

EXAMINATION OF THE WINCHESTER DISTRICT LOCAL PLAN

COMMENTS ON BEHALF OF CROUDACE HOMES LIMITED

Meeting Housing Need – Comments on ED25 and ED34a and b

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COMMENTS ON BEHALF OF CROUDACE HOMES LIMITED

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15 July 2025

1. Introduction

- 1.1 This Statement provides comments on behalf of Croudace Homes Limited ("Croudace"), to Examination Documents ED25 and ED34a and b produced by the Council.

2 Meeting Housing Needs – Comments on ED25 and ED34a and b

- 2.1 Documents ED25 and ED34a and b produced by the Council are intended to assist the Inspector by showing the implications of the Plan period commencing in 2024 in addition to the deletion of Policy H2. Croudace's comments on Policy H2 have been dealt with in its Matter 4 Statement and also through oral evidence and are not repeated here.
- 2.2 **Firstly**, and as set out in our evidence, Croudace considers that the correct Plan period commencement year is 2024. It should not therefore be necessary or appropriate to consider the other scenarios presented by the Council for 2020, 2022 and 2023.
- 2.3 **Secondly**, it is clear from the Council's documents that its approach to the matter of meeting unmet need has been to 'see what is left over' once it has met its own Local Housing Need ("LHN"). This was in fact the way that the Council's case was presented at the Examination Hearing Sessions by Mr Opacic.
- 2.4 The Council's approach to unmet need, which is incorrect and flawed, has infected its housing delivery strategy and trajectory and, as we have set out in our evidence, leads to a failure to comply with the Duty to Cooperate ("DtC").

- 2.5 **Thirdly**, the Council's approach to setting its housing requirement also appears to be supply based rather than need based. This is clearly demonstrated in ED34b that applies the LHN of 676 dpa and ignores the Plan requirement figure of 756 dpa as set out in the Submission Version of the Plan (Policy H1 in SD01) i.e. because the Council is being asked to shorten the Plan period and consequently remove its completion data between 2020 – 2024, it has moved its previous allowance for unmet need and reverted to the LHN in order to 'balance the books'. That approach is incorrect.
- 2.6 As discussed at the Examination Hearing sessions, the Council must first establish the housing requirement figure for the Plan, which it has done in Policy H1. It must then demonstrate that the Plan is capable of delivering sufficient deliverable and developable supply to meet that requirement over the Plan period, which it has not done.
- 2.7 If the position advanced in ED25 and ED34a and b is now the Council's position on requirement i.e. 676 dpa, then it MUST have failed the DfC because it has ignored its own limited evidence base on unmet need. Its change in position from the submission stage is also wholly without evidential justification. The reality is that the Council has taken this approach in order to attempt to demonstrate that by using the correct Plan period commencement date of 2024 its supply is still sufficient to meet need, when it clearly is not.
- 2.8 Neame Sutton has undertaken some additional housing trajectory analysis contained in the two attached trajectories (Trajectory A and B). The first trajectory confirms that when the Council's own requirement and supply data is applied there will be a shortfall of **-1,182 dwellings** at the end of the Plan period. That is not a sound housing delivery strategy and effectively fails to deliver any unmet need.
- 2.9 Trajectory B demonstrates that when the Annex 2 definitions of Deliverability and Developability are applied to the Council's supply sources the level of shortfall increases to **-1,642 dwellings** at the end of the Plan period. Additionally, Trajectory B demonstrates that at no point during the Plan period will the Council be able to demonstrate a 5-year supply of deliverable housing sites. That is an abject failure of the Plan.

2.10 In conclusion, there are a number of implications of changing the Plan period commencement date to 2024 and applying the latest calculation of LHN (which is the correct approach):

1. The Council's failure to comply with the DtC specifically in relation to the matter of unmet need is fully exposed;
2. The Plan will fall short of meeting its minimum housing requirement set out in Policy H1 by at least **-1,182 dwellings**; and,
3. When the Annex 2 definitions of Deliverable and Developable are correctly applied to the Council's supply sources the Plan will fall even further short by - **1,642 dwellings** and will fail to demonstrate a 5-year housing land supply at any point during the Plan period.

2.11 Whilst Croudace wishes to rely on its previous evidence in relation to the deletion of Policy H2, it is clear from the above that Policy H2 MUST be removed because it will artificially delay delivery of sites in circumstances where the Council cannot event meet its minimum housing requirement set against the old Standard Method¹. With the need for an immediate Plan review to take place to address the new Standard Method² figure of 1,147 dpa the Council has absolutely no case for retaining Policy H2.

2.12 The Plan therefore fails the legal compliance test in relation to DtC and is unsound in terms of the housing delivery trajectory and 5-year housing land supply.

Word Count: 933

¹ Calculated by reference to the Framework 2023

² Calculated by reference to the Framework 2024



Housing Trajectory A - COUNCIL POSITION - Sedgefield 5% - Plan period commencing 2024

As at: 14-Jul-25

Plan Period	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
Supply Sources	Pre-Adoption					Years 1-5					Years 6-10					Years 11-14					TOTAL
	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	
Completions																					0
Small Sites (AMR App 3.3)					61	61	61	61	61												305
Large Sites with Full Planning Permissions					69	147	90	0	0	30											336
Existing Local Plan Allocations with Full Planning Permission					47	70	44	70	100	79	50	42									502
Existing Local Plan Strategic Allocations					545	565	535	535	485	460	410	341	215	190	149	90	53	40			4613
Large Sites with Outline Planning Permission (not allocated)																					0
Communal Planning Permissions (dwelling equivalents)						11	38	22													71
Local Plan 2040 Allocations (without planning permission)							14	30	157	260	260	555	598	495	350	315	260	150			3444
Other Existing Allocations (without planning permission)								-2	10	10		10									28
Windfall Allowance							115	115	115	115	115	115	115	115	115	115	115	115	115	115	1610
TOTAL SUPPLY	0	0	0	0	722	854	897	831	928	954	835	1063	928	800	614	520	428	305	115	115	10909
Requirement					756	756	756	756	756	756	756	756	756	756	756	755	755	755	755	755	12091
Annual Shortfall/Surplus					-34	98	141	75	172	198	79	307	172	44	-142	-235	-327	-450	-640	-640	
Cumulative Shortfall/Surplus					-34	64	205	280	452	650	729	1036	1208	1252	1110	875	548	98	-542	-1182	
Base 5 Year Requirement					3780	3780	3780	3780	3780	3780	3780	3779	3778	3777	3776	3775					
Shortfall/oversupply (Sedgefield)					-34.0	64.0	205.0	280.0	452.0	650.0	729.0	1036.0	1208.0	1252.0	1110.0	875.0					
5 Year Requirement with Shortfall/oversupply					3814.0	3716.0	3575.0	3500.0	3328.0	3130.0	3051.0	2743.0	2570.0	2525.0	2666.0	2900.0					
Adjuste 5 Year Requirement with 5% Buffer					4004.7	3901.8	3753.8	3675.0	3494.4	3286.5	3203.6	2880.2	2698.5	2651.3	2799.3	3045.0					
Adjusted Annual Requirement (5yr)					800.9	780.4	750.8	735.0	698.9	657.3	640.7	576.0	539.7	530.3	559.9	609.0					
5 Year Supply					4232	4464	4445	4611	4708	4580	4240	3925	3290	2667	1982	1483					
Supply in Years					5.28	5.72	5.92	6.27	6.74	6.97	6.62	6.81	6.10	5.03	3.54	2.44					

Shortfall Against Requirement

-1182

Notes:

- 1 Annual Requirement from Reg 19 Local Plan Policy H1, which is 15,115 over the 20 year period and not the figure shown in the trajectory in the Housing Topic Paper or Council Matter 4 Statement
- 2 Supply taken from Council Matter 4 Statement Trajectory 2024 - 2040
- 3 Sedgefield Method of dealing with the shortfall/oversupply
- 4 5% Buffer in accordance with the 2023 HDT published on 12 December 2024



Housing Trajectory B - NEAME SUTTON POSITION ON SUPPLY - Sedgefield 5% - Plan Period Commencing 2024

As at: 14-Jul-25

Plan Period	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
Supply Sources	Pre-Adoption					Years 1-5					Years 6-10				Years 11-14						TOTAL
	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	
Completions																					0
Small Sites (AMR App 3.3)					61	61	61	61	61												305
Large Sites with Full Planning Permissions					69	147	90	0	0	30											336
Existing Local Plan Allocations with Full Planning Permission					47	70	44	70	100	79	50	42									502
Existing Local Plan Strategic Allocations					545	565	535	535	485	460	410	341	215	190	149	90	53	40			4613
Large Sites with Outline Planning Permission (not allocated)																					0
Communal Planning Permissions (dwelling equivalents)						11	38	22													71
Local Plan 2040 Allocations (without planning permission)						0	0	0	0	0	217	232	330	505	590	495	350	315	260	150	3444
Other Existing Allocations (without planning permission)								0	0	0	8	10	10								28
Windfall Allowance							0	0	0	0	115	115	115	115	115	115	115	115	115	115	1150
TOTAL SUPPLY	0	0	0	0	722	854	768	688	646	569	800	740	670	810	854	700	518	470	375	265	10449
Requirement					756	756	756	756	756	756	756	756	756	756	756	755	755	755	755	755	12091
Annual Shortfall/Surplus					-34	98	12	-68	-110	-187	44	-16	-86	54	98	-55	-237	-285	-380	-490	
Cumulative Shortfall/Surplus					-34	64	76	8	-102	-289	-245	-261	-347	-293	-195	-250	-487	-772	-1152	-1642	
Base 5 Year Requirement					3780	3780	3780	3780	3780	3780	3780	3779	3778	3777	3776	3775					
Shortfall/oversupply (Sedgefield)					-34.0	64.0	76.0	8.0	-102.0	-289.0	-245.0	-261.0	-347.0	-293.0	-195.0	-250.0					
5 Year Requirement with Shortfall/oversupply					3814.0	3716.0	3704.0	3772.0	3882.0	4069.0	4025.0	4040.0	4125.0	4070.0	3971.0	4025.0					
Adjuste 5 Year Requirement with 5% Buffer					4004.7	3901.8	3889.2	3960.6	4076.1	4272.5	4226.3	4242.0	4331.3	4273.5	4169.6	4226.3					
Adjusted Annual Requirement (5yr)					800.9	780.4	777.8	792.1	815.2	854.5	845.3	848.4	866.3	854.7	833.9	845.3					
5 Year Supply					3678	3525	3471	3443	3425	3589	3874	3774	3552	3352	2917	2328					
Supply in Years					4.59	4.52	4.46	4.35	4.20	4.20	4.58	4.45	4.10	3.92	3.50	2.75					

Shortfall Against Requirement

-1642

Notes:

- 1 Annual Requirement from Reg 19 Local Plan Policy H1, which is 15,115 over the 20 year period and not the figure shown in the trajectory in the Housing Topic Paper or Council Matter 4 Statement
- 2 Supply taken from Council Matter 4 Statement Trajectory 2024 - 2040
- 3 Sedgefield Method of dealing with the shortfall/oversupply
- 4 5% Buffer in accordance with the 2023 HDT published on 12 December 2024
- 5 Adjustments made to Cat B sites to remove from current 5 year period as no evidence presented by Council that they are Annex 2 compliant
- 6 Adjustments made to windfalls in current 5-year period as no evidence that they have a) not double counted with small site consents category and b) compelling evidence for inclusion in the 5-year period