

To	Ms Jill Taylor (Programme Officer)
From	Ben Pycroft (Emery Planning)
On behalf of	Barwood Land (ID: ANON-AQTS-329R-9)
Date	18 th July 2025

Comments on ED25, ED34a and b

Introduction

- SD01 sets out a plan period from 2020 to 2040. The proposed housing requirement is 15,465 dwellings including the SDNP and 15,115 dwellings excluding the SDNP (i.e. $15,465 - 350 = 15,115$). The 15,115 figure comprises of 13,565 dwellings to meet Winchester's housing needs minus 350 dwellings within the SDNP and plus 1,900 dwellings to address unmet need in neighbouring authorities. (We note that SD14a proposes to modify the requirement from 15,115 to 15,040 dwellings).
- ED25, ED34a and b set out that if the start date of the Local Plan is amended then the housing requirement would be reduced as set out in the following table¹.

Start date	Winchester's housing need	Unmet need from neighbouring authorities	Total requirement
2020	13,565	1,900	15,465
2022	12,214	1,099	13,313
2023	11,507	714	12,221
2024	10,816	290	11,106

- As can be seen in the table above, the housing requirement would reduce from that set out in SD01 because:
 - Firstly, the plan period would be shorter and consequently Winchester's housing need (including the SDNP) would be over a shorter period; and

¹ NB the figures include the SDNP

- b. Secondly, the Council proposes to reduce the unmet need from neighbouring authorities it can accommodate. This is because the Council claims the unmet need figure should be informed by the supply “available”.
4. The Council claims that under each scenario, its Five Year Housing Land Supply (5YHLS) would not materially change. This is essentially because the Council is proposing to reduce the requirement.
5. We comment as follows.

Plan period

6. The plan period should be 2024 to 2040. This is because the (pre-December 2024) standard method for calculating local housing need (LHN) is used as the basis for calculating Winchester’s housing needs and as the Local Plan Inspector (David Reed) stated in examining the North Norfolk Local Plan:

“The local housing need methodology takes account of any previous over or under supply, so there is no shortfall or surplus arising pre 2024 to add to this figure”

7. The affordability adjustment in step 2 of the standard method takes account of past delivery (please see paragraphs 68-031-20190722 and 2a-011-20190220 of the PPG).
8. Therefore, by using the LHN at 2024, any past over or under supply pre-2024 has already been factored into the calculation of LHN and therefore the base date of the Local Plan should have the same date as the LHN calculation.

Housing requirement

9. Even on the Council’s figures, the housing requirement should be (at least) 12,716 dwellings (including the SDNP). This is 10,816 dwellings to meet Winchester’s needs over the period 2024 to 2040 (i.e. $676 \times 16 \text{ years} = 10,816$) plus 1,900 dwellings to meet unmet needs from neighbouring authorities. Excluding 312 dwellings for the SDNP (ED34b, page 1 shown in red), the requirement would be 12,404 dwellings (i.e. $12,716 - 312 = 12,404$). This would equate to an annual requirement of 775 dwellings (i.e. $12,404 / 16 \text{ years} = 775.25$).
10. Notwithstanding the outstanding objections to the 1,900 figure to meet unmet need, this is the figure the Council considers is justified – including through the DtC process. It should not be reduced if the start date of the plan is changed. A reduction of the unmet need from 1,900 to 290 dwellings is not justified.

5YHLS

11. The tables in red on pages 3 and 5 of ED34b are incorrect. The 10,816 figure in row a of each table includes the SDNP and does not include the unmet need. The table in red on page 5 of ED34b applies a 5% buffer for 1 year and 20% buffer for 4 years. There is no support in the NPPF for this approach; either the 5% or 20% buffer applies.

12. In accordance with paragraph 77 of the NPPF, the 5YHLS will be measured against the adopted housing requirement. As above, this would be 775 dwellings per annum. At 1st April 2025, there would be a shortfall of 53 dwellings (i.e. 775 – 722 completions in 2024/25 = 53), which should also be addressed in the 5YHLS period (PPG para 68-031-20190722) and in practice a 5% buffer (re-introduced in the December 2024 Framework) would apply until 1st July 2026 when the 20% buffer will apply (December 2024 NPPF, paragraph 74c).
13. The following table shows the Council’s deliverable supply of 4,464 dwellings and our supply figure² of 3,419 dwellings against the 5YHLS requirement as follows:

		Council	Barwood
A	Annual requirement	775	
B	5YHLS requirement without shortfall or buffer (A X 5)	3,875	
C	Shortfall at 1 st April 2025	53	
D	5YHLS requirement plus shortfall (B + C)	3,928	
E	5YHLS requirement plus 5% buffer (D + 5%)	4,124	
F	Annual 5YHLS requirement and 5% buffer (E / 5)	825	
G	5YHLS requirement plus 20% buffer (D + 20%)	4,714	
H	Annual 5YHLS requirement and 20% buffer (G / 5)	943	
I	Supply at 1 st April 2025	4,464	3,419
J	Supply in years against 5YHLS requirement plus 5% buffer (I / F)	5.41	4.14
K	Supply in years against 5YHLS requirement plus 20% buffer (I / H)	4.73	3.63

14. The table after paragraph 1.25 of Barwood’s Matter 4 statement explains why the deliverable supply is 3,419 dwellings at 1st April 2025 (as discussed on day 3 of the examination hearing sessions).

Over-supply

15. As above, once the correct housing requirement is used, there would be a shortfall at 1st April 2025 of 53 dwellings. However, the Council’s 5YHLS calculations seek to reduce the housing requirement by “over-supply”. The size of the Council’s claimed over-supply varies depending on the start date of the plan period. There is no justification for reducing the requirement by over-supply for the reasons set out in paragraph 1.24 of Barwood’s Matter 4 statement.

² Barwood Matter 4 statement – paragraph 1.28

Policy H2

16. We maintain policy H2 should be deleted as explained in Barwood's representations and Matter 4 statement.