alongside housing affordability data (in this case, the median affordability ratio for 2023 which was published in 2024). In addition, the SHMA Final Report is dated July 2024. 2024 therefore remains a suitable start date for the Local Plan.

ED34a notes that there is no guidance in national policy relating to the start date of the Local Plan. However, it is illogical to start the Plan Period in 2020 and no meaningful justification has been provided on this basis. The original Housing Topic Paper justified the 2020 start date on the basis of allowing for earlier completions to be taken into account. Whilst the 2025 Housing Topic Paper attempted to provide additional justification, it simply relied upon the lack of national policy in providing clear guidance on start dates.

Again, Vistry maintain that the 2024 base date is appropriate given the evidence base and argue that an earlier period should not be used in order to artificially inflate completions across the Plan Period. In addition, the extant housing completions in the early part of the Plan Period are completions that will have fed into the Standard Method assessment of local housing need. This results in conflating housing needs with supply.

ED 34a sets out justification for the quantum of unmet need allowance and notes that the unmet need allowance would reduce if the start date in the Local Plan is moved forwards. However, based on the justification set out in the original Housing Topic Paper, the early years of the Plan accounted for housing already completed. However, it has



not been set out in any documents that the completions from the early years of the Plan Period accounted for unmet need in Portsmouth and Havant. Instead, the figure in the Local Plan which forms the unmet need allowance is simply a surplus of homes rather than a fixed figure; hence if the Plan Period timeframe changes, the unmet needs allowance also changes. This does not demonstrate effective Duty to Co-operate and it undermines the Local Plan. It also demonstrates that, through the preparation of the Local Plan, there was a lack of proactive planning to identify additional sites which would provide the housing supply required to 'fix' the unmet need allowance.

This is of utmost importance given that Havant and Portsmouth are preparing their emerging Local Plans under the new regime set out in the 2024 NPPF which means they are providing for increased housing needs. This has a subsequent impact of significantly increasing the level of unmet need, both in these authorities and across the whole of PfSH. For WCC to argue that changing the base date of the Plan Period would erode the unmet need allowance is unfounded as there is a wider concern regarding unmet need in the area in light of the allowance set out in the WCC Local Plan.

Document ED34b includes an assumption that 350 homes would be delivered within the SDNP. However, during the Examination process, the South Downs National Park Authority (SDNPA) made representations to indicate that it does not consider 350 homes achievable within the National Park Area. The evidence submitted by WCC therefore contains a clear discrepancy and the documents provided by WCC should be amended to take account of 250 homes within the SDNPA rather than 350 homes. The unmet need allowance would contribute towards Havant and Portsmouth supply, with no allowance remaining to contribute towards any shortfall in SPNP. This would result in a shortfall of housing delivery which the draft Local Plan does not provide a solution for.

Yours sincerely

Mandy Owen
Associate Director