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Winchester District Local Plan

Winchester District Local Plan 2040

Housing Topic Paper Update

January 2025



Winchester
City Council

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Purpose and Structure of the Topic Paper

- 1.1. The Proposed Submission (Regulation 19) Local Plan was published for consultation in Autumn 2024, with views requested on the soundness and legal compliance of the Plan. Some of the representations received refer to changes proposed by the Government to the National Planning Policy Framework (NPPF) in July 2024 or raise matters addressed in the Housing Topic Paper of July 2024.
- 1.2. This updated Housing Topic Paper responds to some of the key issues raised by the changes to the NPPF (published on 12 December 2024 NPPF) and in representations, in order to clarify the Council's position. This Topic Paper Update does not seek to summarise or address in any detail all of the matters raised in representations, but rather to provide an update on some key matters which are likely to be explored by the examining Inspector.
- 1.3. This Topic Paper Update relates primarily to the Local Plan housing requirement, how it relates to the existing and revised NPPF and updates the position in relation to the Duty to Cooperate and unmet housing needs. The opportunity is also taken to update housing supply information to an April 2024 base date and provide a more detailed housing trajectory and 5-year land supply position for the Local Plan. The Paper is structured as follows:
 - Purpose and Structure of the Topic Paper
 - Revised NPPF, December 2024
 - The Local Plan Period / Past 'Over-Provision'
 - Duty to Cooperate / Unmet Housing Needs / Reasonable Alternatives
 - Housing Supply Update to April 2024 / Housing Trajectory
 - 5 Year Land Supply / Phasing

2. Revised NPPF, December 2024

- 2.1. The new Government consulted from late July to late September 2024 on its proposed approach to revising the National Planning Policy Framework in order to achieve sustainable growth. This consultation overlapped with the final approval stages of the Regulation 19 Local Plan and consultation on it (from late August to mid-October 2024). As a result, various representations on the Local Plan suggested that the Plan would need to be reconsidered, or withdrawn, in the light of the NPPF changes proposed, particularly the changes proposed to the 'Standard Method' and the substantially higher housing requirements arising.
- 2.2. The consultation draft NPPF included proposed transitional arrangements for Local Plans which are well advanced, such as Winchester's. Paragraph 226c of the draft NPPF set out that plans which are submitted for examination within 1 month of publication of the final revised NPPF will be examined under the previous version of the Framework (footnote 87 clarifies that this is the December 2023 NPPF). Paragraph 227 of the draft NPPF expected that, where a local plan is adopted in accordance with paragraph 226c and its housing requirement is more than 200 dwellings per annum below the proposed new standard method, the authority should commence plan-making under the new system at the earliest opportunity.
- 2.3. The revised NPPF was published and came into effect on 12 December 2024, with the transitional arrangements now contained in paragraphs 234-243. For the avoidance of doubt, the Council has submitted the Local Plan 2040 in accordance with paragraphs 234(b) and 235 of the revised NPPF, which provide for plans submitted for examination before 12 March 2025 to be examined on the basis of the previous (December 2023) NPPF. The Regulation 19 Local Plan was developed and approved on the basis of the earlier NPPF, but in the knowledge of an imminent revision to the NPPF and its transitional arrangements.
- 2.4. While various respondents question or criticise the Council's decision to progress with the Local Plan on this basis, this was a decision for the Council, not a matter for the Local Plan examination. The NPPF now requires the examining Inspector to assess the Plan on the basis of its transitional arrangements, as set out at paragraphs 234-235, not to revisit the decision to submit it. Some respondents also suggest that to proceed under the transitional arrangements does not reflect the Government's emphasis on increasing housing delivery. However, getting up to date local plans in place is also a key part of the Government's strategy, so the transitional arrangements are just as much a part of the Government's aims as the changes to the Standard Method.
- 2.5. Nonetheless, there are clear benefits in the approach the Council is pursuing, including:

- Being the quickest and most efficient way to achieve an up to date adopted Local Plan, which remains a Government priority (NPPF paragraph 1);
- Providing stability and simplification of planning policies by updating and replacing the existing Local Plan Parts 1 and 2 and the Traveller DPD, which are becoming out of date in parts (e.g. climate change / sustainable construction standards, design, housing requirements, and affordable housing), with one up to date Plan;
- Putting in place policies on key topics which have been subject to ongoing consultation and are better aligned to Government policy and the Council's aims. These include new/updated policies on climate change, design and housing types, as well as allocating new housing sites and updating existing allocations;
- Enabling existing high levels of housing completions to be maintained prior to the review of the Plan required by NPPF paragraph 236. Dwelling completions for the first 13 years of the Local Plan period (to 2033/33) average 934 dwellings per annum, which is within 20% of the new Standard Method requirement for the District of 1,157 dwellings per annum;
- Avoiding the need to completely 'start again' on the Local Plan due to the scale of increase in housing requirements. This would require various key elements of the evidence base to be updated or renewed. Due to the potential scale of the increase in housing requirement this would require going back to development options, updating the Local Plan Evidence Base which would in itself would be very costly and time-consuming to produce, as well as consultation on new development options and draft policies/allocations. It would be very unlikely that all of this could be achieved in timescale as envisaged by the NPPF;
- Having an up to date plan in place while the proposed review is undertaken to plan for the higher housing requirements of the new NPPF/Standard Method. This will maintain a 5-year housing land supply and minimise the risk of planning by appeal or development that is not properly planned or plan-led.

2.6. Progressing the submitted Local Plan to adoption has clear advantages in providing a basis for planning decisions within the Local Plan area and supporting development delivery whilst longer-term work is undertaken on a review, as required by NPPF paragraph 236. The Council is satisfied that the Local Plan as submitted is sound and in accordance with the December 2023 version of the NPPF. It acknowledges that the housing requirement over the Plan period is less than 80% of the new Standard Method figure (although more this this can be achieved until 2033/34) and that paragraph 236 of the NPPF expects work to begin *'on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need'*.

2.7. Proposed modifications have been put forward in relation to policy SP2 and its explanatory text to show the Council's commitment to an early review of the Plan (Proposed Modifications PM2 and PM3, November 2024). The Deputy Prime Minister has asked all local planning authorities produce an updated Local Development Scheme (LDS) within 12 weeks of the publication of the NPPF, i.e. by 6th March 2025 ([Chief Planner's newsletter December 2024](#)). The Council is in the process of undertaking such an update, which will set out the proposed timescale for the Local Plan review.

3. The Local Plan Period / Past ‘Over-Provision’

3.1. Various representations on the Local Plan criticise the use of a 2020 start date for the Local Plan and/or the inclusion of housing completions since 2020. Some also allege past under-provision of housing or refer to alternative methods for calculating under/over-provision. This section responds to those matters.

Introduction of the Standard Method

3.2. Firstly, it is important to acknowledge the fundamental change resulting from the introduction of the Standard Method and updated NPPF in 2018. Some representations refer to the Council’s ‘Authorities Monitoring Reports’ (AMRs) and the pre-Standard Method calculation of housing requirements and provision. However, whilst it is appropriate to consider these in the AMRs, as these are monitoring the existing Local Plan from its start date in 2011, the pre-2018 position is not relevant to the new Local Plan.

3.3. Since 2018 the NPPF has confirmed that the Standard Method should be used to determine the minimum number of homes needed (2023 NPPF, paragraph 61), with no reference made to any shortfalls from previous methodologies. The introduction of the Standard Method effectively ‘reset the clock’ in terms of housing requirements, as confirmed by the accompanying Planning Practice Guidance (PPG) on Housing and Economic Needs Assessments:

*‘The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore **it is not a requirement to specifically address under-delivery separately.***

‘Where an alternative approach to the standard method is used, past under delivery should be taken into account.’ (PPG paragraph: 011 Reference ID: 2a-011-20190220, emphasis added)

3.4. The Local Plan uses the Standard Method, not an alternative approach, so it is clear that allegations of pre-2018 under-delivery are irrelevant to the new Local Plan. Similarly, discussions about how any alleged under-provision is measured are not relevant to this Plan. Delivery of housing since the introduction of the Standard Method in 2018 is, however, a relevant matter for the new Local Plan.

The Local Plan Period

3.5. The emerging Local Plan originally used a 2018 base date with a 20-year Plan period ending in 2038 (Strategic Issues and Priorities consultation 2021). This needed to be updated to meet the NPPF’s expectation that the Plan ‘*look[s] ahead over a minimum 15 year period from adoption*’ (2023 NPPF, paragraph 22) and the base date is now 2020. It is notable that few, if any, respondents question the Local Plan end date’s compliance with the NPPF, with objections

focusing on the start date, even though this is not subject to any NPPF or PPG guidance. It is important to note that as the Local Plan needs to look ahead to 15 years it would be impractical and unreasonable to keep on changing the start and end dates of the Local Plan, which would result in identifying more sites and important studies like the Strategic Transport Assessment (which take over a year to complete) would never be able to complete.

3.6. In the absence of any NPPF or PPG requirements about the start date, it is for the planning authority to choose a suitable date. Apart from the fact that local plans in the District typically use a 20-year plan period, 2020 also aligns well with the date of key 'needs' studies that form part of the evidence base. The original Strategic Housing Market Assessment (SHMA), Employment Land Study, Retail Leisure and Town Centre Uses Study, and the Transport Assessment Stage 1 were all published in 2020. While it has been necessary to conduct partial updates of this evidence to maintain its relevance, the 2020 studies informed the Strategic Issues and Priorities (SIP) consultation in 2021 and the subsequent development of the Local Plan.

3.7. A similar approach was adopted by the Hart District Local Plan Inspector who considered that plan period should start earlier to be consistent with the evidence base:

*'It is important to emphasise that the calculation of housing need is not an exact science. Overall and having regard to all of the above findings, I consider that an OAHN of 382 dpa is robust and should be used as the starting point for the consideration of the housing requirement in the Plan. As a consequence, **it is necessary to correlate the start of the Plan period, with the base date of the SHMA, which is 2014**, particularly as this results in a greater level of overall need, given its longer timeframe (2014-2032). **The Plan needs to therefore be clear that the Plan period is 2014 to 2032 and changes are needed (MM1, MM18, MM19, MM21, MM23, MM121 and MM140) for the Plan to be effective.** The housing trajectory and completion figures (from 2014) in the Plan therefore also need to be amended (MM139 and MM140) to reflect this change. This will also ensure the Plan is effective and in accordance with national policy.'* ([Hart District Local Plan Inspector's Report, February 2020](#), paragraph 31. Emphasis added)

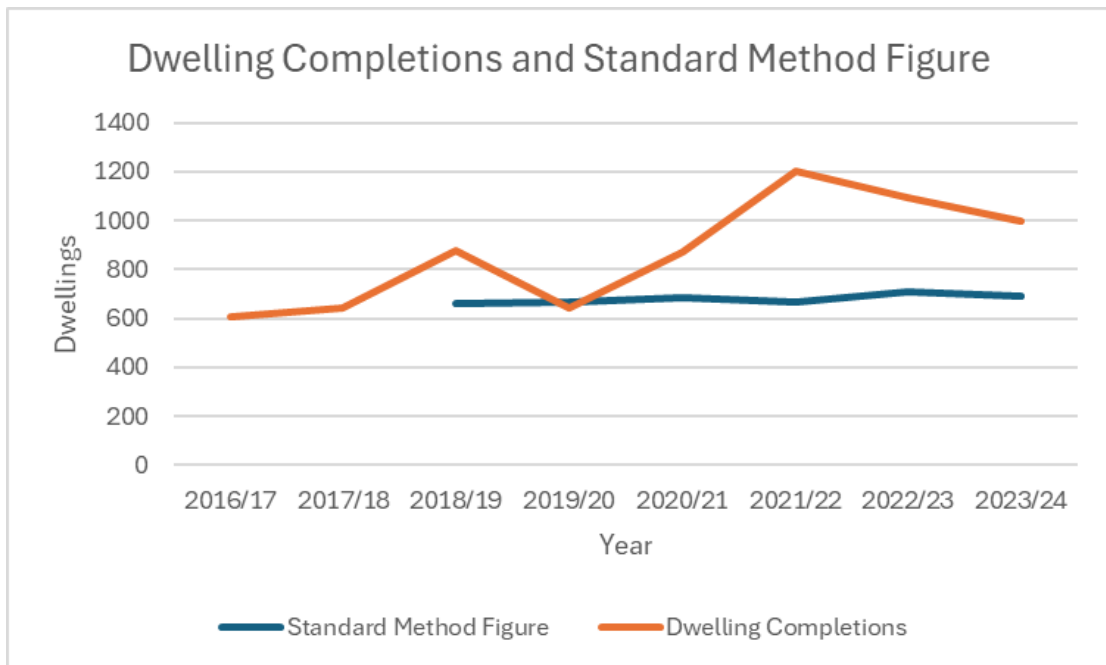
3.8. It is acknowledged that the Hart Inspector is dealing with 'objectively assessed housing need' rather than the Standard Method, but this Inspector's report shows that it is entirely appropriate and NPPF-compliant for a local plan period to start well before its adoption date. The Hart Inspector's report was in 2020 and the Plan was adopted in the same year, 6 years after the start date recommended by the Inspector for the Plan to be 'effective'.

Past Over-Provision

- 3.9. Various representations by development interests challenge the Plan period on the basis that it allows account to be taken of recent levels of ‘over-provision’ compared to the relevant Standard Method figures. As noted above, the 2018 NPPF and Standard Method introduction ‘reset the clock’ in terms of housing requirements and expect use of the Standard Method as the starting point. There is no NPPF or PPG guidance on the start date for local plans and, as also explained above, 2020 is an entirely legitimate and logical start date.
- 3.10. While some representations acknowledge the Council’s recent good performance against the Standard Method figure, they allege that taking account of this amounts to double-counting as it is already factored into the Standard Method. These respondents suggest that past supply has influenced the affordability uplift going forward. As demonstrated below, this is not the case.
- 3.11. The Standard Method calculation comprises 2 key elements: the projected increase in households and an ‘affordability multiplier’. It is impossible for the household projections to be influenced by recent completion levels, as the relevant PPG is clear that 2014-based household projections should be used (Paragraph: 005 Reference ID: 2a-005-20190220).
- 3.12. With regard to the affordability multiplier, this is calculated using a ratio of local house prices to workplace-based earnings. Clearly workplace-based earnings are not influenced directly by recent dwelling completions, so the only aspect of the Standard Method that could potentially be affected by these is local house prices. The suggestion in some representations appears to be that if local completion rates are above the Standard Method figure affordability will improve and the next Standard Method calculation will go down. However, it is not accepted that there is such a direct link between completion rates and affordability or that, even if there were, this should prevent account being taken of recent completions.
- 3.13. Firstly, new homes only add a modest amount annually to the housing stock, so the effect of new home completions on overall house prices will be very limited. Even with new home completions of around 1,000 dwellings per annum in Winchester over recent years, this adds less than 2% annually to the District housing stock of 56,000. In fact, the amount by which recent completions exceed the Standard Method figure, which is what respondents allege influences affordability, has only been higher than 300 dwellings per annum in the past 3 years (see Table 1 below), which is around 0.5% of the housing stock. While new home sales will form a higher proportion of total sales, the direct impact of any increases or decreases in new home completion rates on affordability will be slight at most.

3.14. This is illustrated by the graph below, comparing dwelling completions (including communal units) in the District to changes in the Standard Method figure:

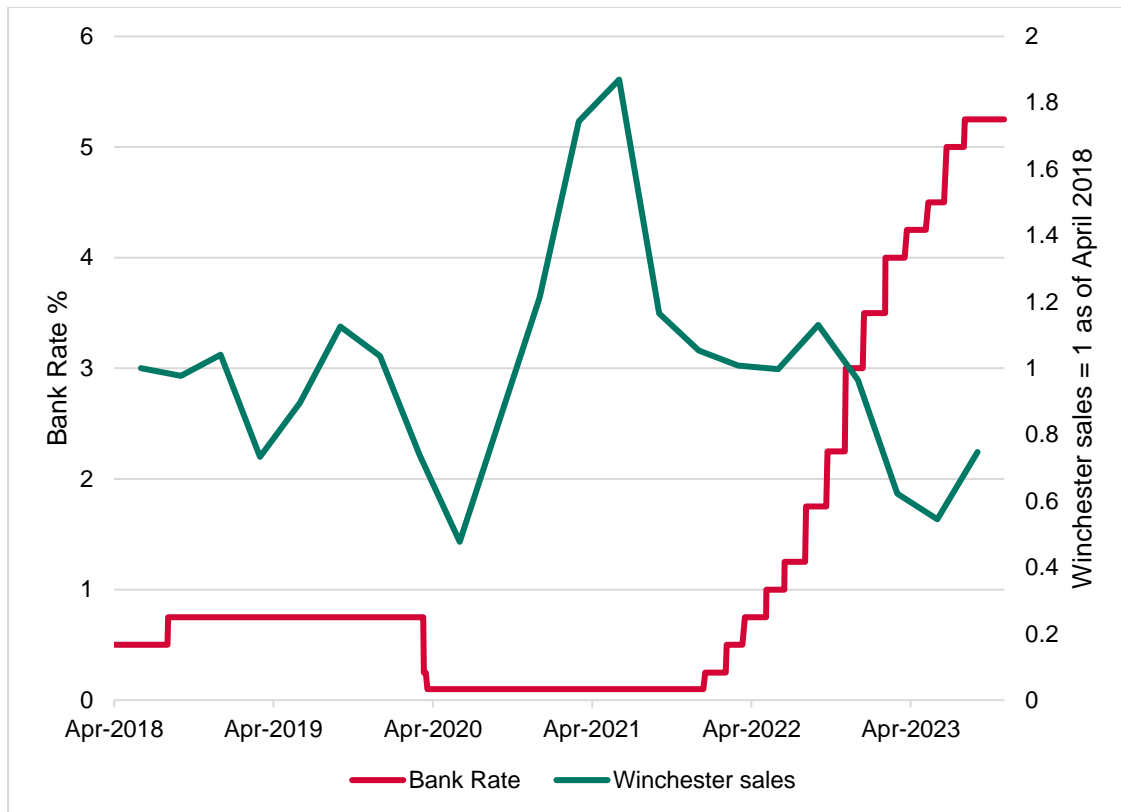
Figure 1: Dwelling Completions and Standard Method Figure



3.15. If the affordability multiplier were influenced by dwelling completions exceeding the Standard Method figure it would be expected that there would be a significant decrease in the SM figure to reflect the large increase in recent completions (almost doubling from 606 in 2016/17 to 1,201 in 2021/22). However, the graph shows that there has been very little fluctuation in the SM figure and that in fact it has grown from 659 in 2018/19 to 691 in 2023/24, despite very high completion levels. Therefore, it can be seen that there is no direct correlation between completion levels and the affordability multiplier.

3.16. Instead, the key factors influencing house prices, whether locally or nationally, are interest rates and economic performance. Figure 2.2 of the [Winchester Strategic Housing Market Assessment Update 2024](#) illustrates this:

SHMA 2024 Figure 2.2: Indexed sales in Winchester District against Bank of England Base Rate (2018 to 2023)



Sales are closely linked to mortgage rates, peaking during 2020-2021 when mortgage rates were at their lowest, and dropping sharply with the interest rate rises of 2022.

3.17. The SHMA concludes that *‘in Winchester, there is little indication yet that house prices are beginning to fall, however, the rate at which they had historically been increasing has slowed.... Housing delivery in Winchester has improved strongly since 2018/2019. This may be contributing to some of the slower rates of house prices growth seen in recent years in Winchester and should this continue, this will assist in easing affordability pressures in Winchester’* ([Winchester Strategic Housing Market Assessment Update 2024](#), paragraph 2.13). It is clear that high levels of dwelling completions do not directly influence the affordability ratio, as suggested by some respondents, at least in the short term. At most, these may help to slow increases in house prices and might ease affordability in the longer term.

3.18. Obviously the counting of completions from 2020 is not ‘double counting’, as some representations suggest, and failure to include them would take no account at all of recent good performance in housing delivery and homes being delivered on the ground. It is entirely legitimate that this should be taken into account, especially given that the Standard Method ‘reset the clock’ in terms of housing requirements. In fact, the Council is only seeking to count completions from 2020 rather than since 2018, even though Table 1 below demonstrates that ‘over-provision’ since 2018 is even higher.

Table 1: Standard Method Figure and Dwelling Completions 2018-2024 (Winchester District, including 'communal')

Year	Standard Method Figure	Dwelling Completions	Under/Over-Provision
2018/19	659	875	+216
2019/20	666	643	-23
2020/21	685	874	+189
2021/22	666	1201	+535
2022/23	707	1095	+388
2023/24	691	1,000	+339
TOTAL 2018-2024	4,074	5,688	+1,614
TOTAL 2020-2024	2,749	4,170	+1,421

3.19. There has been substantial 'over-provision' against the Standard Method figure since it was introduced and clearly this should be taken into account in the new Local Plan, given the 'reset' brought about in 2018. While the Council could have sought to include the whole over-provision since 2018 of over 1,600 dwellings, it has only taken into account the 1,421 dwelling over-provision since 2020. It considers that it is more appropriate and transparent to use the Plan period to account for this rather than to include a 2018-2024 over-provision figure and, for the reasons set out previously, 2020-2030 is the appropriate Plan period.

Conclusion

3.20. It is clear that the introduction of the Standard Method and the 2018 NPPF 'reset the clock' in terms of how local plan housing requirements should be assessed. There is no requirement to take account of any previous backlog and discussion of past backlogs or the method of calculating them is not relevant to the Local Plan 2040. Government advice on the Plan period relates solely to the end date being 15 years from adoption (2023 NPPF, paragraph 22) and the ability to fix the Standard Method figure for 2 years from submission of the Local Plan (accompanying PPG Paragraph: 008 Reference ID: 2a-008-20190220), with no guidance on the start date of the Local Plan.

3.21. It is entirely logical to use 2020, giving a 20-year Plan period and reflecting key elements of the evidence base. There is no 'double counting' of past completions and these have not materially influenced the Standard Method figure. It is entirely legitimate for the Council to take account of completions since 2020.

4. Duty to Cooperate / Unmet Housing Needs / Reasonable Alternatives

4.1. The Housing Topic Paper (July 2024) discussed the Duty to Cooperate and unmet housing needs in detail and remains relevant. This Topic Paper Update focusses on two DTC issues in particular arising from representations on the Regulation 19 Local Plan, namely the evolution of the unmet needs allowance in relation to work by PfSH and testing of reasonable alternatives, and the updates to the Statements of Common Ground with Portsmouth City and Havant Borough Councils and resulting modifications to the Local Plan.

Evolution of Unmet Needs Allowance / Reasonable Alternatives

4.2. Some representations on the Regulation 19 Local Plan suggest that there has been a failure to test reasonable alternatives during the development of the Plan, as the Council has long known about the likely scale of unmet needs in the PfSH area but did not test higher housing provisions to help address these. In particular, some respondents suggest that this should have been done at the Strategic Issues and Priorities (SIP) stage and assessed through the Integrated Impact Assessment (IIA).

Work by PfSH on Unmet Needs

4.3. PfSH adopted a 'Spatial Position Statement' in June 2016 which set out a strategy for apportioning housing requirements across the area. However, this was based on the 'objectively assessed housing needs' of authorities at the time and became redundant after changes to the NPPF and the introduction of the Standard Method in 2018. Therefore, in October 2018 PfSH authorities agreed to work together, under the Duty to Cooperate, to produce a Statement of Common Ground. By October 2019 PfSH had agreed a framework for the Statement of Common Ground and various evidence workstreams that would lead to the production of an updated Joint Strategy.

4.4. The first Statement of Common Ground (SOCG) was agreed by PfSH in September 2020 and was essentially an agreement to work together on various workstreams in order to produce an updated PfSH Joint Strategy. At this time the SOCG estimated a shortfall between housing requirements and supply of 10,750 dwellings (2020-2036). As explained in the Housing Topic Paper (July 2024), the 'shortfalls' identified do not equate to unmet housing need over the period concerned, but instead are 'snapshots' of the situation. Housing needs change over time, in line with the Standard Method and housing supply. The housing supply situation is based only on planning consents, allocations in adopted local plans, and SHELAA / windfall sites where justified. As the SOCGs and Spatial Position Statement consider the situation to 2036, all Local Plans within PfSH will need to be reviewed several times during this period, so have the opportunity to make additional provision.

- 4.5. Revisions and updates to the SOCG were presented to PfSH annually, in October 2021, December 2022 and September 2023. During this time the housing ‘shortfall’ changed annually with changes to the Standard Method and housing supply, emphasising that it could only be a generalised ‘snapshot’ at a point in time. When the [PfSH Spatial Position Statement 2023](#) was agreed in December 2023 the ‘shortfall’ stood at 11,771 dwellings.
- 4.6. The work on addressing the housing shortfall was initially focussed on identifying ‘Strategic Development Opportunity Areas’ (SDOAs). These were defined as sites above 20 hectares or 500 dwellings that have been previously promoted (through SHELAAAs) or considered as part of local and strategic planning processes. Consultants were appointed to identify these, and any further options, and then analyse and appraise potential SDOAs. The resulting [Broad Areas of Search for Growth Assessments 2023](#) were published as supporting evidence to the 2023 Spatial Position Statement.
- 4.7. The [PfSH Spatial Position Statement 2023](#) identified 7 ‘Broad Areas of Search’ for strategic-scale development, which it estimated could deliver 9,700 dwellings by 2036 (policy SPS8). One of these is within Winchester District (East of Botley). By this stage, it was recognised that the ‘Broad Areas of Search’ would not be able to address all the identified shortfall by 2036, although they may have greater capacity in the longer term. Winchester was instrumental in promoting a broader approach in the 2023 version of the SOCG, which encouraged those authorities that could exceed their Standard Method figure to do so in order to address unmet needs more fully. This was subsequently incorporated into the [PfSH Spatial Position Statement 2023](#) at paragraphs 6.33 and 6.34.

Work on the Local Plan

- 4.8. Looking at the development of the Local Plan against the timing of work on the PfSH Statements of Common Ground and Spatial Position Statement, the following timeline can be drawn:

Table 2. Local Plan and PfSH Spatial Position Statement Timelines

Stage of Winchester Local Plan	Stage of PfSH SOCG/Spatial Position Statement
Launch Consultation, July 2018	Not started
Strategic Issues and Priorities Consultation, February 2021	First SOCG agreed by PfSH September 2020 (10,750 ‘shortfall’), SDOA assessments starting
Draft (Regulation 18) Local Plan Consultation, November 2022	SOCG revision and update agreed October 2021 (12,896 ‘shortfall’), SDOA assessments underway

Proposed Submission (Regulation 19) Local Plan Consultation, August 2024	Spatial Position Statement agreed December 2023 (11,771 'shortfall') including strategy for addressing housing needs
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4.9. Table 2 above shows that the housing 'shortfall' has varied each time it is assessed, as it depends on the Standard Method requirements and housing supply at the time. During the period when the Strategic Issues and Priorities (SIP) document was being prepared for consultation, the first PfSH SOCG was published (September 2020), indicating a 'shortfall' of 10,750 dwellings. At this stage the potential 'Strategic Development Opportunity Areas' (SDOAs) were seen as the method by which the shortfall would be addressed and initial work was focused on assessing potential strategic-scale development areas. Work on a new Joint Strategy (subsequently known as the Spatial Position Statement) was at a very early stage and, whilst a shortfall was identified, it was expected that this would be addressed through SDOAs. These had not been assessed at this stage, so no sites or housing requirements were allocated to individual authorities.

4.10. This position was reflected in the SIP consultation document, which was based on the Standard Method requirement for the District, with all the housing growth options using a rounded annual requirement of 700 dwellings per annum (based on the Standard Method figure at the time of 692 dwellings per annum). The Government had confirmed that the Standard Method would continue for emerging local plans, following earlier consultation on alternatives. It was a requirement of the NPPF at the time (2019 NPPF, paragraph 60) that local plans should use the Standard Method unless exceptional circumstances justified an alternative, also taking account of unmet needs from neighbouring areas. Table H1 of the Proposed Submission Local Plan (page 215) shows that the annual requirement of 700 dwellings per annum used in the SIP is higher than the Standard Method figure for any year of the Plan so far, except 2022/23. Additionally, the SIP addressed the potential for higher housing requirements by explaining that there was potentially scope to deliver a higher housing requirement (whether to meet changes to the Standard Method or unmet needs) within any of the 4 development options, as follows:

“The Government may change the Standard Methodology in future, so there is some uncertainty about the Local Plan’s housing requirements. The alternative growth options discussed below could be revised to deliver a higher housing requirement, if this were imposed. While a strategy of promoting large growth areas may seem to be a way of delivering higher housing numbers, such areas could only achieve a certain number of completions in the Local Plan period. A higher housing requirement would need more sites to be allocated and this could potentially be achieved under any of the four alternative growth options.” (SIP document, pages 37/38)

4.11. In addition, the needs of neighbouring areas were specifically acknowledged, with references made to work on the PfSH Joint Strategy:

“The housing requirement relates to the whole of Winchester District, including the part within the South Downs National Park, but we are not able to allocate any land for development within the 40% the district which lies in the National Park. The alternative approaches do not include any allowance to meet the needs of neighbouring authorities that may not be able to meet their housing needs in full. These authorities are likely to be in South Hampshire, where the Partnership for South Hampshire is working to develop a Joint Strategy to plan for development needs at a sub-regional level – see approach 3 for more information.” (SIP document, page 38).

4.12. As work on the PfSH shortfall and the identification of SDOAs was at a very early stage, it would have been misleading, and total guesswork, for the SIP to consult on options for additional housing to address unmet needs. These would not have constituted ‘reasonable alternatives’ at this stage and, instead, the SIP document highlighted the work being undertaken by PfSH and that these needs would be considered through future stages of the Local Plan:

“The Partnership for South Hampshire (PfSH) is assessing a series of ‘Strategic Development Opportunity Areas’ across its area, which includes the southern part of Winchester District. These would meet the needs of the wider PfSH area and the results of this work will be considered under the ‘Duty to Cooperate’ and be taken forward as necessary through the next stages of the Local Plan process. Major development would not be appropriate in the National Park part of the district, so the only other area which could be considered as a potential location for a strategic scale site is the central/northern part of the district.” (SIP document, page 46).

4.13. Hence the SIP consultation document (consulted on in early 2021) went as far as it reasonably could in terms of acknowledging the likely unmet needs of the PfSH area (and the SDNP) and the work being undertaken to plan for them. It was believed at the time of consulting on the SIP that these needs would be addressed through SDOAs, one or more of which could potentially be within the south of the District. The SIP referred to this and committed to considering the outcome in future stages of the Local Plan, but there were no justified or evidence-based options that could have been used to consult on additional provision for unmet needs, or of their impact on the 4 spatial approaches. To attempt to consult on options for different scales of development at this stage would not have constituted ‘reasonable alternatives’ and could not have been assessed in the IIA, and the Integrated Impact Assessment (IIA) of the SIP reflected this.

- 4.14. Following consultation on the SIP and development of further evidence and the IIA, a 'hybrid' approach (1a) was evolved and this formed the basis of the Draft (Regulation 18) Local Plan which was published for consultation in November 2022. During the development of the Draft Local Plan an updated PfSH SOCG was agreed in October 2021. This continued to expect shortfalls to be addressed by new SDOAs and updated the position on the assessment of potential SDOAs, which remained at an early stage at that time. There was no indication of which potential SDOAs may be selected or which authorities they may fall within.
- 4.15. It was, however, becoming clear that new SDOAs may not be able to address all of the unmet need, as had previously been thought, and that the assessment of potential SDOAs would not be concluded in time to allocate any within the Winchester Local Plan. To allocate any potential SDOA in the emerging Local Plan would have involved substantially delaying progress on the Local Plan. It would have involved pausing work on the Strategic Transport Assessment (which by the time the work on the SDOAs had sufficiently progressed was well underway). The Sustainability Appraisal would have had to assess reasonable alternatives, and work would have to be undertaken to define a development area, undertake at least initial masterplanning and initial consultation, updating relevant evidence studies (e.g. transport modelling), drafting a site allocation policy and consulting on it.
- 4.16. The December 2022 update to the PfSH SOCG alluded to SDOAs not meeting shortfalls fully and indicated that PfSH officers were looking at potential additional and alternative ways of accommodating the shortfall. It also referred to the approach taken by Fareham Borough Council of providing an allowance for the expected unmet needs of Portsmouth. It was clear that waiting for the SDOA assessments to be concluded and attempting to allocate any in the Winchester Local Plan would involve a substantial delay, which would impact on the implementation of other development allocations and Local Plan policies. Therefore, it was concluded that it would not be possible to allocate any new SDOAs that may result from the PfSH work within the emerging Local Plan, given the need for substantial additional evidence gathering, testing of alternatives, and consultation.
- 4.17. However, Winchester recognised that it must consider how it could help address the unmet needs, even though at this stage their scale had not been finalised or the likely potential of SDOAs clarified. Therefore, Winchester took a proactive role in addressing this situation through the inclusion of a 'buffer' within the housing requirement of the Regulation 18 Local Plan. This reflected the conclusion of the SIP that the spatial approaches could potentially accommodate more than the 700 dwellings per annum consulted on at the time, with the 'buffer' of 1,450 dwellings reflecting the increased capacity of the preferred approach (1a).

4.18. It was not until late 2023 that the PfSH Spatial Position Statement was agreed, setting out the scale of the ‘shortfall’ at the time (albeit still only a snapshot in time) and a two-stage approach to meeting unmet needs. In the short to medium term 5 authorities, including Winchester, were expected to meet and potentially exceed their Standard Method 2023 requirement (stage 1, Spatial Position Statement, paragraph 6.33). In the longer term, policy SPS8 identified 7 ‘Broad Areas of Search for Growth’, including at East of Botley within Winchester, to deliver about 9,700 dwellings in total by 2036, with likely scope for additional development thereafter (stage 2, Spatial Position Statement, SPS8 and paragraphs 6.34-6.35).

4.19. Winchester was instrumental in promoting the two-stage approach for inclusion in the Spatial Position Statement (SPS), mindful of the need for the current round of emerging local plans to include short-medium term action to help address shortfalls. It was clear that even though the SPS identified the location of the SDOAs (now ‘Broad Areas of Search for Growth’), these could only become firm and detailed allocations if they were included in local plans which, as noted above, would take some time.

4.20. In Winchester’s case, the description of ‘East of Botley’ could potentially cover multiple SHELAA sites which currently have no overall coordination or masterplan and it would be impossible to work these up into a Local Plan allocation without substantially delaying the whole of the Local Plan/other pieces of the evidence base such as the Strategic Transport Assessment. Hence the Regulation 19 Local Plan refers to the SPS and its approach at paragraphs 9.15-9.17 and indicates that the necessary work will be progressed either through a specific development plan document or a review of the Local Plan. In practice, this is now likely to be overtaken by the need for an early review after the Plan is adopted, in accordance with NPPF 2024, paragraph 236.

4.21. Given that the Winchester Local Plan is to be examined under the provisions of the 2023 NPPF and the Standard Method was fixed on submission of the Plan, it is entirely legitimate for it to follow the approach promoted by the PfSH Spatial Position Statement. This has been arrived at following extensive joint working and funding by the PfSH authorities. The level of unmet need identified by the SPS strategy is capable of being met through a mix of provision in emerging local plans and new ‘Broad Areas of Search for Growth’, as follows:

Table 3. PfSH Unmet Needs

PfSH Spatial Position Statement Proposal	Commentary
Stage 1: 5 x authorities to meet/exceed their housing needs:	The emerging local plans below could potentially provide about 3,955 additional dwellings not

	previously accounted for (E Hants 640, Test Valley 1,415, Winchester 1,900):
East Hampshire	Draft Reg 18 Local Plan (Jan 2024) included a 'buffer' of about 640 dwellings (not specifically allocated to unmet needs).
Eastleigh	Local Plan adopted 2022, already counted in shortfall. Starting review.
Fareham	Local Plan adopted 2023, includes 900 dwellings to meet PfSH unmet need (800 allocated to Portsmouth). Already counted in supply.
Test Valley	Draft Reg 18 Local Plan Stage 2 (Feb 2024) included housing supply of about 1,415 dwellings above the requirement (not specifically allocated to unmet needs).
Winchester	Proposed Submission Reg 19 Local Plan includes an 'unmet needs allowance' of 1,900 dwellings, specifically for unmet housing needs.
Stage 2, SPS8: 7 x Broad Areas of Search for Growth.	To be planned for the longer term, totalling about 9,700 dwellings.
Total Potential Provision:	About 3,995 dwellings through stage 1 + about 9,700 dwellings through stage 2 = 13,655, compared to a 'shortfall' of 11,771 dwellings.

4.22. The table above illustrates that, in accordance with the provisions of the 2023 NPPF, the PfSH Spatial Position Statement's strategy could accommodate the 'shortfall' it identifies. It also shows that Winchester's Local Plan is providing by far the largest contribution of any existing/emerging Plan and is the only one that defines provision specifically for the PfSH area (other than the adopted Fareham Local Plan). It is noted that the PfSH strategy only covers the period to 2036, but the figures above provide some flexibility and the SPS notes that the Broad Areas of Search for Growth would be likely to deliver additional dwellings beyond 2036. However, in practice, future local plans are likely to need to plan for higher levels of development under the revised NPPF, which will require further cooperation between the planning authorities.

Updates to Statements of Common Ground / Local Plan

4.23. There has been ongoing engagement with all the neighbouring Local Planning Authorities throughout the preparation and different stages of the Local Plan. The City Council has agreed recent Statements of Common Ground (SOCGs) with all its neighbouring authorities, which were published in August 2024. This process has confirmed that only two authorities have indicated that they are unable to meet their housing needs in full, Portsmouth City Council and Havant Borough Council. Following the publication of the Regulation 19 Local Plan the City Council has continued discussions with both authorities and this has resulted in updated SOCGs and proposed modifications to the Local Plan.

4.24. During the preparation of the SOCGs with Portsmouth and Havant, both authorities suggested that Winchester's Local Plan should specify how much of its unmet needs allowance was intended for each authority and/or that the Plan should nominate sites that were addressing the unmet needs. Some respondents suggest that this demonstrates that the Council has failed to meet the Duty to Cooperate and/or satisfy the NPPF tests of soundness/legal compliance. The Council does not accept these allegations but, in any event, has been working with Portsmouth and Havant Borough Councils during the Regulation 19 consultation period to arrive at an updated agreed position.

4.25. As a result, updated SOCGs have been agreed with both authorities. In both cases, the key updates relate only to the 'Housing' element of each SOCG, in particular the 'Agreed Position'. It has been agreed that, as Portsmouth and Havant are the only authorities that have asked for assistance from Winchester to meet their unmet needs, the whole of the Local Plan's 'unmet needs allowance' should be apportioned to these authorities.

4.26. Portsmouth and Havant have discussed the split between each authority and have agreed the following:

The (current) unmet need of Portsmouth CC is 4,377 (over a 20 year plan period). The (current) unmet need of Havant BC is 4,309 (over a 20 year plan period). PCC's unmet need makes up 50.4% of total unmet need and HBC's unmet need makes up 49.6%.

Winchester has offered 1,900 'DtC' homes to adjoining authorities. PCC has already been allocated 800 'DtC' homes from Fareham BC. There are therefore 2,700 'DtC' homes available in adjoining authorities (to PCC and/or HBC). Approximately, 50.4% of 2,700 is 1,360; 49.6% of 2,700 is 1,340. As PCC has already been allocated 800 homes from Fareham, and Fareham and Havant are not adjoining, the distribution of DtC homes therefore would be:

To PCC: 800 from Fareham, and 560 from Winchester = 1,360

To HBC: 1,340 from Winchester = 1,340

4.27. Winchester agrees that the above split represents a reasonable approach and that it is primarily for Portsmouth and Havant to decide on the apportionment of the available 'DtC' homes. Winchester is, however, concerned about specifying the number of dwellings apportioned to each authority, as this is likely to change as housing numbers are updated and potentially change through the Local Plan examination. Accordingly, Winchester suggested that a percentage split would be more appropriate, namely 30% (Portsmouth) / 70% (Havant). This has been agreed, subject to a statement of the implications using the Regulation 19 Local Plan unmet needs allowance of 1,900 dwellings.

4.28. Both SOCGs have now been updated ([Portsmouth SOCG, October 2024](#) and [Havant SOCG, October 2024](#)) and include similarly worded 'Agreed Positions', with the Havant SOCG including slightly more full wording in places. The key points contained in both SOCGs are:

- Agreement that the Winchester District Local Plan would meet the 'positively prepared' and 'effective' tests of soundness if the unmet need allowance is specifically apportioned to individual local authorities;
- Agreement of the following apportionment, based on the current unmet need allowance for housing in the Regulation 19 Local Plan (Table H2):
 - To Portsmouth City Council: 30% apportionment of the unmet need housing allowance in the Winchester District Local Plan*
 - To Havant Borough Council: 70% apportionment of the unmet need housing allowance in the Winchester District Local Plan*
- Agreement this apportionment would represent a sound approach, considering the requests from Havant/Portsmouth to accommodate unmet housing need, and would be representative of the total unmet need between the two authorities, taking account of the inclusion of an 800 home allowance in the Fareham Local Plan;
- Agreement to work collaboratively with Portsmouth/Havant on modifications to propose alongside the submission of the Winchester District Local Plan which would put in place the framework above;
- Agreement that the above will be subject to change in the event that:
 - an additional ask is made of Winchester regarding any unmet need;
 - the housing target and/or unmet need allowance in the Winchester District Local Plan changes in the course of its examination;
- Agreement that the specific number of homes to be assigned to unmet need in Portsmouth and Havant could be subject to multiple changes through the examination and hence it is expressed as a percentage of the total unmet need allowance;
- Agreement that, by the conclusion of the examination, it will be necessary for Table H2 (or elsewhere) to set out accommodation of unmet need in Portsmouth and Havant as an explicit number of homes to follow the same approach as the recently adopted Fareham Local Plan;
- Agreement that there are no remaining areas of disagreement regarding this matter in relation to the Winchester District Local Plan, on the basis that it is submitted under the Transitional Arrangements set out by Government in August 2024.

* Based on the unmet need allowance of 1,900 homes set out in Table H2 in the Proposed Submission Plan, this would equate to 570 homes for Portsmouth City and 1,330 homes for Havant Borough.

4.29. The updated SOCGs note that the authorities would work together on modifications to propose alongside submission of the Local Plan for consideration by the Inspector. This has resulted in the inclusion of the following

proposed change to Table 2 (page 216) of the Local Plan in the 'Schedule of Proposed Modifications' (PM60, November 2024):

Add footnote to unmet needs allowance figure of 1,900 (**) as follows:

**** It has been agreed that to reflect the total unmet need in the housing market area would necessitate the following;*

- To Portsmouth City Council: 30% apportionment of the unmet need housing allowance in the Winchester District Local Plan;*
- To Havant Borough Council: 70% apportionment of the unmet need housing allowance in the Winchester District Local Plan.*

(based upon the unmet need allowance of 1,900 homes, this would equate to 570 homes for Portsmouth City and 1,330 homes for Havant Borough).“

4.30. This proposed modification relates to the 'unmet needs allowance' of 1,900 dwellings included in the Proposed Submission Local Plan. The SOCGs acknowledge that it may need to change if other authorities ask for assistance in meeting unmet needs or if the housing figures in the Local Plan change. Once these matters are finalised, prior to adoption of the Local Plan, the City Council is happy for Table 2 to refer to specific numbers of dwellings being apportioned to the authorities concerned.

4.31. The only matter that remains 'disagreed' between the authorities is the Portsmouth SOCG request that specific sites are identified in the Winchester Local Plan to meet its unmet needs. Winchester and Portsmouth have received varying advice on this matter from Planning Inspectorate advisory visits, but Winchester remains of the view that it is not necessary or appropriate. Allocating specific sites to the unmet needs of particular authorities would make no difference in terms of the policy requirements for the sites involved, nor for their occupiers. It would, however, be likely to lead to considerable political resistance and local resentment towards a site allocation being imposed to meet 'outside' needs. There is no suggestion that the Local Plan is unsound in this respect and therefore no need to address this issue any further.

South Downs National Park Unmet Needs

4.32. The [South Downs NP SOCG, August 2024](#) records that there is currently uncertainty over the scale of housing development expected within the SDNP part of Winchester District, due to the early stage of the South Downs Local Plan review. WCC estimates that this may be about 350 dwellings (2020-2040) whereas the SDNPA currently estimates it may be about 250 dwellings. This position is reflected in the representation by the SDNP Authority on the Proposed Submission Local Plan.

4.33. This is not an area of disagreement between the authorities, merely an uncertainty given the different Local Plan timescales. It is flagged up only

because the area of uncertainty (100 dwellings difference between Winchester's estimate of likely provision in the SDNP and the National Park Authority's) could result in a future request for Winchester to contribute up to 100 dwellings from the 'unmet needs allowance'. However, at this stage there is no disagreement, nor any request from the SDNP to use part of the unmet needs allowance.

4.34. The SOCG and the SDNP Authority's representation make clear that both WCC and SDNPA will work together to seek to meet the housing needs of the area, that WCC's approach towards providing an 'unmet needs allowance' is supported by SDNPA and that part of this could be used if necessary to resolve potential shortfalls in the SDNP part of Winchester District.

Conclusion

4.35. The above update regarding unmet housing needs clarifies that there are no outstanding issues between Winchester and any of its neighbours that go to the soundness or legal compliance of the Local Plan. The City Council is, therefore, satisfied that those representations that claim that the DtC has not been satisfied or the Plan is not sound are not well-founded. With regard to the DtC, the [Duty to Cooperate Statement of Compliance, Sept 2024](#) clearly demonstrates that the necessary requirements have been met.

4.36. In terms of the tests of soundness, in relation to unmet needs these require:

- **Positively prepared** – *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;...*
- c) **...Effective** – *deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;...*

4.37. There are now 'agreements with other authorities' in relation to every neighbour that has asked for assistance in meeting its unmet needs, 'as evidenced by the statement of common ground'. There is a wider strategy in place through the PfSH Spatial Position Statement and no neighbouring authorities suggest the Plan fails to meet the DtC or tests of soundness, showing that there has been 'effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred'. It is clearly not solely Winchester's responsibility to meet all unmet needs arising in PfSH through its Local Plan simply because it is one of the first to be progressed, but it is clear that 'unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development'.

4.39. The tests of soundness in relation to unmet housing needs are, therefore, fully satisfied and this is confirmed by all neighbouring authorities and the respective SOCGs.

5. Housing Supply Update to April 2024 / Housing Trajectory

- 5.1. The Proposed Submission (Regulation 19) Local Plan used housing figures that had a base date of April 2023. It is now possible to update this to an April 2024 base date and to produce new housing supply figures as a result. The following sections focus on the sources of supply to meet the Local Plan area housing requirement set out in policy H1. This excludes the SDNP part of the District where the Local Plan estimates that 350 dwellings will be delivered, as these are not in the City Council's direct control, nor in this Local Plan area.
- 5.2. The Local Plan Housing Trajectory at Appendix A sets out in detail the various categories of housing supply that are used and how these contribute year by year during the Local Plan period. The headings below correlate with the Housing Trajectory headings (Appendix A).

A. Completions since the start of the Local Plan period

- 5.3. The use of past completions and the start date of the Local Plan are discussed and fully justified in Chapter 3 above. These can now be updated to 2024 by adding completions of 993 dwellings (excluding the SDNP part of the District) in 2023/24. Total completions in the Local Plan area (excluding SDNP) since the start of the Plan period (2020-2024) are therefore **4,132**. Details of all the sites involved are contained in the Council's Authorities Monitoring Report 2024 (Appendix 3.2) and previous AMRs since 2020.

B. Small Sites with Planning Permission

- 5.4. There were a total number of **305** dwellings with outstanding planning permission on small sites at 1 April 2024 (excluding the SDNP area and communal dwellings). For small sites, the NPPF advises that *'sites which do not involve major development and have planning permission... should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years'* (NPPF Annex 2). Therefore, the Housing Trajectory (Appendix A) estimates that all small sites with consent will be delivered over the coming 5 years (from 2024/25 to 2028/29) with the number of completions spread evenly over the 5 years.

C. Large Sites with Full Planning Permission

- 5.5. The Housing Trajectory (Appendix A) lists outstanding planning permissions at April 2024 on large sites (10 or more dwellings), excluding those that are allocated by the Local Plan, totalling **336** dwellings. The remaining capacity of each site and the expected timing of delivery is included. The NPPF (Annex 2)

advises that *'all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years'*. Development is underway on most of these sites (with some nearly complete) and all except one site are expected to be completed within 5 years from 2024.

- 5.6. In updating information on sites with planning consent (commitments) it has been identified that the Proposed Submission Local Plan's Table H2 (page 216) contained an error in relation to the total 'outstanding planning permissions' figure of 6,780 dwellings. This mistakenly related to the gross number of dwellings committed, not the net gain. This error has been corrected in updating the figures for planning consents to an April 2024 base date.

D. Existing Local Plan Allocations with Full Planning Permission

- 5.7. The Housing Trajectory (Appendix A) lists existing Local Plan (Part 2) Allocations with Full Planning Permission at April 2024, totalling **502** dwellings. These sites are all carried forward into the Proposed Submission Local Plan and the relevant policy number is shown, along with the remaining capacity of each site (acknowledging that some sites are partially completed) and their expected phasing. The NPPF (Annex 2) advises that *'all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years'*. Development is underway on some of these sites, but some are expected to take up to 8 years from 2024 to complete as they are either large sites (e.g. Sun Lane, Alresford) or have only recently been permitted (e.g. Morgan's Yard, Waltham Chase).

E. Existing Local Plan Strategic Allocations

- 5.8. The Housing Trajectory (Appendix A) lists three existing Local Plan Strategic Allocations, at Barton Farm, Winchester; Newlands, West of Waterlooville; and North Whiteley, Whiteley. All these sites have masterplans and outline consents covering the whole site, with numerous reserved matters applications in place to enable ongoing development. Development of all the sites is well underway, with a total of **4,613** dwellings expected on these sites during the Local Plan period. These sites are all carried forward into the Proposed Submission Local Plan and additional capacity is identified at Newlands and North Whiteley (not included in the figure above). The relevant Local Plan policy number is shown, along with the remaining capacity of each site (acknowledging that all sites are partially completed) and their expected phasing.
- 5.9. The NPPF (Annex 2) advises that *'where a site has outline planning permission for major development... it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years'*. Development is now well underway on all the strategic sites and they are all in

the control of major housebuilders or developers. They have various reserved matters consents in place, are actively being brought forward and developed and at no stage has there been any pause or halt to their development. In all cases the sites are served by multiple access points, allowing several phases to be brought forward and marketed consecutively, normally with several major national housebuilders active on each site at any one time.

5.10. Each strategic site has provided considerable infrastructure, often in advance of development, including:

- Major works to access each site, including substantial off-site improvements / financial contributions, as well as laying out the main on-site road network at an early stage to serve future phases;
- Major education provision including providing land and funding for new primary schools at each strategic site, all of which are now provided and operating, with further schools to be developed at North Whiteley;
- Major sustainable drainage and flood alleviation works at all sites, including sustainable drainage infrastructure (swales, balancing ponds, etc), off-site improvements and flood prevention measures for the sites as a whole;
- Major green infrastructure and open space provision including large areas of strategic greenspace at every site and provision for biodiversity and nutrient neutrality;
- Provision of community facilities and infrastructure, including local centres either provided or planned at each site.

5.11. There is, therefore, *'clear evidence that housing completions will begin on site within five years'* on all of the strategic sites. In fact, it is already well underway, with reserved matters consents for future phases, and there is no reason why this should not continue. Given the size of these sites and the amount of development remaining, the housing trajectory estimates that they will be completed between 2031 (North Whiteley) and 2037 (Barton Farm).

F. Large Sites with Outline Planning Permission

5.12. There are no unallocated large sites that have only outline permission, so 0 completions are estimated for this source.

G. Communal Planning Permissions

5.13. Housing supply from communal accommodation should be taken into account, as advised in Planning Practice Guidance (PPG paragraph 034 Reference ID: 68-034-20190722 and paragraph 035 Reference ID: 68-035-20190722). Appendix 3.5 of the Council's Authorities Monitoring Report sets out the details of the schemes involved (2 student and 4 older persons' schemes) and adjusts the number of bedspaces involved by the relevant ratio. For student

accommodation a ratio of 2.5 bedspaces to 1 dwelling equivalent is applied and for older persons' housing it is 1.8 bedspaces per dwelling equivalent. These are as advised in the PPG above and the 'Housing Delivery Test Measurement Rule Book' 2018¹. A net total of **71** dwelling equivalents are expected and these are all phased within 5 years from 2024 as they all have consent.

H. Local Plan 2040 Allocations

5.14. This section lists all the sites allocated by the Local Plan 2040 which do not have planning consent (as of 1 April 2024), totalling **3,444** dwellings. Sites that have consent are discussed above under the 'D. Existing Local Plan Allocations with Full Planning Permission' heading. This category includes sites carried forward from the existing Local Plan and new sites allocated in the Local Plan 2040. New/enlarged site allocations remain at 2,875 dwellings, as indicated in the Proposed Submission Local Plan (Table H2 and Policy H3).

5.15. The phasing applied to these sites reflects the provisions of policy H2, which seeks to hold back consents for new greenfield allocations until 2030. Therefore, it is assumed that these sites will start to deliver completions from 2031/32 onwards. This results in a slight peak of completions in 2031/32 and subsequent years, although in practice market conditions are likely to lead to this being more spread out.

5.16. Only a small number of sites are expected to contribute completions within the 5 years from 2024. These are mainly those which are subject to current planning applications or have gained planning consent (e.g. Ravenswood, Knowle and The Dean, Alresford), or where landowners / developers are bringing forward proposals (e.g. Bar End Depot, Winchester, Whiteley Green, Whiteley). All sites are expected to be fully built-out within the Local Plan period.

I. Other Existing Allocations

5.17. This category relates to two small site allocations in the Denmead Neighbourhood Plan (2015), which have yet to be developed. These amount to a net total of **28** dwellings.

J. Windfall development

5.18. The [Windfall Assessment Report 2021](#) concludes that a cautious estimate of 115 dwellings per annum would be appropriate for windfall provision in the Local Plan area (excluding the South Downs National Park). The Proposed

¹ Minor changes were made to the 'Housing Delivery Test Measurement Rule Book' in December 2024 alongside the publication of the updated NPPF, changing the ratios slightly to 2.4:1 (student households) and 1.9:1 (other communal). These changes would make minimal difference to the housing supply going forward and are related to the updated NPPF, not the December 2023 NPPF against which the Plan is being examined. Hence, they have not been taken into account in the housing supply figures used in the Topic Paper Update.

Submission (Regulation 19) Local Plan included a District-wide allowance of 1,895 dwellings for windfall development, of which 1,725 would be within the Local Plan area (115 x 20 years = 1,725).

5.19. In order to avoid double counting with sites already permitted, no allowance is made for windfall sites for 2 years following the base date, consistent with the approach in the Council's AMR. This means that if the base date is updated to April 2024 the windfall allowance should start from April 2026 (2026/27 onwards) and this phasing is reflected in the trajectory. This leaves 14 years to the end of the Local Plan period, so the windfall allowance now totals **1,610** dwellings (115 dwellings x 14 years = 1,610).

5.20. While some representations question the scale of the windfall allowance, this issue is addressed in the original Housing Topic Paper (July 2024). The Windfall Study is a detailed assessment which provides the '*compelling evidence*' required by the 2023 NPPF (paragraph 71), as well as being modest in its assumptions.

Conclusion: Local Plan Housing Provision

5.21. Table 4 below draws together the various sources of housing provision discussed above and illustrated in the housing trajectory to produce an updated picture of Local Plan housing supply.

Table 4: Updated Local Plan Housing Provision

Winchester Local Plan Housing Provision	
Source (from Housing Trajectory)	Dwellings
Completions since start of Local Plan period (2020-2024)	4,132
Small Sites with Planning Permission	305
Large Sites with Full Planning Permission	336
Existing Local Plan Allocations (with Planning Perm)	502
Existing Local Plan Strategic Allocations	4,613
Large Sites with Outline Planning Permission	0
Communal Planning Permissions	71
Local Plan 2040 Allocations	3,444
Other Existing Allocations	28
Windfall development	1,610
Updated Local Plan Housing Provision	15,041
Local Plan Housing Requirement (Policy H1)	15,115

5.22. It can be seen that the updated housing supply is slightly less than the housing requirement set by the Proposed Submission Local Plan Policy H1 (15,115 dwellings). As noted above (paragraph 5.6) the Proposed Submission

Local Plan erroneously included the gross number of dwellings (rather than net) from outstanding commitments in its Table H2. This inflated the total provision (by 79 dwellings), which then informed the Local Plan housing requirement in policy H1 (15,115 dwellings). About 75% of the reduction in net dwelling supply is in the Market Towns and Rural Area spatial area, with most of the remainder in Winchester Town.

5.23. Correcting this error reduces housing supply (by 79 dwellings) and this has been compounded by the loss of one year's windfall provision (115 dwellings). New planning consents have recovered much of this shortfall but there remains a difference of 74 dwellings between the Local Plan Policy H1 requirement (15,115) and the updated supply (15,041). The Housing Trajectory shows that housing completions remain at a level above the annual requirement in all years up to 2034/35, so in practice any shortfall would not occur until the end of the Plan period. The Council also considers that it has taken a cautious approach to some site capacities and windfall provision, which is likely to more than make up for any shortfall.

5.24. However, as the Council cannot fully evidence an increase in housing supply at this stage, it is promoting a **proposed modification to reduce the Policy H1 housing requirement to 15,040 dwellings**. This will have a knock-on effect on other parts of the Local Plan such as Table H2 and policy H3, but modifications are not proposed at this stage until the housing numbers are finalised following the examination.

6. Local Plan 5-Year Land Supply / Phasing

5-Year Housing Land Supply

- 6.1. The Local Plan is being progressed on the basis of the transitional arrangements contained in the December 2024 NPPF, specifically paragraph 243b. This provides that the Plan '*will be examined under the relevant previous version of the Framework*', which is the December 2023 NPPF. Accordingly, when assessing the 5-year land supply of the Local Plan it is the requirements of the December 2023 NPPF that should be applied. These only require a buffer (of 20%) to be applied '*where there has been significant under delivery of housing over the previous three years*' (Dec 2023 NPPF paragraph 77). The Council's AMR demonstrates that there has not been any under-delivery of housing over recent years, in fact quite the opposite.
- 6.2. The detailed Local Plan trajectory is shown at Appendix A, with the land supply information explained in section 5 above. The housing trajectory is used to determine the relevant housing supply, taking account of the phasing of sites affected by the provisions of policy H2.
- 6.3. Reflecting the requirements of the December 2023 NPPF, Table 5 below sets out the 5-year land supply situation for the Local Plan with no buffers. The Planning Practice Guidance advises that '*in plan-making, strategic policies should identify a 5 year housing land supply from the intended date of adoption of the plan*' (Housing Supply and Delivery PPG, paragraph 004). Therefore, Table 5 below includes sites which the housing trajectory expects to be completed from 2025-2030. Appendix B also illustrates housing land supply for the whole Local Plan period to produce a 'rolling' 5-year land supply (updating Appendix 5 of the July 2024 Housing Topic Paper).

Table 5: Local Plan 5 Year Land Supply 2025-2030 ('Liverpool' Method)

Housing Requirement		
a	Local Plan housing requirement (modified)	15,040
b	Completions to Apr 2025 (Table 4 above plus trajectory completions 2024/25 [4,132 + 722 = 4,854])	4,854
c	Remaining Local Plan requirement (a – b)	10,186
d	Remaining years of Plan (2024-2040)	15 years
e	Annual requirement (c / d)	679

f	5-year requirement 2025-2030 (e x 5)	3,395
Housing Supply		
g	5-Year Supply (housing trajectory 2025-2030)	4,562
Resulting Land Availability		
h	Years of land supply (g / e)	6.7 years

6.4. The dwellings included within the 5-year supply (housing trajectory years 2025/26 - 2029/30) clearly fall within the NPPF definition of ‘deliverable’ (NPPF Annex 2):

- **Small sites with planning permission:** these ‘do not involve major development and have planning permission’ (NPPF Annex 2);
- **Large sites with full planning permission:** these are ‘with detailed planning permission’ (NPPF Annex 2);
- **Existing Local Plan allocations with full planning permission:** these are ‘with detailed planning permission’ (NPPF Annex 2);
- **Existing Local Plan Strategic Allocations:** see Chapter 5 above where ‘there is clear evidence that housing completions will begin on site within five years’ (NPPF Annex 2);
- **Communal Planning Permissions:** these are ‘with detailed planning permission’ (NPPF Annex 2);
- **Local Plan 2040 allocations:** the Local Plan examination is expected to confirm that ‘there is clear evidence that housing completions will begin on site within five years’ (NPPF Annex 2);
- **Other Existing Allocations:** the Local Plan examination and emerging Denmead Neighbourhood Plan review are expected to confirm that ‘there is clear evidence that housing completions will begin on site within five years’ (NPPF Annex 2);
- **Windfall sites** as there is ‘compelling evidence that they will provide a reliable source of supply’ (NPPF para 72) providing ‘clear evidence that housing completions will begin on site within five years’ (in years 3-5) (NPPF Annex 2).

6.5. Although Table 5 above sets out the Local Plan 5-year land supply position in accordance with the 2024 NPPF’s transitional arrangements and the current PPG, the Council recognises it will need to demonstrate ongoing housing land supply for the purposes of decision-making, in accordance with 2024 NPPF paragraph 78. While this is not something that need necessarily be tested through the Local Plan examination, the position is illustrated below to provide a complete picture.

6.6. The Local Plan 2040 is expected to be adopted in 2025 and will, therefore, be subject to the requirements of paragraph 78c of the NPPF 2024 from July 2026. The Local Plan housing requirement is less than 80% of the new local housing need figure, so the Council will be required to add a 20% buffer (instead of 5%) for land supply calculations after 1 July 2026. A calculation for the period 2025-2030 is included below to properly demonstrate the effect of a 20% buffer from 2026.

Table 6: 5 Year Land Supply 2025-2030 (for decision-making)

Housing Requirement		
a	Local Plan housing requirement (modified)	15,040
b	Completions to Apr 2025 (Table 4 above + trajectory year 2024/25)	4,854
c	Remaining Local Plan requirement (a – b)	10,186
d	Remaining years of Plan (2025-2040)	15 years
e	Annual requirement (c / d)	679
f	5% buffer 2025-2026 (e + 5%)	713
g	20% buffer 2026-2030 (e + 20%)	815
h	5-year requirement 2025-2030 (f x 1 + g x 4)	3,973
i	Average annual requirement with buffer (h / 5)	795
Housing Supply		
j	5-Year Supply (housing trajectory 2025-2030)	4,562
Resulting Land Availability		
k	Years of land supply (j / i)	5.7 years

6.7. It can be seen that there will still be over 5 years' housing land supply for decision making purposes on adoption of the Local Plan, even after NPPF 2024 paragraph 78c comes into effect. This comfortable level of land supply can be achieved even though various new site allocations are held back by Local Plan Policy H2. Policy H2 allows for sites to be released if necessary to overcome a housing land supply shortfall, but clearly this is not expected.

Effect of Phasing Policy (H2)

6.8. Appendix C provides an updated version of the table at page 218 of the Proposed Submission Local Plan, showing the effects of the phasing policy using the updated trajectory. This shows that, without the phasing policy,

completions would peak in 2028/29 and start to fall off thereafter. Annual completions would drop below 795 (the level needed to maintain a 5-year supply for decision-making purposes in Table 6 above) after 2031/32 and remain below 'with phasing' levels until 2036/37, when the lines converge.

- 6.9. Therefore, phasing Policy H2 is beneficial in terms of land supply, as previously held-back sites start delivering completions from 2031. Appendix B shows that this will maintain housing provision above 5 years + 20% (equivalent to 6 years' supply) until at least 2033/34. This will enable the Council to continue to demonstrate a 5-year supply in accordance with NPPF paragraph 78c, if necessary, until 2028/29 (5 years before 2033/34) by which time a revised Local Plan will be adopted.
- 6.10. This will enable the Local Plan to remain relevant and up-to-date for decision-making purposes for a period after its adoption, providing for an orderly transition to a new Local Plan by 2028/29 which will address the higher housing requirements of the new NPPF/Standard Method. In the 'without phasing' scenario the Council could have difficulty in demonstrating an adequate 5-year supply for decision-making purposes after 2026/27. This would not give time for a new Local Plan to be adopted, so could result in the type of non-plan-led development and 'planning by appeal' that the NPPF seeks to avoid.

Conclusion

- 6.11. Table 5 above shows that the Local Plan can achieve a 5-year supply of deliverable housing sites on adoption, following the transitional arrangements of the December 2024 NPPF and accompanying PPG. Appendix B illustrates the housing land supply situation over the Plan period as a whole and, like the versions at Appendix 5 of the July 2024 Housing Topic Paper, shows that a 5-year supply can be maintained until at least the final 5 years of the Local Plan period. By this time there will have been several Local Plan reviews which will ensure on-going housing provision.
- 6.12. Table 6 above confirms that the Council will also be able to demonstrate an adequate 5-year land supply for decision making purposes, on adoption of the Local Plan. This includes providing for the buffers that will be required by the 2024 NPPF, particularly after 1 July 2026. The housing trajectory and Appendix B show that the Council expects to maintain 5 years' + 20% provision (equivalent to 6 years) at least until 2028/29, by which time a new Local Plan will be in place, reflecting the requirements of NPPF paragraph 236.
- 6.13. The Local Plan's phasing policy (Policy H2) will help maintain at least 5-years' + 20% land supply over a longer period than the 'without phasing' situation. While not imposing phasing may lead to greater peaks of housing provision for a few years after adoption of the Plan, these would exceed what is needed to maintain an adequate housing land supply. Applying phasing will help maintain

an adequate land supply until at least 2028/29 by helping to raise post-2030 housing completions.

6.14. As well as making for more even housing delivery over most of the Plan period, and helping to address nutrient and infrastructure issues (see July 2024 Housing Topic Paper), this will give time for the Local Plan to be reviewed so as to provide the higher housing numbers required by the 2024 NPPF/Standard Method. Without phasing it may be possible to maintain an adequate 5-year + 20% land supply for only a short period after adoption of the Local Plan, creating a situation where there is a presumption in favour of permission (NPPF paragraph 11d) due to inadequate land supply, but no adopted replacement Plan. The result would be a risk of planning by appeal and development that is not properly planned or plan-led.

Appendix A: Local Plan Housing Trajectory

Site Name / Local Plan reference	Total Dwellings	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
A. Completions (including communal, excluding SDNP)																					
All sites (listed at AMR App 3.2)	4132	868	1193	1078	993																
Total	4132	868	1193	1078	993																
B. Small Sites with Planning Permission (less than 10 dwellings)																					
All small sites (listed at AMR Ap 3.3)	305					61	61	61	61	61	0	0	0	0	0	0	0	0	0	0	0
Total	305					61	61	61	61	61	0	0	0	0	0	0	0	0	0	0	0
C. Large Sites with Full Planning Permission (10 dwellings or more)																					
1-4 Woodpeckers Drive 20/01554/FUL	9					9															
Hampshire Constabulary HQ Romsey Road 17/03139/FUL	3					3															
11-11A The Old Gaol House Jewry Street 20/02288/FUL	15					15															
Fire Station North Walls 14/00227/FUL	1					1															
Moorside Winchester 22/01425/FUL	18						18														
14 Chesil Street Winchester 17/03096/FUL	13						5	8													
Sherecroft Farm Botley Hill 20/00494/FUL	115					20	50	45													
Abbey Mill Station Road 17/02075/FUL	69					20	30	19													
Malt Lane Bishops Waltham 21/00359/FUL	24						6	18													
Worthy Down South Wonston 15/02751/REM	30										30										
St. George's House St. George's Street 23/01955/PNRCOU	12						12														
Knowle Village 20/00372/FUL	1					1															

Site Name / Local Plan reference	Total Dwellings	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
Brymore House/Ocean House, Denmead 21/00397/PNCOU	26						26														
Total	336					69	147	90	0	0	30	0	0	0	0	0	0	0	0	0	0
D. Existing Local Plan Allocations with Full Planning Permission																					
NA1 The Dean 17/02306/FUL	20						20														
NA2 Sun Lane 21/01731/REM	302						20	40	50	50	50	50	42								
SW1 The Lakes (19/02421/FUL) (remaining)	83					30	30	4			19										
WC1 Morgan's Yard 21/02439/FUL	80								20	50	10										
WK1 East of Winchester Road 17/02615/FUL (remaining)	17					17															
Total	502					47	70	44	70	100	79	50	42	0	0	0	0	0	0	0	0
E. Existing Local Plan Strategic Allocations																					
W1 Barton Farm	1408					95	95	115	115	115	115	115	115	115	115	115	90	53	40		
SH1 Newlands (West of Waterlooville) (additional)	1129					100	120	120	120	120	120	120	100	100	75	34					
SH2 North Whiteley	2076					350	350	300	300	250	225	175	126								
Total	4613					545	565	535	535	485	460	410	341	215	190	149	90	53	40	0	0
F. Large Sites with Outline Planning Permission (not allocated)																					
None	0																				
Total	0																				
G. Communal Planning Permissions (dwelling equivalents)																					
Student accommodation (2 sites listed at AMR Appendix 3.5)	-11							1	-12												
Older persons' accommodation (4 sites listed at AMR Appendix 3.5)	82						11	37	34												
Total	71					0	11	38	22	0	0	0	0	0	0	0	0	0	0	0	0
H. Local Plan 2040 Allocations (without planning permission)																					
W2 Sir John Moore Barracks	900									40	50	100	110	110	110	110	110	110	50		

Site Name / Local Plan reference	Total Dwellings	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
W3 St Peters Car Park	30											10	20								
W4 Courtenay Road	150												20	50	50	30					
W7 Central Winchester Regeneration area	300										50	80	80	80	10						
W8 Station Approach area	250										35				40	40	35	50	50		
W9 Bar End Depot	30						10	20													
H9 Student Accomodation	200															50	100	50			
SH1 Newlands (West of Waterlooville) (additional)	300														100	50	50	50	50		
SH2 North Whiteley (additional)	200												50	50	50	50					
SH3 Whiteley Green	30								20	10											
BW3 Tollgate Sawmill	10										10										
BW4 Land North of Rareridge Lane	100												20	50	30						
NA1 The Dean (remaining)	14							14													
NA3 Alresford Neighbourhood Plan	100												30	30	20	10	10				
CC1 Clayfield Park	48								20	20	8										
CC2 Colden Common Farm	45													20	25						
CC3 Land at Main Road	35												10	25							
CC4 Land adjoining 85 Church Lane	10												5	5							
D1 Denmead Neighbourhood Plan	100												30	30	20	10	10				
KW1 Cornerways & Merrydale	45								10	20	15										
KW2 Land adjoining the Cart & Horses PH	75											20	30	25							
SW1 Land at The Lakes, Swanmore (remaining)	17									17											
WK5 Mill Lane	40												20	20							
WK6 Land off Southwick and School Road	60												20	20	20						
KN1 Ravenswood	200								50	100	30	20									

Site Name / Local Plan reference	Total Dwellings	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
OT1 Land off Main Road	55												20	35							
SWO1 Land at West Hill Road North	40												20	20							
SU01 Land at Brightlands, Sutton Scotney	60												20	20	20						
Total	3444					0	10	34	100	207	198	230	505	590	495	350	315	260	150	0	0
I. Other Existing Allocations (without planning permission)																					
Denmead NP Pol 2(ii) Land off Tanner's Lane Denmead	18								-2	10	10										
Denmead NP Pol 2 (iv) Land off Anmore Road	10								10												
Total	28					0	0	0	8	10	10	0	0	0	0	0	0	0	0	0	0
J. Windfall Allowance																					
Local Plan Area Windfall Allowance	1610							115	115	115	115	115	115	115	115	115	115	115	115	115	115
Total	1610					0	0	115	115	115	115	115	115	115	115	115	115	115	115	115	115
Annual Completions	15041	868	1193	1078	993	722	864	917	911	978	892	805	1003	920	800	614	520	428	305	115	115
Annual Housing Requirement (Modified)	15040	752	752	752	752	752	752	752	752	752	752	752	752	752	752	752	752	752	752	752	752
Cumulative Completions	15041	868	2061	2793	4132	4854	5718	6635	7546	8524	9416	10221	11224	12144	12944	13558	14078	14506	14811	14926	15041
Cumulative Housing Requirement	15040	752	1504	2256	3008	3760	4512	5264	6016	6768	7520	8272	9024	9776	10528	11280	12032	12784	13536	14288	15040
Dwellings Above / Below Cumulative Requirement	1	116	557	537	1124	1094	1206	1371	1530	1756	1896	1949	2200	2368	2416	2278	2046	1722	1275	638	1

Appendix B: 5 Year Land Supply Over The Local Plan Period

(Updating Appendix 5 of July 2024 Housing Topic Paper)

Sedgefield Method

Year	Projected Annual completions	Cumulative Completions	Annual requirement	Surplus shortfall	Cumulative surplus shortfall	5 year requirement	new annual requirement	Available 5 year supply	Years Supply
2020/21	868	868	752	116	116	3644	729	4854	6.7
2021/22	1193	2061	752	441	557	3203	641	4850	7.6
2022/23	1078	3139	752	326	883	2877	575	4574	7.9
2023/24	993	4132	752	241	1124	2636	527	4407	8.4
2024/25	722	4854	752	-30	1094	2666	533	4392	8.2
2025/26	864	5718	752	112	1206	2554	511	4562	8.9
2026/27	917	6635	752	165	1371	2389	478	4503	9.4
2027/28	911	7546	752	159	1530	2230	446	4589	10.3
2028/29	978	8524	752	226	1756	2004	401	4598	11.5
2029/30	892	9416	752	140	1896	1864	373	4420	11.9
2030/31	805	10221	752	53	1949	1811	362	4142	11.4
2031/32	1003	11224	752	251	2200	1560	312	3857	12.4
2032/33	920	12144	752	168	2368	1392	278	3282	11.8
2033/34	800	12944	752	48	2416	1344	269	2667	9.9
2034/35	614	13558	752	-138	2278	1482	296	1982	6.7
2035/36	520	14078	752	-232	2046	1714	343	1483	4.3
2036/37	428	14506	752	-324	1722	2038	408	963	2.4
2037/38	305	14811	752	-447	1275	2485	497	535	1.1
2038/39	115	14926	752	-637	638	3122	624	230	0.4
2039/40	115	15041	752	-637	1	3759	752	115	0.2

Liverpool Method

Year	Requirement	Projected Annual completions	Cumulative Completions	Remaining Annual requirement	5 year requirement	Available 5 year supply	Years Supply
2020/21	15040	868	868	752	3760	4854	6.5
2021/22	14172	1193	2061	746	3729	4850	6.5
2022/23	12979	1078	3139	721	3605	4574	6.3
2023/24	11901	993	4132	700	3500	4407	6.3
2024/25	10908	722	4854	682	3409	4392	6.4
2025/26	10186	864	5718	679	3395	4562	6.7
2026/27	9322	917	6635	666	3329	4503	6.8
2027/28	8405	911	7546	647	3233	4589	7.1
2028/29	7494	978	8524	625	3123	4598	7.4
2029/30	6516	892	9416	592	2962	4420	7.5
2030/31	5624	805	10221	562	2812	4142	7.4
2031/32	4819	1003	11224	535	2677	3857	7.2
2032/33	3816	920	12144	477	2385	3282	6.9
2033/34	2896	800	12944	414	2069	2667	6.4
2034/35	2096	614	13558	349	1747	1982	5.7
2035/36	1482	520	14078	296	1482	1483	5.0
2036/37	962	428	14506	241	962	963	4.0
2037/38	534	305	14811	178	534	535	3.0
2038/39	229	115	14926	115	229	230	2.0
2039/40	114	115	15041	114	114	115	1.0

Appendix C: Effect of Phasing on Housing Trajectory

(Updating Table at Page 218 of Proposed Submission Local Plan)

