

## Strategic Policy H1: Housing Provision

### Overview of Comments:

**Support - 186**

**Neither support or object - 30**

**Object – 51**

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

| <b>Comments which support H1 - housing provision</b>   |   |   |
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| <b>Respondent number</b>   | <b>Comment</b>  | <b>Officer Comment</b>  |
| ANON-KSAR-NKXG-9<br>ANON-KSAR-NK38-N<br>ANON-KSAR-NK3C-Z<br>ANON-KSAR-NKXP-J<br>ANON-KSAR-NK39-P<br>ANON-KSAR-NK3R-F<br>ANON-KSAR-NK34-H<br>ANON-KSAR-NK36-K<br>ANON-KSAR-NK3D-1<br>ANON-KSAR-NK3J-7<br>ANON-KSAR-NK3Q-E<br>ANON-KSAR-NK32-F<br>ANON-KSAR-NK3Y-P<br>ANON-KSAR-NK3H-5<br>ANON-KSAR-NK3U-J<br>ANON-KSAR-NK3M-A | <p>Support / strongly support / welcome the Council's decision to reject Approach 3 (strategic allocation / new settlements) and also the statement in Homes for All that this approach's promotion of large-scale greenfield development is at odds with the Council's priorities of maintaining the viability of existing centres, reducing travel and carbon emissions, and making best use of brownfield land. Urge the Council to maintain this position, despite the pressure from developers.</p> <p>Some comments raise additional objections to a potential new settlement at Micheldever Station including:</p> <ul style="list-style-type: none"> <li>- Loss of gap between Winchester and Basingstoke</li> <li>- Loss of countryside / agricultural land / food production</li> <li>- Risk of coalescence with Basingstoke / other settlements</li> <li>- Impact on / lack of infrastructure</li> <li>- Traffic / transport impact</li> </ul> | <p>Support welcomed and comments noted.</p> <p><b>Recommended response:</b> No change</p> |

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| ANON-KSAR-NK3G-4<br>ANON-KSAR-NK33-G<br>ANON-KSAR-NKVR-J<br>ANON-KSAR-NKV9-S<br>ANON-KSAR-NKVD-4<br>ANON-KSAR-NKV4-M<br>ANON-KSAR-NKVK-B<br>ANON-KSAR-NKVB-2<br>ANON-KSAR-NKVV-P<br>ANON-KSAR-NKVH-8<br>ANON-KSAR-NKVS-K<br>ANON-KSAR-NKVG-7<br>ANON-KSAR-NKVP-G<br>ANON-KSAR-NK98-U<br>ANON-KSAR-NK9C-6<br>ANON-KSAR-NK99-V<br>ANON-KSAR-NK96-S<br>ANON-KSAR-NK9K-E<br>ANON-KSAR-NK9T-Q<br>ANON-KSAR-NK91-M<br>ANON-KSAR-NK9J-D<br>ANON-KSAR-NK9Y-V<br>ANON-KSAR-NKWA-2<br>ANON-KSAR-NK9G-A<br>ANON-KSAR-NKW6-Q<br>ANON-KSAR-NKWZ-U<br>ANON-KSAR-NKWT-N<br>ANON-KSAR-NKWF-7<br>ANON-KSAR-NKW7-R<br>ANON-KSAR-NK8Z-V<br>ANON-KSAR-NK8K-D<br>ANON-KSAR-NK8T-P | <ul style="list-style-type: none"> <li>- No need for large-scale development</li> <li>- Impact on biodiversity / river Dever</li> <li>- Avoid greenfield development / support brownfield</li> <li>- Impact of increased water abstraction / foul water disposal</li> <li>- Development at Micheldever will not help unmet needs in PfSH</li> </ul> |  |
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| ANON-KSAR-NK8Q-K<br>ANON-KSAR-NK8V-R<br>ANON-KSAR-NK8S-N<br>ANON-KSAR-NKSA-X<br>ANON-KSAR-NKS6-K<br>ANON-KSAR-NKST-H<br>ANON-KSAR-NKSS-G<br>ANON-KSAR-NKSX-N<br>ANON-KSAR-NKSM-A<br>ANON-KSAR-NKSG-4<br>ANON-KSAR-NKT8-P<br>ANON-KSAR-NKTR-G<br>ANON-KSAR-NKTF-4<br>ANON-KSAR-NKR9-N<br>ANON-KSAR-NKR4-G<br>ANON-KSAR-NKRY-N<br>ANON-KSAR-NKR7-K<br>ANON-KSAR-NK7Q-J<br>ANON-KSAR-NK7S-M<br>ANON-KSAR-NK7P-H<br>ANON-KSAR-NKZ8-V<br>ANON-KSAR-NKZ1-N<br>ANON-KSAR-NKB8-4<br>ANON-KSAR-NKBZ-6<br>ANON-KSAR-NKBX-4<br>ANON-KSAR-NKBM-S<br>ANON-KSAR-NKK1-6<br>ANON-KSAR-NKK3-8<br>ANON-KSAR-NKCQ-X<br>ANON-KSAR-NKHX-A<br>ANON-KSAR-NKPN-8<br>ANON-KSAR-NK4D-2 |  |  |
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| ANON-KSAR-NK44-J<br>ANON-KSAR-NK41-F<br>ANON-KSAR-NK49-Q<br>ANON-KSAR-NK42-G<br>ANON-KSAR-NK4V-M<br>ANON-KSAR-NK4K-9<br>ANON-KSAR-NK4U-K<br>ANON-KSAR-NK28-M<br>ANON-KSAR-NK2D-Z<br>ANON-KSAR-NK26-J<br>ANON-KSAR-NK2K-7<br>ANON-KSAR-NK2T-G<br>ANON-KSAR-NKAC-E<br>ANON-KSAR-NKAV-1<br>ANON-KSAR-NKA5-Z<br>ANON-KSAR-NKAJ-N<br>ANON-KSAR-NKAG-J<br>ANON-KSAR-NKF4-4<br>ANON-KSAR-NK3K-8<br>ANON-KSAR-NKF1-1<br>ANON-KSAR-NKDC-H<br>ANON-KSAR-NKDZ-8<br>ANON-KSAR-NKAQ-V<br>ANON-KSAR-NKDF-M<br>ANON-KSAR-NKDV-4<br>Northington Parish<br>Council<br>ANON-KSAR-NKJA-N<br>ANON-KSAR-NKJR-6<br>ANON-KSAR-NKJD-R<br>ANON-KSAR-NKJ5-9<br>ANON-KSAR-NKJS-7 |  |  |
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| ANON-KSAR-NKJ7-B<br>ANON-KSAR-NKJM-1<br>ANON-KSAR-N8UR-X<br>ANON-KSAR-N8UM-S<br>ANON-KSAR-N8EH-4<br>ANON-KSAR-N8EU-H<br>ANON-KSAR-N8M3-Q<br>ANON-KSAR-N8YY-9<br>ANON-KSAR-N8Y3-3<br>ANON-KSAR-N8N8-W<br>ANON-KSAR-N8NZ-Y<br>ANON-KSAR-N8NA-6<br>ANON-KSAR-N8NV-U<br>ANON-KSAR-N8GH-6<br>ANON-KSAR-N85B-E<br>ANON-KSAR-N85U-1<br>ANON-KSAR-N85S-Y<br>ANON-KSAR-N8NK-G<br>ANON-KSAR-N853-Y<br>ANON-KSAR-N8QA-9<br>ANON-KSAR-N8QV-X<br>ANON-KSAR-N8QN-P<br>ANON-KSAR-N8QW-Y<br>ANON-KSAR-N81A-9<br>ANON-KSAR-N8Q4-V<br>ANON-KSAR-N81V-X<br>ANON-KSAR-N8Q7-Y<br>ANON-KSAR-N81W-Y<br>ANON-KSAR-N81X-Z<br>ANON-KSAR-N8XW-6<br>ANON-KSAR-N8XS-2<br>ANON-KSAR-N832-V |  |  |
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| <p>ANON-KSAR-N83V-Z<br/> ANON-KSAR-N8X5-4<br/> ANON-KSAR-N8N4-S<br/> ANON-KSAR-N8VF-K<br/> ANON-KSAR-N8VM-T<br/> ANON-KSAR-N8VN-U<br/> ANON-KSAR-N818-Z<br/> ANON-KSAR-N8WA-F<br/> ANON-KSAR-N89H-R<br/> ANON-KSAR-N8WQ-Y<br/> ANON-KSAR-N88B-H<br/> ANON-KSAR-N88V-5<br/> ANON-KSAR-N88H-Q<br/> ANON-KSAR-N88N-W<br/> ANON-KSAR-N885-4<br/> ANON-KSAR-N88P-Y<br/> ANON-KSAR-N88C-J<br/> ANON-KSAR-N8S4-X<br/> ANON-KSAR-N8ST-X<br/> ANON-KSAR-N8SV-Z<br/> ANON-KSAR-N8MG-B<br/> BHLF-KSAR-N87J-R<br/> Micheldever Parish<br/> Council<br/> BHLF-KSAR-N8B5-E</p> <p><b>(166 comments)</b></p> |  |   |
| <p>BHLF-KSAR-N8BV-F<br/> Fareham Borough<br/> Council</p>   | <p>Support the intention to meet the districts' housing requirement as calculated through the Standard Methodology. Welcome the proposed contribution to the unmet need of neighbouring authorities, which is a substantial contribution to those needs will help South Hampshire authorities deliver on the aims of the</p> | <p>Support welcomed and comments noted. The draft Local Plan proposed a similar approach to Fareham Borough Council. Comments regarding housing</p> |

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|  | <p>Joint Strategy currently under preparation.</p> <p>Fareham Borough Council has included within its Plan a commitment to consider a review the Plan should a more significant need arise from the Joint Strategy work. Given there remains some uncertainty around the final numbers that will need to be met and the Duty to Cooperate requirement, suggest that Winchester City Council considers similar arrangements.</p> <p>Welcome the spatial distribution of housing supply and note the nature of supply, with less than 25% of provision from Local Plan allocations (carried forward or new). Support the aspiration for the delivery of 40% affordable housing on sites of more than 10 dwellings.</p> | <p>provision and the 'buffer' are addressed in subsequent sections of this report.<br/> <b>Recommended response:</b> No change</p>   |
| BHLF-KSAR-N8BB-U<br>Test Valley Borough Council    | <p>Support reference to collaborative working with neighbouring authorities, including the Partnership for South Hampshire (PfSH). The PfSH authorities are jointly working on various strategic planning matters, such as the scale of any shortfall in housing provision over South Hampshire. Note that the Regulation 18 Local Plan includes a 'buffer' of housing supply to help contribute towards any shortfall. As identified in the Test Valley draft Local Plan 2040 Regulation 18 (Stage 1), we are currently seeking to meet our proposed housing requirement in full. Across Southern Hampshire, the amount of unmet need and in which area(s) this may be located is yet to be determined.</p>         | <p>Support welcomed and comments noted. Comments regarding housing provision and the 'buffer' are addressed in subsequent sections of this report.<br/> <b>Recommended response:</b> No change</p> |
| BHLF-KSAR-N8T8-3<br>Olivers Battery Parish Council | <p>Support the principle of including a "buffer" but an additional 1,450 dwellings is more than half of the additional 2,685 houses on new site allocations. This increases the requirement for greenfield allocations across the district.</p>  | <p>Support welcomed and comments noted. Comments regarding housing provision and the 'buffer' are addressed in subsequent sections of this report.<br/> <b>Recommended response:</b> No change</p> |

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|                  | <p>The “buffer” includes an unspecified number from the adjoining districts in PfSH but it is not clear which site allocations relate to the PfSH allowance. These should be in sustainable locations adjacent to the districts with the unmet requirement and not spread across the whole district.</p> <p>The new Government policy ends the ‘duty to co-operate’, so WCC should resist any attempts by PfSH in offloading their responsibilities into Winchester district, review the “buffer” and reduce the overall numbers of new build in the Local Plan.</p> |   |
| ANON-KSAR-NKV9-S | <p>The SHELAA process requires updating in light of changing retail habits. There is a growing number of vacant commercial units which should be repurposed for modern living. (Also agree with the rejection of Approach 3 - included in respondents above).</p>  | <p>Support welcomed and comments noted. The SHELAA has been updated to take account of new sites submitted in response to the draft Local Plan. The Windfall Assessment report 2021 shows a steady supply of residential development in Winchester from redevelopment or conversion of commercial uses and these opportunities form the bulk of the windfall allowance that has already been made for Winchester.</p> <p><b>Recommended response:</b> No change</p> |
| ANON-KSAR-N8XU-4 | <p>Supports the three spatial areas for housing development identified in Policy H1 and the settlement hierarchy outlined under Policy H3.</p>   | <p>Support welcomed.</p> <p><b>Recommended response:</b> No change</p>  |
| ANON-KSAR-NKAK-P | <p>Support the identification of Winchester City as a principal location for growth given its sustainability and access to shops, services, jobs and public transport modes. Agree that Winchester is 'the most sustainable settlement in the District'.</p>   | <p>Support welcomed and comments noted.</p> <p><b>Recommended response:</b> No change</p>   |



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|                  | The delivery of new homes should be optimised within Winchester commensurate with other policies within the emerging Local Plan.   |   |
| ANON-KSAR-NK7T-N | <p>Support the provision of homes for all and agree with the need to provide housing of varied scale, types and tenures. Support the provision of approximately 30% of the housing requirement in Market Towns and Rural Areas which can accommodate sustainable development through a selection of smaller sites. The 'buffer' of 1,450 dwellings is currently an estimate since the scale of shortfall provision is yet to be determined. It is important to quantify the potential shortfall as more homes may be needed in policy H1 and more sites should be allocated.</p> <p>Encourage an increased allocation in more sustainable larger rural settlements such as Denmead which can accommodate further development.</p>  | <p>Support welcomed and comments noted. Comments regarding housing provision and the 'buffer' are addressed in subsequent sections of this report. Comments regarding the distribution of development are addressed in relation to issues raised under policy H3.</p> <p><b>Recommended response:</b> No change</p> |
| BHLF-KSAR-N8TG-J | <p>Support this policy, particularly the overall target of 40% provision of affordable housing and 30% on previously developed land in recognition of the increased development and land costs.</p> <p>Winchester is a high-priced area and the Plan must start with the provision of more social housing, not to be confused with affordable housing. Social housing is generally rented accommodation provided and run by the Council or Housing Trust, whereas affordable housing is most likely to be discounted free-market houses. Affordable housing in a high-cost area is still high cost and must be offset by more rented social housing in the Plan. There should be a separate policy to cover social housing, the supply of which we believe the Council wishes to increase if at all possible. Support affordable housing</p> | <p>Support welcomed and comments noted. Comments regarding the provision of affordable housing are addressed in relation to issues raised under policy H6.</p> <p><b>Recommended response:</b> No change</p>  |

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|                  | provision for market led housing schemes which local people can afford. |   |
| ANON-KSAR-NKBD-G | Query the number of homes being demanded by the Government.             | Support welcomed and comments noted. Comments regarding housing provision are addressed in are addressed in subsequent sections of this report.<br><b>Recommended response:</b> No change |

| <b>Comments which neither support or object to H1 - housing provision</b>                           |  |  |
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| <b>Respondent number</b>  | <b>Comment</b>   | <b>Officer Comment</b>   |
| BHLF-KSAR-N871-Y<br>BHLF-KSAR-N87Q-Y<br>BHLF-KSAR-N87B-G<br>BHLF-KSAR-N8ZM-X<br><b>(4 comments)</b> | <p>The majority of the overall requirement (64%) is to be met through existing permissions and completions with the remainder through existing (retained) and new allocations (24%), and windfall (12%). The delivery from existing planning permissions and completions is noted, but the main purpose of this review is to positively plan for additional housing needs. Direct allocations provide a “high level of certainty”, yet only 66% of the remaining requirement is addressed through direct allocations with the remaining requirement through windfall development, which is far less certain. This is a radical change from previous Local Plans, where delivery was secured through direct allocations and no reliance on windfall development, which has maintained a 5-year housing land supply and allowed for balanced growth in the District. The current strategy brings significant uncertainty and a high risk of under-delivery.</p> <p>The NPPF confirms that Councils may rely upon windfall development but this needs to be supported by compelling evidence and should be realistic. Over-reliance based on past</p> | <p>Comments noted. Comments regarding sources of housing supply, including windfall are addressed in subsequent sections of this report.</p> <p><b>Recommended response:</b> No change</p> |

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|  | <p>trends is flawed and more compelling evidence is needed. Changes in legislation brought a significant relaxation of permitted development rights that has enabled housing delivery to be boosted through the change of use and conversions of non-residential buildings, but in some instances the legislation is time limited and there is no guarantee that conversions will continue to be carried out at the same rate in future.</p> <p>The Partnership for South Hampshire (PfSH) Economic, Employment and Commercial Needs Study indicates that there is now greater equilibrium and that further losses through permitted change of use is far less likely to continue.</p> <p>Windfall sites are ordinarily found within the settlement boundary but the number of suitable and available sites will reduce over time, unless the settlement boundary is expanded, Windfall numbers are provided for settlements based on their sustainability “score”, but there is no guarantee that development will come forward on the most sustainable sites within each settlement. Reliance on windfall development significantly undermines the delivery of supporting infrastructure and sites will often fall below the affordable housing threshold.</p> <p>A strategy based on a high plan-wide windfall does not meet the tests of soundness in the NPPF or provide a high level of certainty and therefore, is not positively prepared, justified or effective. The windfall allowance should be reduced and replaced with site allocations which have been assessed through a Sustainability Appraisal and site selection process, with settlement boundaries amended where appropriate to</p> |  |
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|   | <p>accommodate new development.</p> <p>The plan adopts a “brownfield first” approach which is supported in principle, but evidence should be provided that the number of homes proposed on brownfield sites is realistic.</p>   |   |
| <p>BHLF-KSAR-N8TW-2<br/>Eastleigh Borough Council<br/>BHLF-KSAR-N8BP-9<br/>Southampton City Council</p> | <p>Note the total proposed housing supply is 15,620 dwellings which is split between Winchester Town (5,670 dwellings), the South Hampshire Urban Areas (5,700 dwellings) and Market Towns and Rural Area (4,250 dwellings). Welcome the additional buffer of 1,450 dwellings in addition to the calculated standard method figure, which will help to cater for any potential future increases in the standard method and contribute towards the identified PfSH shortfall.</p> <p>Welcome the continued cooperation with neighbouring authorities through PfSH, the outcome of the final PfSH Joint Strategy will indicate whether Winchester should increase the buffer. Recommend that the Council considers this further in parallel to the PfSH Joint Strategy in progressing the next stage of its plan. This will help with responding effectively to any future changes in the housing needs which may arise from the PfSH Joint Strategy.</p> | <p>Support welcomed and comments noted. The City Council has worked with PfSH to develop a Joint Strategy, with the PfSH Spatial Position Statement being published in December 2023. This determined the scale of unmet need at the time and a strategy for how it should be resolved. This will be referred to at the next stage of the Local Plan and is addressed in subsequent sections of this report.<br/><b>Recommended response:</b> No change</p> |
| <p>BHLF-KSAR-N8ZE-P<br/>Portsmouth City Council</p>   | <p>The Standard Methodology has been used to calculate a housing need of 14,178 additional dwellings and Winchester has established a buffer of 1,450 homes to cater for potential future increases in the Standard Methodology and to help contribute to the Partnership for South Hampshire (PfSH) shortfall. Winchester shares a common boundary with Portsmouth and the last Strategic Housing Market Assessment prepared by PfSH noted that some of the District’s southern wards are in the Portsmouth Strategic Housing Market Area. Both the City and District Councils have worked closely together</p>  | <p>Comments noted. The City Council has worked with PfSH to develop a Joint Strategy, with the PfSH Spatial Position Statement being published in December 2023. This determined the scale of unmet need at the time and a strategy for how it should be resolved. The draft Local Plan included a substantial ‘buffer’ to help contribute to unmet needs and any changes to the</p>  |

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|  | <p>as part of PfSH. As Portsmouth is one of the local authorities struggling to meet its need, this additional buffer is welcomed.</p> <p>Portsmouth currently has an expected shortfall of approximately 3,600 dwellings and has previously requested that its neighbours accommodate a portion of its unmet need. This included Fareham Borough Council, which agreed to accommodate 800 dwellings of unmet need from the City in its emerging Local Plan. The City Council would therefore like to request that Winchester City Council earmarks a meaningful portion of its housing buffer towards meeting unmet need of the City of Portsmouth, which should be located within a sustainable travel to work area from Portsmouth. Portsmouth looks forward to addressing the matter of unmet housing need and other strategic cross boundary issues in a new Statement of Common Ground.</p> | <p>Government's standardised mythology. This has been reviewed and comments regarding housing provision and the 'buffer' are addressed in subsequent sections of this report.</p> <p><b>Recommended response:</b> No change</p>  |
| <p>BHLF-KSAR-N86R-Y<br/>Havant Borough Council</p> | <p>Note that the plan makes provision to meet Winchester's housing need in full, together with some need from the South Downs National Park. Joint working at the PfSH level has shown significant unmet need across the sub-region, including need in districts bordering Winchester, in particular Portsmouth and Havant.</p> <p>It is acknowledged that Havant's evidence base on housing supply is currently not well enough advanced to confirm supply against the Standard Method and thus categorically confirm whether or not it will be able to meet its own development needs over the plan period. No formal request to accommodate unmet need from Havant has been submitted.</p> <p>Before making any such request, Havant Borough Council will continue to build its evidence base regarding housing need and</p>   | <p>Support welcomed and comments noted, as is the work being undertaken by Havant Borough Council to establish its capacity to meet development needs and the scale of any shortfall. The City Council has worked with PfSH to develop a Joint Strategy, with the PfSH Spatial Position Statement being published in December 2023. This determined the scale of unmet need at the time and a strategy for how it should be resolved. Comments regarding housing provision and the 'buffer' are addressed in subsequent sections of this report.</p> <p><b>Recommended response:</b> No change</p> |

supply, including an updated SHLAA, and a detailed constraints and supply analysis. HBC will leave no stone unturned to meet its own need, before making requests to other districts. However, it is highly likely that Havant will be forced to make a formal request in due course and, whilst it is understandable that this point is not specifically addressed in Winchester's Regulation 18 Plan, it is considered inevitable that this will need to be addressed and further sites allocated within the Regulation 19 Plan.

HBC appreciates that the Local Plan acknowledges the likely shortfall in the PfSH area, and that it has included an allowance of 1450 to potentially contribute to that need. HBC also supports Winchester in reconsidering the capacity of the land West of Waterlooville and including additional supply through site allocation SH1. However, it is noted that the same 'buffer' of 1450 may be needed by WCC themselves should there be changes to the standard method, which could prejudice WCC's ability to help with unmet need from neighbouring districts. It is not clear what the figure of 1,450 is based on, or why it could not be higher, the 'Development Strategy and Site Selection' Paper does not elaborate. WCC's published SHELAA indicates that it is not a lack of potential sites that limits the district's ability to plan for a larger number. HBC would therefore urge WCC to reconsider as it works towards its Regulation 19 Plan, whether additional need from neighbouring districts could be planned for.

Joint working will be required as both Winchester and Havant move towards their Regulation 19 Plans. Thank you for WCC's desire to be involved in discussions on the nature and location of development (including housing and traveller sites) and infrastructure in HBC's area. Havant would equally like to

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|   | <p>continue to engage in detail in Winchester’s strategy and site selection as the District Local Plan moves forward, including an invitation for Winchester to work with Havant on an analysis of development constraints and supply in both districts. HBC is commissioning a piece of work for its whole area to support the Local Plan in any case, but joint working would be beneficial. HBC and WCC have a proven track record of positive collaboration on cross-boundary matters and we look forward to continuing that positive collaboration and discussing our respective local plans as they progress.</p> |   |
| <p>BHLF-KSAR-N8TE-G<br/>East Hampshire<br/>District Council</p>     | <p>Support the ‘buffer’ but as much as possible needs to be looked at for the unmet needs of the PfSH area as the numbers presented are significantly less than envisaged by wider PfSH.</p>  | <p>Support welcomed and comments noted. The City Council has worked with PfSH to develop a Joint Strategy, with the PfSH Spatial Position Statement being published in December 2023. This determined the scale of unmet need at the time and a strategy for how it should be resolved. Comments regarding housing provision and the ‘buffer’ are addressed in subsequent sections of this report.<br/><b>Recommended response:</b> No change</p> |
| <p>BHLF-KSAR-N8Z7-8<br/>South Downs National<br/>Park Authority</p> | <p>The SDNPA is in the process of starting its Local Plan Review (LPR). Reference in the Draft Plan to 500 homes within the SDNP area of Winchester District will need much further evidence and we will continue to work proactively with WCC towards achieving a robust joint position, which does not pre-empt or prejudice the South Downs LPR.</p> <p>We are mindful of an upcoming NPPF prospectus in which housing numbers should “be an advisory starting point, a guide that is not mandatory” and authorities will need to take into</p>  | <p>Comments noted, the desire to work positively towards a new Statement of Common Ground is welcomed. It is acknowledged that the National Park Authority is at an early stage of its Local Plan Review and that its precise contribution is yet to be confirmed. The estimate of 500 dwellings within the National Park part of Winchester District had been agreed at officer level as a</p>   |

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|  | <p>account what should be protected; i.e., Green Belt, National Parks, the character of the area, etc. The Statement also alluded to alterations to the need to demonstrate a rolling 5-year land supply.</p> <p>We will look to work positively with WCC towards achieving a robust joint position on housing through a new Statement of Common Ground, taking into account forthcoming amendments to the NPPF.</p>  | <p>suitable working basis for the development of the Winchester Local Plan. Comments regarding housing provision in the SDNP are addressed in subsequent sections of this report.</p> <p><b>Recommended response:</b> No change</p>  |
| <p>BHLF-KSAR-N8R2-U<br/>Hursley Parish Council</p> | <p>The proposed housing requirement of over 15,600 dwellings by 2039 has a significant impact on the calculation of the Winchester District's five-year supply of housing land. If such a supply cannot be demonstrated, then the Council's plan will be challenged by developers. Overestimating housing numbers now may impact on the five-year supply in future years.</p> <p>15,600 homes over 20 years means 780 dwellings would need to be built each year - how is the local plan protected from an economic downturn, rise in interest rates and fall in land value?</p> <p>Over the last 10 years the Council has achieved an average of 551 dpa and only exceeded 800 dpa on two occasions. The shortfall needs to be accounted for in future years and the annual requirement can go up in any five-year period.</p> <p>The plan proposes five phases with an emphasis on higher completions in the first 10 years of the plan. For 2019-2024 the proposed rate is 940 dpa (1,880 in the first 2 years) which compares with the 1,517 which have been built. The shortfall is already resulting in the five-year requirement rising to higher levels than can be built, making the prospect of delivering the local plan projections more unlikely. It faces the prospect of</p> | <p>Comments noted. Comments regarding housing provision, the Standard Method, land supply and unmet needs are addressed in subsequent sections of this report. Comments on the Plan's phasing policy (H2) are addressed in relation to that policy.</p> <p><b>Recommended response:</b> No change.</p> |



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|  | <p>having to increase the buffer to 20% under the current national guidance, but increasing the buffer to compensate for the underachievement of delivery makes no sense and does not remedy the underlying issue.</p> <p>The outcome is likely to be the opposite of what the Council is trying to achieve in allocating a higher figure ie; the new plan will make it more vulnerable to appeals and lose control of where development takes place. Sites may be proposed in locations poorly served by public transport which do little to support the Council's objective of a carbon neutral district by 2030. Given the risk involved it would be of interest to understand what alternative options have been considered.</p> |   |
| ANON-KSAR-NKA6-1<br>Durley Parish Council    | Development sites should be well served with local public transport and infrastructure which this Plan does appear to support. Durley is not well served with public transport or good broadband / mobile phone service.   | <p>The Plan seeks to locate development in sustainable locations that are, or can be, served by infrastructure and facilities. It does not propose a housing target for Durley.</p> <p><b>Recommended response:</b> No change.</p>      |
| ANON-KSAR-NK1Z-N<br>Shedfield Parish Council | Policy requirements are frequently over-ridden by subsequent applications to increase dwelling size. There have been very limited numbers of new dwellings for the elderly or those with limited mobility. Those who have spent their lifetime in the community may be reluctant to downsize due to the lack of affordable smaller homes in the vicinity.  | <p>Comments noted. Policy H5 seeks to control dwelling sizes and the provision of housing for older people. Any subsequent applications would remain subject to Local Plan policies.</p> <p><b>Recommended response:</b> No change.</p> |
| BHLF-KSAR-N86V-3                             | The Local Plan confirms the use the Standard Method (SM) requirement advised by national policy as the starting point to determine the minimum housing requirements and this is welcomed. The most recent published requirement equates to 715 dwellings per annum. Table H1 'back-dates' the SM requirement that was relevant to the previous 3 years of the  | <p>Comments regarding the Plan period, housing provision, the Standard Method, the 'buffer' and housing supply are addressed in subsequent sections of this report.</p> <p><b>Recommended response:</b> No change</p>                   |

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|  | <p>Local Plan period, but National Planning Practice Guidance (NPPG) does not advocate this approach.</p> <p>The 1,450 housing requirement ‘buffer’ for meeting for unmet needs in neighbouring local planning authorities is also welcomed, though it is unclear how the figure has been calculated. There are unmet needs arising in a number of areas including Portsmouth, Southampton, Gosport, and Havant, totalling nearly 13,000 homes. Whilst clearly Winchester cannot be expected to meet all of these needs it should be looking at developing a spatial strategy that would meet more of these needs currently proposed. The Integrated Impact Assessment (IIA) Report does not appear to test a strategy that goes beyond what is being proposed in the consultation document. Option 1A tests an option that delivers an additional 2,000 homes but states in 4.117 that it the Council expects the PfSH to identify and deal with unmet need for housing. Whilst PfSH provides welcome coordination on such matters it is still the responsibility for Councils to plan for unmet needs through the preparation of their local plans. The Council must therefore examine strategies that contribute more towards the unmet needs of other areas and allocate more sites for residential development in the next iteration of the local plan.</p> <p>The Plan identifies a windfall provision of 1,975 dwellings based on the ‘Windfall Assessment ‘ (2021), which concludes that windfall allowance of 1,725 dwellings (based on 115 dwellings per annum), should be used. It is unclear where the additional 250 allowance has been identified from. The background paper acknowledges that the windfall allowance is in excess of the 70 dwellings per annum in the current adopted Plan. Opportunities for windfall development would be expected to decline so, if</p> |  |
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|                  | <p>anything, it would be expected this figure would be reduced.</p> <p>St. John Moore Barracks is identified for a mixed use allocation including significant residential provision of 900 dwellings, based on a phased closure of the facility between 2022 and 2024. The Ministry of Defence has recently announced that this will be delayed for a further 2 years and the Barracks will not be vacated until 2026. This decision will inevitably delay delivery of any allocation in the Plan, and therefore delivery of housing, with some very likely to extend beyond the end of the plan period. Allocations at Central Winchester (formerly Silver Hill) and Station Approach are carried forward from the adopted Local Plan (Policy W7 and W8 respectively), and combined are anticipated to deliver 550 houses. It is acknowledged that these are significant opportunities to deliver redevelopment and regeneration but they are both long-standing and complex allocations which have to date not been subject to any planning permissions or applications.</p> <p>Given all of the above, further sites should be identified to meet housing requirements, particularly to take into account the strong possibility of shortfalls in the early years of the Plan, in the event there are delays to the delivery of some of the key strategic sites such as Sir John Moore Barracks, Station Approach and Central Winchester.</p> |   |
| BHLF-KSAR-N867-4 | <p>The Local Plan confirms the use the Standard Method (SM) requirement advised by national policy as the starting point to determine the minimum housing requirements and this is welcomed. The most recent published requirement equates to 715 dwellings per annum. Table H1 'back-dates' the SM requirement that was relevant to the previous 3 years of the</p>   | <p>Comments regarding the Plan period, housing provision, the Standard Method and the 'buffer' are addressed in subsequent sections of this report.<br/> <b>Recommended response:</b> No change</p> |

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|                  | <p>Local Plan period, but National Planning Practice Guidance (NPPG) does not advocate this approach.</p> <p>The 1,450 housing requirement ‘buffer’ for meeting unmet needs in neighbouring local planning authorities is also welcomed, though it is unclear how the figure has been calculated. There are unmet needs arising in a number of areas including Portsmouth, Southampton, Gosport, and Havant, totalling nearly 13,000 homes. Whilst clearly Winchester cannot be expected to meet all of these needs it should be looking at developing a spatial strategy that would meet more of these needs currently proposed. The Integrated Impact Assessment (IIA) Report does not appear to test a strategy that goes beyond what is being proposed in the consultation document. Option 1A tests an option that delivers an additional 2,000 homes but states in 4.117 that it the Council expects the PfSH to identify and deal with unmet need for housing. Whilst PfSH provides welcome coordination on such matters it is still the responsibility for Councils to plan for unmet needs through the preparation of their local plans. The Council must therefore examine strategies that contribute more towards the unmet needs of other areas and allocate more sites for residential development in the next iteration of the local plan.</p> |   |
| BHLF-KSAR-N86X-5 | <p>Strategic Policy H1 seeks to deliver a housing provision of around 15,620 dwellings between 2019-2039 through prioritising suitable previously developed land, strategic allocations and allocated sites. It would be pragmatic to include specific reference to the housing requirement in table H2 to ensure a specific, measurable figure is noted in policy. Support the proposed housing need in Table H2 which allows flexibility above the standard method and includes a buffer to support unmet housing needs across the PUSH. This is considered to</p>   | <p>Table 2 already sets out the housing requirement, as does Policy H2, so it is not clear what change is sought.</p> <p>Comments regarding housing provision, the Standard Method, the ‘buffer’ and housing supply are addressed in subsequent sections of this report.<br/><b>Recommended response:</b> No change</p> |

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|                  | <p>be a positively prepared strategy seeking to deliver a housing need figure which is greater than the currently adopted Core Strategy housing requirement and provides an allowance for unmet housing needs arising from Winchester’s neighbours.</p> <p>However, this housing requirement reflects an identified need for housing alongside a buffer to deliver housing needs which are likely to arise from Winchester’s neighbours. The Council should identify and plan for additional housing above the housing need figure. The housing need figure is inclusive of a 1,975-dwelling contribution from windfall development, which by definition is unidentified and, while the Council has provided some evidence justifying the proposed allowance, there is a potential that such sites may not come forward. Given the scale of strategic development and brownfield sites within the emerging Local Plan there is potential for delivery issues to occur.</p> |  |
| BHLF-KSAR-N8T1-V | <p>Housing requirements should be expressed as a minimum, not ‘about’. The standard method identifies a minimum annual housing need figure, not a housing requirement. The commitments within the SDNPA should be excluded as these do not meet the needs of the plan area. Sources of supply within the Market Towns and Rural Area should be demonstrated to meet the proposed 4,250 dwellings.</p> <p>The Plan proposes a notional buffer figure of 1,450 dwellings but the latest PfSH December 2022 draft Statement of Common Ground identifies a shortfall of some 20,000 homes (2022 – 2036). Winchester is well-placed to meet unmet needs, unlike seven of the ten authorities with a sizeable shortfall. If all the buffer of 1,450 dwellings were attributed to the shortfall, then this is a minor contribution of the unmet needs and the</p>   | <p>Comments regarding housing provision, the Standard Method and the ‘buffer’ are addressed in subsequent sections of this report.</p> <p>There are 4 neighbourhood plan areas within the District, with one being in the South Downs (Twyford) and having a housing target set in the existing South Downs Local Plan. The 3 remaining neighbourhood plan areas within the rest of the District all have a housing target set in the draft Plan, at policies NA3 (New Alresford), D1 (Denmead) and HU1 (Hursley), albeit that Hursley</p> |

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|                  | <p>emerging plan should make a greater contribution and also define where such needs should be met within the PfSH part of Winchester District.</p> <p>It is not clear whether the disaggregated figures in Policy H1 are targets, minimums or indicative. Further evidence is required to demonstrate the outstanding planning permissions and commitments. The NPPF requires the Local Plan to ‘set out a housing requirement for designated neighbourhood areas...’ - There are four designated neighbourhood areas in the District and no housing requirement has been established for any.</p>  | <p>has a zero neighbourhood plan housing requirement.<br/> <b>Recommended response:</b> No change</p>  |
| BHLF-KSAR-N863-Z | <p>Welcome the use of the Standard Method (SM) as the starting point to determine the starting point for housing requirements and that exceptional circumstances have not been identified to justify an alternative. However, the housing need should be 14,300 rather than 14,187 (715 x 20 years) and the ‘buffer’ should be recalculated to 1,320 dwellings. It is normal to apply an additional 10% buffer to allow for non-delivery, which is particularly important given current economic uncertainty.</p> <p>There is no detail of whether the supply expected in the South Downs National Park is deliverable, or indication of whether other unmet needs are being addressed (e.g. Basingstoke, Wiltshire). The remaining potential allocation to meet unmet needs is inadequate given the shortfall of 20,000 dwellings within PfSH. Other PfSH authorities that are further forward in their local plans have been able to make little or no contribution to meet PfSH needs so Winchester needs to make a larger contribution. The Plan does not say what proportion of the proposed buffer is to meet unmet needs. No statements of common ground have been signed with other authorities, which will be necessary to satisfy the duty to cooperate.</p> | <p>Comments regarding housing provision, the Standard Method, the ‘buffer’ and housing supply are addressed in subsequent sections of this report.<br/> <b>Recommended response:</b> No change</p> |

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|                  | <p>Support the discounting of windfall in the early Plan period to avoid double counting, but it is not possible to determine whether SHELAA sites have been double-counted. Windfall assumptions should not be applied to smaller settlements and specific site allocations should be identified instead.</p> <p>Adoption of the Plan in 2024 is optimistic and it may be necessary to extend the Plan period. Also it is not clear why the period starts at 2019 rather than the current monitoring year.</p> <p>The Plan should consider further housing growth to support the economic growth aspirations of PfSH and the LEP. The Council should consider whether any growth deals or planned infrastructure improvements could lead to the need for a higher housing requirement. PfSH considered the need for an economic uplift in its 2016 SHMA, we suggest a similar exercise is undertaken.</p> |  |
| ANON-KSAR-N8QZ-2 | <p>The North and Mid Hampshire Integrated Care Board has worked with Practices and Primary Care Networks to understand their clinical vision and plans to respond to an increasing population with more complex conditions across the Winchester City Council area. Many Practices feel the current level of development is unsustainable for local primary care services to appropriately manage and proactively care for without significant capital investment into the infrastructure that underpins the delivery of services and grows with the local population.</p> <p>Whilst the ICB receives a small capital funding pot to assist with premises improvements, this is significantly oversubscribed and many practices are not able to fund the improvements and</p>  | <p>Comments noted. Officers have held a number of meetings with the ICB to understand further this representation and others on proposed site allocations in the regulation 18 draft Local Plan. Further information has been sought from the ICB to provide more detail on the nature and scope of any deficit in GP surgery facilities and how it may be resolved. This includes confirmation of which surgeries serve proposed allocations and which may require improvement. At this point it is considered prudent for the Plan and</p> |

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|  | <p>expansion they need to sustain safe services. Appropriate NHS infrastructure is of high priority to developers and local authorities and we would like to work more closely with you to ensure investment into primary care estate is supported and prioritised accordingly. To this end, we attached a financial ask of each proposed development area and overview of the capacity (or not) of each practice. We would also impress the need to agree an infrastructure policy in conjunction with your strategic policy on housing provision.</p> <p>Where surgeries are already oversubscribed, we object to these allocations policies. Where our submission finds that surgeries within the allocations have capacity, we neither support nor object to these allocations.</p> <p>General Practice and the NHS generally are experiencing significant difficulties with a reduced and fatigued workforce, an ageing population with more complex conditions and increasing comorbidities, and higher expectations regarding health service delivery. Recent challenges facing the sector are not expected to diminish in the short to medium term.</p> <p>Whilst we appreciate each Planning Authority has a housing allocation it must deliver, we must impress the importance of a collaborative approach to ensure our health services are appropriately supported to plan for growth and can remain resilient. We also want to ensure that primary care colleagues are consulted on the impact of future development once the Local Plan has been adopted.</p> <p>Similarly with primary care provision, dental access requires expansion in line with population increases. Dental access is on</p> | <p>associated Infrastructure Delivery Plan to note this position and set out a mechanism to deal with any necessary infrastructure requirements arising from this request. The Infrastructure Delivery Plan will include the most recent information received from the ICB regarding the capacity of infrastructure and identified need for any improvements.</p> <p><b>Recommended response:</b> No change</p> |
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|                  | <p>the national agenda due to the limited NHS capacity available to the population.</p> <p>We are keen to continue this conversation through our Local Estates Forum and through our partnership working and I would be happy to discuss the contents of our submission further.</p>  |   |
| BHLF-KSAR-N86Z-7 | <p>We set out the Hampshire and Isle of Wight Integrated Care Board's (ICB's) response, and the impact of proposed development contained within the SHELAA sites published (partially summarised above – comment ANON-KSAR-N8QZ-2)</p> <p>The proposed sites have been reviewed on behalf of the NHS Hampshire and Isle of Wight Integrated Care Board (Primary Care) and GP Services. The NHS has reviewed the sites which have been identified as part of the HELAA and have produced an analysis of the potential impacts on primary care health services which will need to be considered as part of any future planning request. In order to undertake an assessment of the effect of the Local Plan sites we have grouped the developments with the GP Practices that serve the local population. To forecast population for each development the maximum number of dwellings has been used with an average occupation of 2.4 (England national average) people per dwelling.</p> <p>These are main highlight points from the more detailed analysis:</p> <ol style="list-style-type: none"> <li>1. Currently there are 19 GP Practices and branch surgeries that provide primary care services for the areas identified as being suitable for new developments in the consultation document released by Winchester City Council.</li> <li>2. 17 GP practices (89%) have more patients than they physically have capacity to manage.</li> </ol> | <p>Comments noted. Officers have held a number of meetings with the ICB to understand further this representation and others on proposed site allocations in the regulation 18 draft Local Plan. Further information has been sought from the ICB to provide more detail on the nature and scope of any deficit in GP surgery facilities and how it may be resolved. This includes confirmation of which surgeries serve proposed allocations and which may require improvement. At this point it is considered prudent for the Plan and associated Infrastructure Delivery Plan to note this position and set out a mechanism to deal with any necessary infrastructure requirements arising from this request. The Infrastructure Delivery Plan will include the most recent information received from the ICB regarding the capacity of infrastructure and identified need for any improvements.</p> <p><b>Recommended response:</b> No change</p> |

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|                  | <p>3. Currently there are 70,302 more patients across the Local Plan area than there is capacity and in total the Local Plan could increase this by a further 30,166 patients.</p> <p>Following conversations with Winchester City Council the NHS has been requested to provide indicative developer contribution requests. Based upon the maximum dwelling estimates for the proposed sites the following indicative contribution requests have been calculated: Primary Care: £615 per dwelling. The contributions will be used to either expand existing GP surgeries or build new surgeries. The calculation is based upon the NHS Health Contributions Approach.</p> |  |
| ANON-KSAR-NKGG-R | <p>Housing policy should come from the council not from developers. Houses need to be built in communities that can provide for their needs - transport, education, health, open spaces etc.</p>   | <p>The Council is responsible for producing the Local Plan but this must conform to Government policy. The Plan seeks to locate development in sustainable locations that are, or can be, served by infrastructure and facilities.</p> <p><b>Recommended response:</b> No change.</p>  |
| ANON-KSAR-NK29-N | <p>The build rate does not state any justification for the impact on biodiversity and climate crisis. The Plan should include estimates of carbon impact so that this can be monitored against the Council goal of reaching net zero.</p>  | <p>Government policy requires local plans to identify and meet housing needs and there is no requirement to justify this in terms of carbon impact. However the Local Plan seeks to plan for development in the most sustainable way and as the Council has a climate emergency the Plan includes a dedicated topic on Carbon Neutrality and low carbon infrastructure. The Plan's policies have been subject to an Integrated Impact Assessment and</p> |

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|                  |  | Habitat Regulations Assessment which cover these matters.<br><b>Recommended response:</b> No change.  |
| ANON-KSAR-N8EY-N | Government policies on housing provision change and local requirements should be provided for, not those dictated by Government.   | The current situation regarding Government policy and the requirements for the Local Plan are addressed in subsequent sections of this report.<br><b>Recommended response:</b> No change  |
| BHLF-KSAR-N8TB-D | The housing targets are based upon an outdated starting point, pre pandemic and not reflective of changes since 2014, such as the 2021 census. They also do not reflect the nature of the District, incorporating a large area of National Park. Recently announced Government changes to housing targets give more uncertainty, as does the Plan's dependence on John Moore Barracks and the risk that PfSH "pushes" housing into the District. I understand you need to draw a line in the sand and plan from there, but the combination of these factors suggests a pause for review of the housing target. | Comments regarding housing provision, the Standard Method and unmet needs are addressed in subsequent sections of this report.<br><b>Recommended response:</b> No change  |
| ANON-KSAR-NK79-T | The total provision of 15,620 is much too high. The pricing differential in the National Park influences the pricing and affordability multiplier that is used to calculate housing needs and unduly increases this. This pricing differential should be removed from the calculation for the rest of the district.<br><br>No housing should be taken from PfSH, there are 19,000 fewer households in the 2021 Census than were expected at the time of the 2014-projections. The Government wishes to encourage brownfield and cities first, so the urban PfSH authorities need to work harder to find sites. | Comments noted. The Standard Method calculation is set by Government, as are requirements about unmet needs and the Duty to Cooperate. Comments regarding housing provision, the Standard Method and unmet needs are addressed in subsequent sections of this report.<br><b>Recommended response:</b> No change |
| BHLF-KSAR-N8RZ-3 | Development should be better regulated and financial considerations of developers should not be the major factor in  | Comments noted. Comments regarding housing types/sizes and affordable   |

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|                         | <p>any agreement. Understand that development is needed and would not go ahead if there wasn't any profit in it, but it is time for the needs of local emergency and other workers to be better recognised.</p> <p>Rather than permitting large homes which encourage people to move into Winchester, with potentially more car use/commuting, starter homes and/or council houses should be an important aspect of the Local Plan and would help in decreasing CO2 emissions/pollution by reducing commuting into and out of the City.</p>  | <p>housing are addressed in relation to representations on Policies H5 and H6.<br/> <b>Recommended response:</b> No change.</p>  |
| <p>BHLF-KSAR-N8Z6-7</p> | <p>The 2020 Housing Market Assessment identifies the net need for affordable homes between 2019 and 2036 comprises: Rented Affordable Housing 220 per annum; Affordable Home Ownership 123 per annum. The plan period is longer than the 17 year period which these estimates cover, which would increase the number of new affordable homes required to 6,860. To achieve the provision of this amount of affordable housing, there is a need to increase the overall requirement.</p> <p>Between 2011/12 and 2020/21 the number of new affordable homes provided has never exceeded 300 dwellings per annum. There is a need to increase the delivery of affordable housing illustrating that the housing requirement can justifiably be increased to address what is recognised by the District Council as a “major issue”.</p> <p>The Local Plan should look forward at least 15 years from adoption, which is suggested to be in August 2024. This is over ambitious and unrealistic, the plan period should extend to 2040. On the basis of the way the housing requirement is</p> | <p>Comments noted. Comments regarding housing provision, affordability, the Plan period, windfall and unmet needs are addressed in subsequent sections of this report. These conclude that the Plan period should be updated to 2020 – 2040.</p> <p>The impact of affordability on the housing requirement is also considered in the section below on ‘Other Factors Which Could Affect the Standard Method Figure’. This concludes that this is already taken into account in the Standard Method calculation and is not a reason to increase the housing requirement further.</p> <p>Comments on the distribution of housing and provision at Denmead are addressed in relation to Policies H3 and</p> |

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|                  | <p>calculated this would increase to 15,000 new homes.</p> <p>It is widely understood the urban areas within PfSH cannot meet their housing requirement. The recently published Main Modifications for the Fareham Local Plan refer to a level of unmet need of 13,000 at October 2021. The consultation includes a “buffer” of 1,450 additional homes, part of which is a contribution to that unmet need. Even assuming that all of that buffer was to meet the assessed level of unmet need, that would represent barely 10%. The buffer is intended to also provide flexibility and an amount of housing that compensates for the inevitable situation where not all sites which the Council identify are developed as intended. Table H2 should be amended to clearly state what level of contingency is proposed and what contribution is made to unmet need in PfSH, which should be at those settlements which are related to those urban areas.</p> <p>Table H2 assumes that almost 2,000 dwellings will be delivered as windfalls, which is considered unrealistic. It is assumed that 50 windfalls will occur at each of the larger settlements but this appears nothing more than a broad assumption without credible justification.</p> <p>The housing requirement in Strategy Policy H1 should be increased and the components of supply revised. As a consequence, the amount of additional allocations to be made in the Local Plan (and the allowance for Denmead Neighbourhood Plan) should be increased.</p> | <p>D1. The Local Plan will set a housing target for Denmead but any site allocations will be made through a revision to the Denmead Neighbourhood Plan.</p> <p><b>Recommended response:</b> No change.</p> |
| BHLF-KSAR-N864-1 | Local authorities should act decisively and plan proactively to ensure that the Housing Market Area (HMA) realises its potential for growth and the allocation of land for development in   | Comments noted. Comments regarding housing provision, the Standard Method, affordability and the ‘buffer’ are  |

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|  | <p>Winchester should reflect the objectively assessed housing need of the wider HMA. It is not obvious how Table 1 complies with the guidance for calculating housing needs. The basis for calculating need is to use the submission year of the plan as the starting point and then calculate need and a trajectory over the plan period. Previous targets and delivery are not necessarily relevant.</p> <p>There is no discussion about the potential for uplifts to help meet specific housing needs of the community (e.g. for Affordable Housing). The Strategic Housing Market Assessment (SHMA) suggests that Affordable Housing need equates to 220 units per year, which is around 30% of the latest annual housing need figure of 715. Therefore, an uplift is unlikely to be justified, but the need for Affordable Housing should be reviewed, given that the evidence is nearly three years old.</p> <p>The inclusion of a 'buffer' for potential unmet housing needs from neighbouring authorities (or for changes to the standard methodology) is logical but the figure of 1,450 is arbitrary and must be kept under review and fully justified in the publication version of the Local Plan.</p> <p>There is an error in H2, where it is suggested the need figure for the whole plan period of 20 years is 715 dwellings per annum (dpa). <math>20 \times 715 = 14,300</math> not the 14,178 suggested in table H2. The figure of 14,300 is likely to be the most appropriate minimum figure, but that the plan period should be adjusted to 2022-2042. The PPG explains that housing targets are effectively reset by the standard methodology, so it is not clear what the justification is for citing previous completions.</p> | <p>addressed in subsequent sections of this report. These conclude that the Plan period and the Standard Method figures should be updated, so the housing requirement and Table H2 will also be updated.</p> <p><b>Recommended response:</b> No change.</p> |
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|  | <p>Commitments and windfall are acceptable components of supply.</p> <p>Therefore, the housing requirement could be 15,750 (14,300 + 1,450) and the supply is likely to be closer to 14,112 (if completions are removed), a potential shortfall of 1,638 dwellings.</p> |  |
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| <b>Comments which object to H1 - housing provision</b>   |  |   |
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| <b>Respondent number</b>   | <b>Comment</b>   | <b>Officer Comment</b>  |
| ANON-KSAR-NK21-D<br>ANON-KSAR-NKZU-S<br>ANON-KSAR-NKJ4-8<br>ANON-KSAR-NKJV-A<br>ANON-KSAR-N8M7-U<br>ANON-KSAR-N85W-3<br>ANON-KSAR-N8Q1-S<br>ANON-KSAR-NKJC-Q<br>ANON-KSAR-N85K-Q<br>ANON-KSAR-N8YM-W<br>ANON-KSAR-NKAB-D<br>ANON-KSAR-NKME-V<br>ANON-KSAR-N81F-E<br>ANON-KSAR-N83Q-U<br>ANON-KSAR-N85J-P<br>ANON-KSAR-N8QS-U<br>ANON-KSAR-N81U-W<br>ANON-KSAR-NKUC-2<br>ANON-KSAR-NKKF-U | <p>The Standard Method should be the starting point for calculating the housing need, but the Local Plan housing requirement should be increased / additional sites allocated for one or more of the following reasons:</p> <ul style="list-style-type: none"> <li>• The standard method is not properly applied;</li> <li>• The standard method is a minimum figure / is likely to increase / must be fixed by the time the Local Plan is submitted;</li> <li>• There should be additional provision to improve affordability / affordable housing provision;</li> <li>• The proposed 'buffer' of 1450 dwellings is inadequate as it does not provide for unmet needs / under-delivery / uncertainty;</li> <li>• The Plan is unlikely to deliver the necessary housing / is over-reliant on existing commitments / brownfield sites</li> <li>• The contribution of windfall sites is over-estimated;</li> </ul> | <p>Comments noted. Comments regarding the Plan period, housing provision, the Standard Method, the 'buffer', unmet needs, affordability and land supply are addressed in the topic based sections below.</p> <p><b>Recommended response:</b> No change.</p> |

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| <p>ANON-KSAR-NK2A-W<br/> BHLF-KSAR-N8ZF-Q<br/> BHLF-KSAR-N8B3-C<br/> BHLF-KSAR-N868-5<br/> BHLF-KSAR-N8BS-C<br/> BHLF-KSAR-N8ZD-N<br/> BHLF-KSAR-N8ZZ-B<br/> BHLF-KSAR-N8Z1-2<br/> BHLF-KSAR-N87Z-8<br/> BHLF-KSAR-N8TN-S</p> <p><b>(29 comments)</b></p>  | <ul style="list-style-type: none"> <li>• The requirement should not include the SDNP / this element may not be delivered;</li> <li>• The Plan period / end date should be changed;</li> <li>• The distribution of development / spatial areas should be adjusted</li> </ul> <p><b>Each of these issues are addressed in more detail in the relevant topic based sections below.</b></p>  |   |
| <p>ANON-KSAR-NK79-T<br/> ANON-KSAR-NKHU-7<br/> Oliver's Battery Parish Council<br/> ANON-KSAR-NK47-N<br/> ANON-KSAR-NKDW-5<br/> Littleton &amp; Harestock Parish Council<br/> ANON-KSAR-NKAP-U<br/> ANON-KSAR-N8YU-5<br/> ANON-KSAR-NKXV-R<br/> ANON-KSAR-NKFQ-1<br/> Upham Parish Council<br/> ANON-KSAR-N8GG-5<br/> BHLF-KSAR-N8RU-X</p> <p><b>(10 comments)</b></p> | <p>The Local Plan housing requirement should not be dictated by Government / the standard method and the Local Plan housing requirement should be decreased / fewer sites allocated for one or more of the following reasons:</p> <ul style="list-style-type: none"> <li>• Government has announced the intention to allow local circumstances to be taken into account / update the standard method;</li> <li>• The method is based on outdated information and does not take account of more recent projections / the 2021 Census;</li> <li>• There should be a larger allocation to the SDNP</li> <li>• The Council should not be required to meet the unmet needs of other authorities.</li> </ul> <p><b>Each of these issues are addressed in more detail in the relevant topic based sections below.</b></p> | <p>Comments noted. Comments regarding housing provision, the Standard Method, unmet needs and the National Park are addressed in the topic based sections below.</p> <p><b>Recommended response:</b> No change.</p> |
| <p><b><u>Plan Period / End Date</u></b></p>  |  |   |



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| ANON-KSAR-NKJV-A<br>ANON-KSAR-NKME-V<br><br><b>(2 comments)</b> | <p>The plan period should not start at 2019 but rather the year of plan submission so that the Local Housing Need calculation is then valid for a two year-period. Including completions from 2019 is not the correct approach.</p> <p>If there are any delays to the plan going forward it may be necessary to allow for an additional year or two of growth and Winchester need to think what sites would be included to meet the additional housing required.</p> | Comments noted, see general response on this issue below.<br><b>Recommended response:</b> Amend the Local Plan period from <del>2019-2039</del> to <u>2020-2040</u> . |
| BHLF-KSAR-N8BS-C  | The plan period adheres with the minimum recommended period of 15-years as specified within the NPPF and is therefore appropriate and proportionate.   | Comments noted.<br><b>Recommended response:</b> No change.  |
| ANON-KSAR-N8QS-U  | The plan looks ahead to 2039 based on a 15 year horizon after an adoption in 2024, but this allows for no slippage in a Local Development Scheme that has already been delayed. It would be prudent to look ahead to 2040, to positively plan to meet development needs and allow for likely delays to the adoption date into 2025.  | Comments noted, see general response on this issue below.<br><b>Recommended response:</b> Amend the Local Plan period from <del>2019-2039</del> to <b>2020-2040</b> . |

General Response to Plan Period / End Date Issues

The NPPF expects that ‘strategic policies should look ahead over a minimum 15 year period from adoption’ (NPPF para 22) and should be reviewed every 5 years. There is nothing in the NPPF, Planning Practice Guidance or PAS Local Plan Toolkit advising on the length of the Plan period or its start date.

Work on the new Local Plan commenced in 2018, 5 years from the adoption of the Winchester District Joint Core Strategy. This also coincided with the updating of the NPPF and introduction of the Standard Method for assessing local housing need. A 20-year plan period was expected, so as to give 15 years from plan adoption. This period is typical of plan periods in Winchester District and across many other authorities.

Work on the Local Plan has been delayed for various reasons, particularly uncertainty about Government consultation proposals for major changes to the local plan system, ongoing changes to the National Planning Framework, Written Ministerial Statements and

other key issues such as the need for development to demonstrate nutrient neutrality (both nitrates and phosphorous). The Regulation 18 Local Plan envisaged adoption in 2024 so applied a 2039 end date to provide 15 years from adoption. The start date of 2019 would maintain a 20-year plan period (2019-2039). This also allowed the high levels of housing development achieved over recent years to be taken into account. The cumulative Standard Method housing need since the start of the plan period (2019/20 – 2021/22) was 2,023 dwellings whereas net dwelling completions in the same period have been 2,718 dwellings (an 'over-provision' of 695 dwellings).

Some development interest representations suggest that the Plan period should be extended to 2040 or 2041 and / or that its start should not be 'backdated'. Given changes to the Local Plan programme (see Local Development Scheme 2023), it is agreed that the Plan period will need to be extended to 2040 to allow 15 years from adoption. It is also necessary to update the start date to 2020, so as to maintain a 20-year Plan period. This is also important to allow the Council's recent good performance in terms of housing completions to be taken into account, as there is no specific provision in the NPPF or Planning Practice Guidance for past over-supply to be taken into account and this would otherwise be lost.

**Recommended response:**

Amend the Local Plan period from ~~2019-2039~~ to **2020-2040** in the following locations:

- Front Cover
- Diagram, page 10
- Table H1 – Standard Method Annual Need, page 228
- Paragraph 9.16, page 229
- Table H2 – Housing Need and Provision, page 229
- Policy H1, page 230
- Paragraph 9.21, page 231,
- Diagram – Effect of Phasing on Housing Trajectory, page 231
- Policy H2, page 232,
- Table H3 – Delivery of Small Housing Sites, page 232,
- Policy H3, page 233
- Table H3 – Traveller Pitch / Plot Needs by 4 Year Period, page 260
- Table – Winchester Town Housing Sources, page 325
- Table – South Hampshire Urban Areas Housing Sources, page 381
- Table – Market Towns and Rural Area Allocations, pages 405 and 406
- Table – Bishops Waltham Housing Sources, page 407

- Table – New Alresford Housing Sources, page 425
- Table – Colden Common Housing Sources, page 439
- Table – Denmead Housing Sources, page 459
- Table – Kings Worthy Housing Sources, page 457
- Table – Wickham Housing Sources, page 465
- Table – Hursley Housing Sources, page 481
- Table – Otterbourne Housing Sources, page 485
- Table – South Wonston Housing Sources, page 491
- Table – Sutton Scotney Housing Sources, page 499
- Table – Swanmore Housing Sources, page 501
- Table – Waltham Chase Housing Sources, page 507

**Use of / Changes to the Standard Method**

ANON-KSAR-NKJ4-8  
 ANON-KSAR-N85K-Q  
 HLF-KSAR-N8RJ-K  
 BHLF-KSAR-N8ZD-N

**(4 comments)**

The applicable Standard Method annualised figure will need to be fixed when the Plan is submitted, consistent with the Planning Practice Guidance (PPG). The housing figures set out in the draft Local Plan should be viewed as minimum figures and the NPPF requires at least a 5% buffer to be applied. There is a clear case for exceeding the minimum Standard Method-derived minimum requirement including the need to provide for unmet need from within PfSH and to address the worsening levels of housing affordability and related impacts.

Comments noted, see general response on this issue below. The 5% buffer required by NPPF paragraph 74 related to the demonstration of a 5-year land supply, not to the Local Plan housing requirement. In any event, this provision has been removed in the latest (December 2023) NPPF. Matters such as unmet needs and affordability are considered in separate sections below.

**Recommended response:** Amend the Local Plan to update references to the Standard Method as necessary at the time of preparing the Regulation 19 Plan.

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| <p>ANON-KSAR-NKJV-A<br/>ANON-KSAR-NKME-V<br/>ANON-KSAR-N81F-E</p> <p><b>(3 comments)</b></p> | <p>The standard methodology provides a “minimum” figure of housing need and is a “starting point”. This particularly applies in respect of the need to contribute to meeting the Partnership for South Hampshire strategy. To ensure that the draft plan is flexible and positively prepared the realistic need for homes above these targets should be acknowledged and the Council should consider providing additional development, beyond that set out in the emerging plan to meet the unmet needs of neighbouring authorities.</p>   | <p>Comments noted, see general response on this issue below. Matters such as unmet needs are considered in separate sections below.<br/><b>Recommended response:</b> No change.</p>                                 |
| <p>BHLF-KSAR-N8B3-C<br/>BHLF-KSAR-N868-5</p> <p><b>(2 comments)</b></p>                      | <p>Object to the amount of development proposed because the local plan seeks to only meet the identified needs and apply the minimum buffer possible. This is not positive planning and the chronic level of housing affordability requires urgent attention. The Council must deliver more new homes than the ‘minimum’ to help the affordability crisis.</p>   | <p>Comments noted, see general response on this issue below. Matters such as unmet needs and affordability are considered in separate sections below.<br/><b>Recommended response:</b> No change.</p>               |
| <p>ANON-KSAR-N8M8-V<br/>BHLF-KSAR-N87Z-8</p> <p><b>(2 comments)</b></p>                      | <p>The Standard Methodology is the starting point for determining a housing requirement for the district, not a ‘target’. The Council is properly applying the methodology in this regard and is supported in this stage of determining what the overall housing requirement ought to be. Other factors should be taken into consideration, including constraints, the amount of land available, and any need under the duty to cooperate. It is for local authorities to determine how many homes to plan for and where homes should be located.</p> <p>Winchester is in the top 5% of least affordable districts and it is becoming harder for people to find a suitable house they can afford and this should be a ‘key priority’. The affordability adjustment applied to the SM formula will not lead to a solution in a district such as Winchester. The</p> | <p>Comments noted, see general response on this issue below. Matters such as unmet needs, the ‘buffer’ and affordability are considered in separate sections below.<br/><b>Recommended response:</b> No change.</p> |

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|  | <p>Council should incorporate an upward adjustment to address problems of affordability and make strategic scale allocations with strict affordable housing delivery requirements. This would require an uplift in the level of housing directed to Winchester Town, to address unmet housing needs from the PfSH area and to facilitate reductions in commuting flows into Winchester Town. A contingency should also be included for non-implementation.</p>  |   |
| <p>ANON-KSAR-NKS3-G<br/>Bishops Waltham Parish Council</p> | <p>How has WCC calculated the buffer of 1,450 dwellings? Is this sufficient? What would happen if the allocation for the Sir John Moore's barracks does not proceed?</p> <p>Support the chosen strategy for new homes, particularly the phasing of housing on a greenfield site to the later stages of the Local Plan because this allows facilities, services and traffic issues to be addressed before more housing. In particular Bishop's Waltham requires a new Healthcare site.</p> <p>Welcome that brownfield sites will be utilised before greenfield developments and the policies for development to be within the defined settlement boundary.</p> | <p>Comments noted, see general response on this issue below. Matters such as the 'buffer', land supply and delivery are considered in separate sections below.</p> <p><b>Recommended response:</b> No change.</p>   |
| <p>ANON-KSAR-NKFQ-1<br/>Upham Parish Council</p>           | <p>When Government policy is in a state of flux neighbouring local authorities are holding back their local plans, it seems surprising and rash to set a 15,629 housing target with all the implications for a 5 year land supply. Support the need to provide the right amount of housing in the right place, but the following factors should be considered.</p> <p>The basis for the calculation is the 2014 household projections which are widely regarded as out of date, it would appear more logical to use the 2021 census. Up to</p>  | <p>Comments noted, see general response on this issue below. Matters such as housing land supply are considered in separate sections below.</p> <p>The ability to demonstrate a 5-year land supply is dependent on adequate land being brought forward, not simply on the overall housing requirement.</p> <p><b>Recommended response:</b> No change.</p> |

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|                  | <p>date data indicates a lower demand for housing, particularly in Southampton, so no need to include a contribution to for Southampton within the Winchester figures.</p> <p>The higher the annual target the more vulnerable the District becomes to 5 year land supply which would lead to a loss of control of where new developments come forward across the district and render the 2030 net zero carbon target more difficult to achieve.</p>   |  |
| ANON-KSAR-NK21-D | <p>It is important that the housing requirement figure does not fall below the standard method figure at the point of plan submission, allowing for the buffer as included in the policy which we would support.</p>   | <p>Comments noted, see general response on this issue below. Matters such as the 'buffer' are considered in separate sections below.<br/><b>Recommended response:</b> No change.</p> |
| ANON-KSAR-N8M7-U | <p>Policy H1 should be amended to state that the housing requirement is the minimum number of homes to be planned for.</p> <p>Policy H1 is based on the minimum need established using the standard method of 14,178 new homes over the plan period plus an additional 'buffer'. We welcome the higher housing requirement, but this should not be referred to as a buffer. This word is most often used to indicate additional homes being delivered between the housing requirement and supply, whereas the Council use the term with regard to the increase to take account of changes to the standard method or unmet needs from neighbouring areas. The Plan then states that there is no need for a buffer to allow for non-delivery. Using the same term to describe an uplift to the requirement and additional supply has the potential to cause confusion.</p> | <p>Comments noted, see general response on this issue below. Matters such as the 'buffer' are considered in separate sections below.<br/><b>Recommended response:</b> No change.</p> |

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| ANON-KSAR-N85W-3 | <p>The Standard Method figure has been retrofitted to reflect previous calculations and should be recalculated so that the same figure for the whole plan period is used. This amounts to an increase of 130 homes to 14,300 as a baseline.</p> <p>More flexibility is required - the current approach relies on four sites delivering over half of the housing target at the same rates as currently proposed. The market downturn will slow rates, so a more diverse supply of sites is required with an increased housing target, including smaller sites which can contribute to early delivery. A 10%-20% increase is proposed to take the housing target to 15,730-17,160 dwellings.</p> | <p>Comments noted, see general response on this issue below. The Local Plan's development strategy and site allocations are considered in relation to comments on other policies.<br/> <b>Recommended response:</b> Amend the Local Plan to update references to the Standard Method as necessary at the time of preparing the Regulation 19 Plan.</p> |
| ANON-KSAR-N8Q1-S | <p>The Council's local housing need is not calculated in accordance with policy and guidance. The standard method provides authorities with an annual number which can be applied to the "whole" plan period, using the latest inputs. It is recognised that the method outputs may change and it is only once the plan is submitted that a specific figure can be relied upon.</p> <p>Table H1 applies older standard method figures to past years, but if the current standard method figure were applied to the 20-year plan period, the housing need element would be 14,300 homes, not 14,178.</p>  | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> Amend the Local Plan to update references to the Standard Method as necessary at the time of preparing the Regulation 19 Plan.</p>  |
| ANON-KSAR-NKJC-Q | <p>The significant level of unmet housing need in adjoining LPAs ought to be a 'key issue' in criterion iii. The 'Standard Method' is only a starting point, and may need to be uplifted to improve access to affordable housing, support other growth objectives, or assist adjoining LPAs meet unmet needs.</p>  | <p>Comments noted, see general response on this issue below. Matters such as unmet needs, the 'buffer' and affordability are considered in separate sections below.<br/> <b>Recommended response:</b> No change.</p>   |

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|                  | <p>There is likely to be a need to adjust the housing requirement upwards and allocate further supply. In addition, a significant proportion of new allocations comprise complex brownfield sites that have taken many years to come to fruition, with development partners still to be agreed. There is a need for a contingency or slippage allowance which should be accounted for in the housing land supply, with additional allocations.</p>  |  |
| ANON-KSAR-N83Q-U | <p>The Plan relies on the standard methodology for identifying local housing need as a target rather than the starting point position set out in National Policy. It fails to provide any affordability uplift to address the significant and worsening affordability of housing within Winchester district, one of the top 5% least affordable areas of the country (outside London and Isles of Scilly). The Plan fails to provide the minimum 5% buffer against even the standard methodology housing need figure to ensure choice and competition in the market for land as required by National Policy. It inadequately provides for the established unmet housing need in the wider PfSH area and therefore the Council fails in its Duty to Cooperate.</p> | <p>Comments noted, see general response on this issue below. Matters such as unmet needs and affordability are considered in separate sections below. The 5% buffer required by NPPF paragraph 74 related to the demonstration of a 5-year land supply, not to the Local Plan housing requirement. In any event, this provision has been removed in the latest (December 2023) NPPF.<br/><b>Recommended response:</b> No change.</p> |
| ANON-KSAR-N85J-P | <p>Support in principle that policy H1 recognises housing of various scales, types and tenures are required and that a contribution to unmet need in neighbouring areas is required. However, the figure of 715 dwellings per annum is the minimum housing need and there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method.</p> <p>WCC has included a buffer on top of the standard methodology and we support this approach but consider the buffer figure should be increased. Affordability is one reason</p>  | <p>Comments noted, see general response on this issue below. Matters such as unmet needs, the 'buffer' and affordability are considered in separate sections below.<br/><b>Recommended response:</b> No change.</p>  |



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|                  | <p>that a higher housing number should be sought in the plan. The affordability ratio is currently 14.14 it is highly likely that the affordability ratio will increase prior to adoption of the draft Local Plan, resulting in a higher standard methodology figure for Winchester. Therefore, there should be more emphasis that this is a minimum figure, and an uplift should be included in part reflect the poor affordability in Winchester, which is likely to increase.</p>   |   |
| ANON-KSAR-N81U-W | <p>The Plan correctly identifies a minimum housing need for 715 homes per annum from 2022 onwards, which reflects historic levels of delivery up to 2022 but it is necessary to add completions (2019-2022) to the need from April 2022. In 2019-22 2,666 homes were completed which, when added to the standard method of 12,155 homes (715 x 17) over the remaining 17 years, provides for a minimum local housing need of 14,828 homes over the plan period rather than 14,178 identified in the Plan.</p> <p>The Future Local Housing Need and Population Profile Assessment, the Employment Land Study and the SHMA assess housing needs over the period to 2036 and rely upon previous results of the standard method. These will need to be updated and the Plan amended as appropriate.</p> <p>The standard method provides only the minimum number of homes needed with other factors needing to be considered, including the needs of particular groups, affordable housing needs, the need to support economic growth and the unmet needs of other LPAs. The NPPF requires that planning policies reflect the needs of students and the Local Plan recognises that the University of Winchester and the</p> | <p>Comments noted, see general response on this issue below. Past completions are a source of housing supply, not a component of need. The Plan provides for Standard Method needs from the start of the Plan period (Table H1).</p> <p>The Future Local Needs Assessment has been superseded by the actual Standard Method figure. This remains at a similar level and it is not realistic to update the various evidence studies annually to reflect limited changes to the Standard Method figure. A focussed update of the SHMA has been undertaken and published as part of the evidence base.</p> <p>The Standard Method is set by Government and provides an overall figure for housing needs. It is not clear how the respondent has derived the suggested increases in student</p> |

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|  | <p>Winchester School of Art will be expanded, which will count towards the housing requirement.</p> <p>The standard method is informed by the 2014 based household projections which take no account of the trends and growth of the institutional population. Therefore proposed growth in the institutional population will not be accounted for within the standard method. The 2014 based household projections assume that there will be no change in the institutional population so a housing requirement which is based upon the standard method does not make provision for the planned growth in student numbers. Students living in communal establishments are not accounted for in the standard method and the housing requirement will need to be uplifted to provide for these needs. As a broad indication, it will be necessary for the housing requirement to be at least c.1,064-1,114 greater than the minimum identified by the standard method to meet the need for student accommodation. Otherwise student accommodation would be included in the supply but excluded from the requirement, leading to an unbalanced assessment and fewer homes than are necessary.</p> <p>It will be necessary to assess the growth aspirations of the higher education establishments and to set a housing requirement in excess of the standard method to meet the accommodation needs of students. On the basis of the available information, this would require at least 1,064 additional homes.</p> <p>The Employment Land Study assesses the need for employment land on the basis of the baseline forecast of</p> | <p>accommodation, but if an authority seeks to 'deconstruct' the Standard Method and recalculate the way the figure is derived it would amount to developing its own methodology. This would require 'exceptional circumstances' to be demonstrated, as the Government expects the Standard Method to be used to calculate housing need (NPPF paragraph 61) and advises that student accommodation can be counted towards supply.</p> <p>Matters such as unmet needs, economic needs, the 'buffer' and affordability are considered in separate sections below.</p> <p><b>Recommended response:</b> No change.</p> |
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|  | <p>Experian Economics. The baseline forecasts of Experian are a 'business as usual' scenario, and do not represent a particularly aspirational rate of economic growth. Also, the Employment Land Study pre-dates the announcement of the Solent Freeport which is intended to attract extra investment into the sub-region, creating over 16,000 new jobs. This significant new consideration will need to be taken into account and the evidence base updated.</p> <p>Even with a 'business as usual' scenario, the Employment Land Study suggests that an additional 12,500 jobs will be supported whereas the Future Local Housing Need and Population Profile Assessment suggests that the previous results of the standard method would only support an increase of 11,386. All of the evidence will need to be updated to reflect the proposed housing requirement, but it appears likely that an insufficient level of housing will be provided to support employment growth let alone meet the greater aspirations in this sub-region. The NPPF requires planning policies to address potential barriers to investment such as inadequate supply of housing and it will therefore be necessary to assess whether the level of housing proposed will be sufficient to support economic growth.</p> <p>There is a minimum local housing need for 14,828 homes over the plan period. Based on the planned expansion of the University of Winchester and Winchester School of Art there is a need for an additional 1,064 to 1,114 homes to meet the accommodation needs of students, providing for a minimum need of 15,892 to 15,942 homes. Additionally, even on the unlikely assumption that the proposed contribution of 1,450 homes towards unmet needs is</p> |  |
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|                  | <p>sufficient there would then be a need for 17,342 to 17,392 homes. There is also a need for a significantly greater number of homes (in excess of 20,000 homes) to respond to the need for affordable housing. There is clearly a need for at least but significantly more than 17,342 to 17,392 homes over the plan period.</p> <p>However, the supply should provide for sufficient contingency to accommodate non-delivery and delays, with the 'buffer' to be applied normally at least 5% if not 10%. The draft Plan provides no such 'buffer' and based on the preceding analysis, a conservative 5% buffer above the need for at least 15,892 to 15,942 homes (excluding unmet needs) would result in a minimum requirement for 16,687 to 16,739 homes (excluding unmet needs). Assuming that the contribution of 1,450 homes towards unmet needs is sufficient this would result in a minimum housing requirement for 18,137 to 18,189 homes. This takes no account of the need for affordable housing which would suggest that the housing requirement needs to be c.20,000 homes.</p> <p>The current wording which proposes a housing requirement "of about 15,620 dwellings" is not justified or consistent with the evidence base and should be amended to provide a minimum housing requirement.</p> |  |
| ANON-KSAR-NKZ5-S | <p>It is understood there is an expectation that the standard method will be used and any other method will be used only in exceptional circumstances. The annual build rate in the Plan does not state any justification set against the impact of the biodiversity and climate crisis? Where is the modelling to show impact scenarios of the build rate,</p>   | <p>Comments noted, see general response on this issue below.</p> <p>Government expects the Standard Method to be used to plan for housing needs. The Plan's policies have been</p> |

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|                  | typology of buildings, infrastructure load on the environment, land use set against the need to mitigate and adapt the existing district for a sustainable future? More explanation is needed to justify the figures in the current exceptional environmental circumstances.   | subject to an Integrated Impact Assessment and Habitat Regulations Assessment which cover their impact on these matters.<br><b>Recommended response:</b> No change. |
| ANON-KSAR-NK79-T | The Government has announced that targets for individual local authorities can be impacted by designations such as National Parks, Exceptional circumstances mean that the standard methodology should not be followed, as much of the district is within the SDNP, the 2021 Census should be used, and the standard method may change. A much more realistic figure would be 550 dpa to allow for the SDNP and updated demographic information. | Comments noted, see general response on this issue below.<br><b>Recommended response:</b> No change.  |
| ANON-KSAR-NK47-N | Government has reviewed its decision on required housing numbers and this should now be reconsidered in Winchester, particularly in respect of the SHELAA sites.   | Comments noted, see general response on this issue below.<br><b>Recommended response:</b> No change.  |
| ANON-KSAR-NKXV-R | Given the policy changes coming from the Department of Levelling up with regards to housing provision we should amend housing provision to what is actually needed (rather than using the government's targets plus a contribution for other areas plus a safety net) and using the most recent Census data. This whole section should be paused.  | Comments noted, see general response on this issue below.<br><b>Recommended response:</b> No change.  |
| ANON-KSAR-N81T-V | As the Govt top down approach to targets is likely to be abolished WCC need to consider how this will affect the Local Plan approach to targets.   | Comments noted, see general response on this issue below.<br><b>Recommended response:</b> No change.  |
| BHLF-KSAR-N8RU-X | There are widespread concerns about WCC's proposed housing numbers and imminent Government changes. Concerns include use of old household data, inclusion of a 10% buffer may not be appropriate, and PfSH will report on its strategy in 2023 when accommodating some of its  | Comments noted, see general response on this issue below. Matters such as unmet needs and the 'buffer' are considered in separate sections below.                   |

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|                  | <p>allowance may be unnecessary. The data used is a broad estimate, not evidence based, which could potentially render the proposed plan 'unsound' and/or 'unjustified'. East Hampshire &amp; Basingstoke &amp; Deane have announced they intend to examine the true level of local need for housing.</p> <p>In MTRAs infrastructure would need major upgrading to cope with significant new housing, with damaging impacts of construction traffic, water pollution/excess abstraction from rivers and damage to heritage, biodiversity, habitats, landscapes, etc. There are significant brownfield/under-used sites in Winchester Town and large sites in Winchester Town can meet the concept of '15 min neighbourhoods'. Regeneration is vital for its own sake and to avoid degrading the countryside.</p>  | <p>The impacts of development and infrastructure requirements are considered when site allocations are made, with appropriate requirements included as necessary.</p> <p><b>Recommended response:</b> No change.</p> |
| BHLF-KSAR-N8BD-W | <p>The City Council has acknowledged there are significant uncertainties in calculating housing numbers and has introduced a 10% buffer, mainly because of neighbouring authorities not being able to meet their housing needs as calculated by the Standard Method. Authorities including Winchester may be asked to accept extra housing under the duty to co-operate.</p> <p>It seems the Government will revise its directions on the way housing numbers are calculated which could be by changes to the factors that produce the Standard Method and/or more flexible discretion on local factors. The Standard Method is based on 2014 projections of population growth and does not take account of the 2021 Census. This could lead to changes in district housing numbers. Until it is clear what revisions are made to government guidance and</p> | <p>Comments noted, see general response on this issue below. Matters such as unmet needs and the 'buffer' are considered in separate sections below.</p> <p><b>Recommended response:</b> No change.</p>              |

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|                  | what the consequences are, the Local Plan Process should be paused.  |   |
| ANON-KSAR-N8GG-5 | <p>Build only 550 Houses per year for the Winchester City Council area. The Government is reducing UK housing targets. England only built 200,000 houses in 4 out of 20 years, any Government target of 300,000 houses could not be delivered.</p> <p>Applying 15,600 homes over 20 years would mean 780 dwellings would need to be built each and every year. The "Authority Monitoring Report" shows over the last 10 years the Council has achieved an average of only 551 dwellings per year and only exceeded 800 houses on two occasions. "Help to Buy" subsidising house purchase for a few months was the reason House-Purchase exceeded 800 houses that year.</p> <p>Winchester City Council need to set realistic and lower housing targets. Current "Local Plan" housing targets cannot be met. Separate objections made to Courtenay Road, St Peters Car Park, Sir John Moore Barracks, and Bushfield Camp site allocations.</p> | <p>Comments noted, see general response on this issue below.</p> <p>Recent completion levels show that very high numbers can be achieved, with the 2023 Authorities Monitoring Report showing completions of over 1,000 dwellings in 2021-22 and 2022-23, and more than 800 in 2 of the 3 previous years.</p> <p>Matters such as specific site allocations are addressed in the sections on those policies.<br/><b>Recommended response:</b> No change.</p> |

General Response on Use of / Changes to Standard Method Issues

The Council has published the Housing Topic Paper which deals with this matter in detail at Chapter 3. The following provides a summary.

The NPPF advises that *'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance.'* It acknowledges that *'there may be exceptional circumstances.... which justify an alternative approach'* which is required to *'reflect current and future demographic*

*trends and market signals*' (NPPF para 61). The Regulation 18 Local Plan uses the Standard Method (SM) as its starting point (Reg 18 Plan, para 9.14).

The Council has not sought to demonstrate that *'exceptional circumstances.... justify an alternative approach'* to the SM and is not aware of any other local plan that has sought to do this. However, the previous Government's December 2022 consultation on planning reforms stated that: *'local authorities will be expected to continue to use... the standard method, to inform the preparation of their plans; although the ability to use an alternative approach where there are exceptional circumstances that can be justified will be retained. We will, though, make clearer in the Framework that the outcome of the standard method is an advisory starting-point to inform plan-making – a guide that is not mandatory – and also propose to give more explicit indications in planning guidance of the types of local characteristics which may justify the use of an alternative method, such as islands with a high percentage of elderly residents, or university towns with an above-average proportion of students'* (Chapter 4, paragraph 8).

The previous Government's consultation was published during the Regulation 18 consultation period and resulted in some comments suggesting that the Government had / would abolish housing targets and that a lower requirement should apply, or that the Plan should be delayed until a revised NPPF is published. These responses refer to matters such as the SM using out of date (2014) household projections, the pandemic, the 2021 Census results and constraints such as the South Downs National Park, to justify a delay or use of an alternative method.

The text of the Government consultation was somewhat confusing, as it referred to *'exceptional circumstances'* for alternative approaches, but then suggested the SM will be *'an advisory starting point'*. The NPPF has now been revised (December 2023) and confirms that *'strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area....'* This reflects the earlier Government consultation and has been used by some to suggest a delay or lower housing requirement. However, paragraph 67 is cross-referenced, which refers only to reasons why the requirement may be higher than the SM, and paragraph 61 continues to refer to the SM determining the *'minimum'* number of homes needed and *'exceptional circumstances'* being needed to justify an alternative approach. The only exceptional circumstance referenced relates to the particular demographic circumstances of the area such as *'islands with no land bridge that have a significant proportion of elderly residents'*.

A major new area of work would be required to develop an alternative approach and this would result in long delays to the Local Plan process. The outcome of such work is uncertain and may not be significantly different to the SM. Government has re-emphasised that getting up to date plans in place *'should be seen as a priority'* (NPPF paragraph 1). The new Government elected



in July 2024 has indicated its intention to reintroduce housing targets. Using an alternative to the SM may not, therefore, be feasible, would require a much more rigorous examination of the housing requirement, and would not warrant the additional cost and delay involved, especially when the Plan is able to meet the level of need indicated by the SM.

Table H1 of the draft Local Plan calculated the SM requirement based on the figures for each year of the Plan period so far (total of 14,178 dwellings). Some comments suggest that the (then) current SM figure of 715 dwellings should be applied to the whole 20-year plan period (total of 14,300 dwellings). The SM has been updated since the Regulation 18 Local Plan (currently 676 from March 2024), so applying the current SM figure over the whole Plan period would now give a lower figure than the method used in the Regulation 18 Local Plan. However, the difference in numbers is limited and it would seem more justified to apply the known SM figures for previous years, rather than use the current figure over the whole 20-year plan period.

Various respondents suggest that the SM number will need to be fixed on submission of the Plan, or suggest the SM figure should be increased to allow for future changes. It is agreed that the SM figure will need to be fixed on submission of the Plan, but the Planning Practice Guidance recognises that it may change up to this point: *'the housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities. However, local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination'* (PPG ID: 2a-008-20190220). Therefore, there is no merit in increasing the SM figure to try to pre-judge future changes, as the PPG allows it to be updated until the Plan is submitted.

The SM figure has reduced in each year since the Regulation 18 Local Plan (715 dwellings per annum in the draft Local Plan), initially to 692 dpa and now to 676 dpa (March 2024). Current economic circumstances suggest wage inflation continues to exceed house price inflation, which could be expected to reduce the 'affordability multiplier' applied to the SM. Therefore, if anything, the SM figure may continue to fall slightly, but there is scope to update it as necessary.

Some comments question whether the plan would be *'positively prepared'* if it uses only the minimum SM figure. It is recognised that the SM figure is the minimum level of housing to be provided and that it may need to be increased to take account of unmet needs (NPPF para 61) or for other reasons. These potential reasons for increasing the SM are discussed in detail in the Housing Topic Paper, but it is concluded that the only matter that may justify an increase is the need to help meet other authorities' unmet needs under the 'Duty to Cooperate'. Therefore, the requirements of Government policy and advice have been followed and use of the SM should not result in the Plan failing the *'positively prepared'* test of soundness.

**Recommended response:** Amend the Local Plan to update references to the current Standard Method figure to refer to **676** dwellings per annum (rather than 715 dpa), in the following locations:

- Paragraph 9.3, page 224
- Paragraph 9.4, page 224
- Paragraph 9.14, page 228
- Paragraph 9.15, page 228
- Table H1 – Standard Method Annual Need, page 228
- Table H2 – Housing Need and Provision, page 229
- Paragraph 9.18, page 230
- Local Plan Glossary, page 557

**Duty to Cooperate / Meeting Unmet Needs / The ‘Buffer’**

ANON-KSAR-N85K-Q  
ANON-KSAR-NKUC-2  
BHLF-KSAR-N8RJ-K  
BHLF-KSAR-N8ZD-N

**(4 comments)**

The Local Plan infers that the buffer may be utilised to accommodate unmet needs arising in the PfSH area and, if so, no buffer has been provided to provide flexibility and boost affordable housing. Any buffer should be over and above any additional housing to meet the unmet needs of other Local Authorities.

The Integrated Impact Assessment Report has not fully examined options for increasing the housing requirement significantly above the 10% buffer. There is no consideration of an option where the Plan accommodates (for example) 3,000 – 5,000 additional dwellings to address a greater share of the unmet need arising within the PfSH area, which infers that WCC has pre-determined the amount of unmet need that it is prepared to accommodate. This may in turn undermine cross-boundary work being undertaken through the PfSH, not least the analysis of Strategic Development Opportunity Areas (SDOAs). These raise

Comments noted, see general response on this issue below.

The scale of unmet needs is not currently clear so there is no justification for testing figures which would be based on speculation about future levels of unmet need. The Council is required to consider ‘reasonable alternatives’ and such an approach would not be reasonable, justified or proportionate.

**Recommended response:** Amend the Local Plan to refer to an ‘**unmet needs allowance**’ for the PfSH area rather than a ‘buffer’ and update the scale of the allowance to reflect housing needs/provision.

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|  | <p>concerns in respect of soundness, and increases the risk that the Plan will be found not to comply with the 'Environmental Assessment of Plans and Programmes Regulations 2004'.</p>   |   |
| <p>ANON-KSAR-N8YM-W<br/>ANON-KSAR-NKAB-D<br/>ANON-KSAR-N81F-E</p> <p><b>(3 comments)</b></p> | <p>According to Table H2 the buffer is designed to accommodate for Standard Method changes and unmet need in neighbouring authorities. It is not clear how this buffer has been calculated or the split between unmet need and changes in the Standard Method. It is not apparent how this buffer relates to the need for a 10% buffer under NPPF which accounts 'for any fluctuations in the market during that year.'</p> <p>PfSH has identified an increased unmet need of 20,000 homes up to 2036. Much arises in the eastern part of the sub-region and it would be appropriate for the southern part of Winchester district to accommodate a significant element of this need, as a consequence of the geographical proximity but also the strategic road and rail links that exist.</p> <p>The Council need to be clear how the buffer has been applied, and how this relates to the 10% buffer under NPPF. The proposed buffer is insufficient to accommodate the requirements and in relation to the PfSH unmet need in particular, is likely to represent a significant level of under provision. It needs to be properly evidenced and broken down into what it is contributing to.</p> <p>The plan should set a higher housing target which reflects opportunities and capacity and should allocate all deliverable sites in sustainable locations, in accordance with the settlement hierarchy and opportunities to access</p> | <p>Comments noted, see general response on this issue below. The 5% buffer required by NPPF paragraph 74 related to the demonstration of a 5-year land supply, not to the Local Plan housing requirement. In any event, this provision has been removed in the latest (December 2023) NPPF.</p> <p><b>Recommended response:</b> Amend the Local Plan to refer to an '<b>unmet needs allowance</b>' for the PfSH area rather than a 'buffer' and update the scale of the allowance to reflect housing needs/provision.</p> |

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|   | <p>services, facilities and sustainable travel options. To ensure the plan is flexible and positively prepared the realistic need for homes above these targets should be acknowledged within the policy wording and associated allocations.</p> <p>15,620 homes would only meet the 'minimum' requirement calculated using the standard method and it is accepted good practice that a 10% contingency should be provided. West of Waterlooville has averaged about 100 dwellings per annum over the last 10 years, half of the expected 200 (dpa), highlighting uncertainty and under-delivery which can be partly addressed through a planned contingency approach.</p> <p>The economic downturn will undoubtedly impact future housing supply leading to further uncertainty and risks, including ongoing challenges for the capacity of the construction industry. These issues are most likely to impact on the viability of some of the existing permissions and allocations, which could impact on housing land supply. Even where local planning authorities are able to demonstrate a 5- year housing land supply the likely impact on the anticipated pipeline of delivery indicates the need for greater flexibility.</p> |  |
| <p>ANON-KSAR-N85J-P<br/>BHLF-KSAR-N8ZZ-B</p> <p><b>(2 comments)</b></p> | <p>Welcome the inclusion of a buffer but it is insufficient due to a variety of reasons. Since 2019 the Standard Methodology has changed by up to 50 dwellings per year and if a similar uplift were to happen again this would add an additional 850 dwellings from 2022, accounting for around 60% of the buffer. Since 2019 significant events have greatly impacted developments and planning, therefore, it is important to include sufficient flexibility to account of future changes. The</p>   | <p>Comments noted, see general response on this issue below. Comments regarding the Standard Method are considered in the section above. The 5% buffer required by NPPF paragraph 74 related to the demonstration of a 5-year land supply, not to the Local Plan housing</p> |

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|  | <p>buffer would be necessary simply to cover the potential for changes in housing requirement between the consultation and anticipated adoption of the Local Plan and a higher figure should be included to allow for the other purposes of the buffer, including PfSH unmet housing need.</p> <p>There is anticipated to be a significant unmet within the PfSH area of nearly 20,000 dwellings by 2036 and the situation is worsening rather than improving. There are limited opportunities within the PfSH area to provide the unmet need. The buffer of 1,450 is only 7.3% of the total unmet need in PfSH, whereas Winchester should in theory be looking to deliver around 33% of the shortfall (assuming it is divided equally between the three authorities with surplus or equilibrium), which would equate to around 6,621 dwellings. This is suggested as a minimum, given that there are currently significant challenges to delivery of dwellings in the PfSH area, including nutrients, affordability, increasing build costs and the potential for decreasing house prices which will affect viability. This increase is based only on the deficit PfSH calculated in 2022 and this position may worsen as was seen between 2021 and 2022.</p> <p>We question whether Sir John Moore Barracks will provide the 900 dwellings estimated, with potential for 150 dwellings to fall away from the supply. If the site does only come forward with 750 dwellings, this would account for 10.34% of the buffer. Furthermore, the potential for further delay to the release or retention of Sir John Moore Barracks has the ability to cause significant risk to the deliverability of housing supply. If due to unforeseen circumstances the allocation is further delayed or removed it would result in 62% of the</p> | <p>requirement. In any event, this provision has been removed in the latest (December 2023) NPPF. With regard to site capacity and delivery, site deliverability assessments have been undertaken for the site allocations, which have been amended where necessary.</p> <p><b>Recommended response:</b> Amend the Local Plan to refer to an ‘<b>unmet needs allowance</b>’ for the PfSH area rather than a ‘<del>buffer</del>’ and update the scale of the allowance to reflect housing needs/provision.</p> |
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|  | <p>buffer being utilised.</p> <p>The Local Plan has a high reliance on existing allocations carried forward of which 14 do not have planning consent, equating to 1,438 dwellings, or c.10% of the housing requirement. In addition, Winchester Central Regeneration Area should be included within the dwellings carried forward on existing allocations. These fifteen sites have a combined planned capacity of 1,738 dwellings, or c.11% Of the total housing requirement up to 2039. If unforeseen circumstances arose and CWR and Station Approach do not come forward (as seen historically), this would result in 34.8% of the buffer being utilised.</p> <p>The PPG sets out that local planning authorities will need to apply a minimum 10% buffer to their housing requirement to account for potential fluctuations in the market. As some of the dwellings proposed in the plan are already completed (1,517) 10% of the remaining housing requirement for the emerging Local Plan would equate to approximately 1,410 dwellings. The current proposed buffer of 1,450 dwellings would only just cover this requirement and we consider that the non-implementation rate should be part of the requirement, not included in any buffer.</p> <p>The proposed buffer needs to be significantly increased, which is the only way for sufficient flexibility to be included to allow for all the considerations above. Recent delivery of dwellings in Winchester demonstrates that the market is able to absorb a higher number of new dwellings and has market demand. Therefore, Winchester can deliver high</p> |  |
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|   | volumes and this should be planned for within the emerging Local Plan.  |   |
| ANON-KSAR-N8M8-V<br>BHLF-KSAR-N87Z-8<br><br><b>(2 comments)</b> | The buffer purports to serve a number of necessary functions but is targeted at meeting likely requests from authorities within the PfSH area, who will be unable to meet their housing needs. The latest calculation of unmet need within the PfSH area is around 20,000 dwellings in the period to 2036. This is an increase of around 7,000 dwellings on the previous SoCG and demonstrates the situation is becoming more acute. Winchester, Fareham, Test Valley, East Hampshire, and Eastleigh have potential to accommodate unmet needs. Winchester should be planning for a minimum of 2,600 additional dwellings, with evidence supporting a figure closer to 3,500, although a deficit of 20,000 would require potentially 7,000 additional dwellings. A non-implementation allowance of 1,430 dwellings should be added as the buffer is currently performing a variety of functions that it cannot realistically hope to satisfy. | Comments noted, see general response on this issue below.<br><b>Recommended response:</b> Amend the Local Plan to refer to an ' <b>unmet needs allowance</b> ' for the PfSH area rather than a 'buffer' and update the scale of the allowance to reflect housing needs/provision. |
| ANON-KSAR-NKJV-A<br>ANON-KSAR-NKME-V<br><br><b>(2 comments)</b> | Of particular relevance is the unmet need across the Partnership for South Hampshire (PfSH) area. In a proposed 2022 update to the SoCG, a shortfall figure of some 20,000 dwellings is identified. As Winchester City Council is one of the authorities responsible for jointly working to address this issue it should accommodate a greater proportion of this unmet need, with that part of the District within the PfSH area being an obvious location for additional allocations. The buffer of 1,450 dwellings is insufficient taking into account the latest calculations of the PfSH shortfall.  | Comments noted, see general response on this issue below.<br><b>Recommended response:</b> Amend the Local Plan to refer to an ' <b>unmet needs allowance</b> ' for the PfSH area rather than a 'buffer' and update the scale of the allowance to reflect housing needs/provision. |
| ANON-KSAR-NKHU-7  | Support the principle of a "buffer" but 1,450 dwellings is more than half of the additional 2,685 houses that would   | Comments noted, see general response on this issue below.   |

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| <p>Oliver's Battery Parish Council<br/>ANON-KSAR-NK47-N</p> <p><b>(2 comments)</b></p>                      | <p>otherwise need to be met by new site allocations. This increases the requirement for greenfield allocations across the district.</p> <p>The “buffer” includes an unspecified number from districts in PfSH and it is not clear which site allocations relate to the PfSH allowance but they should be in sustainable locations adjacent to the districts with the unmet requirement.</p>  | <p><b>Recommended response:</b> Amend the Local Plan to refer to an ‘<b>unmet needs allowance</b>’ for the PfSH area rather than a ‘buffer’ and update the scale of the allowance to reflect housing needs/provision.</p>  |
| <p>ANON-KSAR-NKHU-7<br/>Oliver's Battery Parish Council<br/>ANON-KSAR-N8YU-5</p> <p><b>(2 comments)</b></p> | <p>Government policy ends the ‘duty to co-operate’, so WCC should be able to resist housing from PfSH in Winchester district. WCC should review the “buffer” and reduce the overall numbers of new build in the Local Plan.</p>  | <p>Comments noted, see general response on this issue below.</p> <p><b>Recommended response:</b> Amend the Local Plan to refer to an ‘<b>unmet needs allowance</b>’ for the PfSH area rather than a ‘buffer’ and update the scale of the allowance to reflect housing needs/provision.</p> |
| <p>ANON-KSAR-NKG5-6<br/>Crawley Parish Council</p>  | <p>Take issue with the policy on the 'Duty to Cooperate' as part of the Partnership for South Hampshire and taking on housing allocations that other districts are unable to fulfil. WCC is under no obligation to take additional allocation and there is little point in building homes here for people working elsewhere in the county.</p> <p>WCC should delay Local Plan allocations to allow for changes in national planning policy including the method for calculating housing numbers, which are based on old data (2014). The government has scrapped plans to impose mandatory housebuilding targets on local councils, WCC should temper allocations accordingly.</p> | <p>Comments noted, see general response on this issue below.</p> <p><b>Recommended response:</b> Amend the Local Plan to refer to an ‘<b>unmet needs allowance</b>’ for the PfSH area rather than a ‘buffer’ and update the scale of the allowance to reflect housing needs/provision.</p> |
| <p>ANON-KSAR-NKDW-5<br/>Littleton and Harestock Parish Council</p>  | <p>It is not clear how the buffer of 1450 was arrived at and is premature as the PfSH authorities have yet to agree their housing requirement. WCC has to include a buffer in its 5-</p>   | <p>Comments noted, see general response on this issue below.<br/>Comments regarding land supply are</p>  |



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|                  | <p>year land supply of at least 5% so a further 15% seems unnecessary. WCC's approach has a significant impact on the five-year figure (819 dwellings annually when the 5% buffer from the NPPF is added) which is well in excess of the completions in recent years. Failure to deliver the requirement would lead to a shortfall which would make areas vulnerable to planning by appeal. The addition of a buffer of 1450 is not necessary or justified and the local plan requirement for 15628 should be reviewed.</p>  | <p>addressed in a separate section below. The 5% buffer required by NPPF paragraph 74 related to the demonstration of a 5-year land supply, not to the Local Plan housing requirement. In any event, this provision has been removed in the latest (December 2023) NPPF.<br/> <b>Recommended response:</b> Amend the Local Plan to refer to an '<b>unmet needs allowance</b>' for the PfSH area rather than a 'buffer' and update the scale of the allowance to reflect housing needs/provision.</p> |
| ANON-KSAR-N8M7-U | <p>The proposed uplift to the housing requirement is included to address either a change to the standard method or the unmet needs of neighbouring areas but this provides no certainty at this stage as to whether unmet needs will be addressed. It is evident from plan preparation across South Hampshire is that there are unmet needs arising in a number of areas and the latest evidence by the Partnership for South Hampshire indicated a shortfall of some 20,000 homes. Whilst Winchester cannot be expected to meet all of these needs it should develop a spatial strategy that would meet more than is currently being proposed.</p> <p>The Integrated Impact Assessment does not appear to test a strategy that goes beyond what is being proposed in the consultation document. Option 1A tests an option that delivers an additional 2,000 homes but states that it the Council expects the Partnership for South Hampshire Strategy to identify and deal with unmet need for housing.</p> | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> Amend the Local Plan to refer to an '<b>unmet needs allowance</b>' for the PfSH area rather than a 'buffer' and update the scale of the allowance to reflect housing needs/provision.</p>   |

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|                  | <p>Whilst the PfSH provides coordination on such matters it is the responsibility of the Councils to plan for unmet needs through their local plans, unless a joint local plan is prepared that will take on this responsibility. The Council must t examine strategies that contribute more towards the unmet needs of other areas and allocate more sites for development in the next iteration of the local plan.</p> <p>It will also be necessary for the Council to set out which council areas are to benefit from the additional homes being planned, to ensure that there is clarity as to the areas that will benefit and those where unmet needs remain.</p>   |  |
| ANON-KSAR-NKJ4-8 | <p>The Integrated Impact Assessment Report has not specifically examined options to increase the housing requirement over the 10% buffer proposed. The annual Standard Method figure is likely to rise and the 1,450 buffer could be used to accommodate the additional requirement, although there is no evidence to suggest that this would be sufficient. The evidence base contradicts the commentary within the draft Local Plan which infers that the buffer may be utilised to accommodate unmet needs in the PfSH area.</p> <p>The failure to consider options for increased levels of growth will make it more challenging to demonstrate that the Plan contributes to the achievement of sustainable development, which is likely to be a soundness issue. Similarly, the failure to evaluate higher housing requirements (as 'reasonable alternatives'), increases the risk that the Plan will be found not to comply with the 'Environmental Assessment of Plans and Programmes Regulations 2004', and other relevant legislation.</p> | <p>Comments noted, see general response on this issue below.</p> <p>The scale of unmet needs is not currently clear so there is no justification for testing figures which would be based on speculation about future levels of unmet need. The Council is required to consider 'reasonable alternatives' and such an approach would not be reasonable, justified or proportionate.</p> <p><b>Recommended response:</b> Amend the Local Plan to refer to an '<b>unmet needs allowance</b>' for the PfSH area rather than a '<del>buffer</del>' and update the scale of the allowance to reflect housing needs/provision.</p> |

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|                  | <p>There is no justification provided to explain how the figure of 1,450 was calculated. The figure of 1,450 represents the 10% buffer to the Standard Method housing requirement with the figure being used for both unmet need and to provide for flexibility. The figure of 1,450 to cover the unmet need appears an inadequately low proportion of the 20,000 shortfall across the PfSH area and it should be a significantly higher figure. Also, the figure of 1,450 is also doubling up as a 'buffer' for housing need and is too low to accommodate both unmet need and the 10% buffer.</p> <p>Winchester, which is largely unconstrained, should accommodate significantly more homes in addition to the 1,450 figure currently set out.</p> |  |
| ANON-KSAR-N8NY-X | <p>Object to the 'buffer' of 1,450 dwellings, which will encourage PfSH to rely on Winchester to provide extra houses, to the detriment of Winchester itself.</p>   | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> Amend the Local Plan to refer to an '<b>unmet needs allowance</b>' for the PfSH area rather than a 'buffer' and update the scale of the allowance to reflect housing needs/provision.</p> |
| ANON-KSAR-N85W-3 | <p>The approach to addressing unmet need of adjoining authorities is insufficient, only amounting to around 500 to 1,000 dwellings, when a figure of at least 6,000 homes (potentially more) is needed. This would bring the housing target up 21,730-23,160 dwellings. Consideration needs to be given to the identification of smaller sites to contribute to early delivery.</p>   | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> Amend the Local Plan to refer to an '<b>unmet needs allowance</b>' for the PfSH area rather than a 'buffer' and update the scale of the allowance to reflect housing needs/provision.</p> |
| ANON-KSAR-N8Q1-S | <p>Policy H1 does not identify a specific contribution to unmet needs within the housing requirement. The Plan does not</p>   | <p>Comments noted, see general response on this issue below.</p>   |

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|                  | <p>define this buffer as contributing to meeting those unmet needs; and also accounts for potential changes to the standard method figure. The true contribution to meeting PfSHs unmet need is not established and, as the Plan is currently drafted, could be zero.</p> <p>There is no assessment demonstrating that the buffer is a reasonable and justified figure and the unmet need figure has recently risen from 13,000 to 20,000 homes identified in the PfSH 'Statement of Common Ground 2022. The problem has increased in part because Winchester has 1,859 homes that were previously attributed to unmet need in the 2021 SOCG that are now being offset against needs generated outside the PfSH area - PfSH currently assumes that Winchester makes zero contribution to unmet need, as clarified in footnote 24 of the SoCG 2022.</p> <p>To be positively prepared and justified, and to discharge the Duty-to-Cooperate, the Council need to re-consider its approach in the context of the latest assessment of unmet needs from PfSH. The contribution should be specified in policy H1 as a separate requirement and could increase the requirement in the District by several thousand homes.</p> | <p><b>Recommended response:</b> Amend the Local Plan to refer to an '<b>unmet needs allowance</b>' for the PfSH area rather than a 'buffer' and update the scale of the allowance to reflect housing needs/provision.</p>  |
| ANON-KSAR-NKJC-Q | <p>Unmet needs should not be referenced as a 'buffer', it is the assessed uplift necessary to address the full need for housing in the area (particularly for affordable housing or growth objectives) and assist adjoining LPAs with unmet needs. The level of unmet housing need within PfSH has increased from 13,000 to 20,000 (2022 SoCG). This will need to be explored as part of Local Plan reviews in the area and is over and above that likely to arise through the review of the SDNP Local Plan.</p>   | <p>Comments noted, see general response on this issue below. Comments regarding affordability are addressed in separate sections below. <b>Recommended response:</b> Amend the Local Plan to refer to an '<b>unmet needs allowance</b>' for the PfSH area rather than a 'buffer' and update the scale of</p> |

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|                  | <p>In addition, adjustments for affordable housing may be needed, taking account of the plan's objectives to retain and attract an economically active workforce. These factors should be accounted for through the SA process, to arrive at a justified 'housing requirement'. A contingency 'buffer' or slippage allowance should be added to supply distinguishing between what is an 'uplift' to the standard method and what constitutes a supply 'buffer'.</p>  | <p>the allowance to reflect housing needs/provision.</p>   |
| BHLF-KSAR-N8ZF-Q | <p>The Council is correct to propose a buffer to accommodate changes to the future Standard Method calculation. The affordability ratio has increased over recent years, and is likely to continue to increase. However, it is unclear as to how much of the proposed buffer is derived from changes to the Standard Method, and the Plan should set this out.</p> <p>Support the proposal to accommodate unmet housing needs from neighbouring authorities, but the figure is not large enough to deal with the problem. PfSH identifies a shortfall across the area of 19,865 dwellings which should be addressed by the Councils. Winchester, offers the largest opportunity to help deliver this shortfall so the buffer should equate to a minimum 5,000 dwellings, to be distributed through the Southern Parish Market Towns and Large Rural Villages, and consideration of new Major Development Areas.</p> | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> Amend the Local Plan to refer to an '<b>unmet needs allowance</b>' for the PfSH area rather than a 'buffer' and update the scale of the allowance to reflect housing needs/provision.</p> |
| BHLF-KSAR-N8BS-C | <p>The plan must be positively prepared and meet objectively assessed needs using the standard method and any needs that cannot be met within neighbouring areas. It is not clear to what extent the plan is contributing towards unmet needs within PfSH where there is a shortfall of some 20,000 homes. There should be a 10% buffer to account for</p>  | <p>Comments noted, see general response on this issue below. The 5% buffer required by NPPF paragraph 74 related to the demonstration of a 5-year land supply, not to the Local Plan housing requirement. In any event, this</p>   |

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|                  | <p>fluctuations within the local market. If the 10% NPPF buffer of 1,417 is deducted from the figure presented (1,450) this yields a minimal residual figure of 33 dwellings that is the contribution towards PfSH.</p> <p>It is regrettable that there is no Statement of Common Ground agreed by the Council between the PfSH agreeing distribution of the shortfall and how much of this is to be met within Winchester. The Council should reconsider its current approach.</p>  | <p>provision has been removed in the latest (December 2023) NPPF.<br/> <b>Recommended response:</b> Amend the Local Plan to refer to an ‘<b>unmet needs allowance</b>’ for the PfSH area rather than a ‘<b>buffer</b>’ and update the scale of the allowance to reflect housing needs/provision.</p> |
| BHLF-KSAR-N8Z1-2 | <p>It is unclear how the buffer has been quantified and this calculation needs to be evidenced, as well as identifying which neighbouring authorities unmet need is being provided and the amount for each authority. It is not appropriate to address unmet needs via an arbitrary figure.</p> <p>The Council should also consider how it refers to the increase in housing numbers, as ‘buffer’ has differing connotations and the Standard Method represents the minimum number of homes to be planned for.</p>   | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> Amend the Local Plan to refer to an ‘<b>unmet needs allowance</b>’ for the PfSH area rather than a ‘<b>buffer</b>’ and update the scale of the allowance to reflect housing needs/provision.</p>      |
| ANON-KSAR-NKKF-U | <p>The number of dwellings proposed is too low, with a heavy reliance on a few large strategic sites and no buffer for the non-delivery of existing permitted sites.</p> <p>A number of south Hampshire’s authorities look unable to meet their housing needs in full and WCC should assist in dealing with their unmet need under the Duty to Cooperate. The housing ‘shortfall’ has increased from 10,750 to around 13,000, largely as a result of Southampton’s 35% urban uplift requirement. Winchester should be a key contributor towards meeting this unmet need. The current buffer has to cover the potential shortfall but also changes to the</p> | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> Amend the Local Plan to refer to an ‘<b>unmet needs allowance</b>’ for the PfSH area rather than a ‘<b>buffer</b>’ and update the scale of the allowance to reflect housing needs/provision.</p>      |

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|                  | <p>standard method, and it is not suitable to address this shortfall. A 20% buffer is more appropriate as a minimum to contribute towards this unmet need which would result in c. 2,600 dwellings. Policy H1 also suggests there are 8,560 dwellings with extant planning permission across the district and that no buffer has been included for non-delivery. We suggest this is not a robust approach and that a non-delivery buffer of 10% should be included to the overall total, which is commonplace in plan making, and would increase the requirement by a further c. 856 dwellings. The Council is too reliant on strategic sites which account for over 5,000 dwellings. Not including a non-delivery buffer fails to take account of changing circumstances including nutrient neutrality, which will continue to impact housing delivery.</p> <p>An uplift in the housing requirement of at least an additional c. 2,006 dwellings over the plan period is needed to help meet unmet need and provide flexibility to deal with non-implementation of current consents.</p> |   |
| ANON-KSAR-N8QS-U | <p>The PfSH SoCG published in October 2021 set out an anticipated shortfall of 12,896 dwellings for the period 2021-2036 and the 2022 revision sets out a substantially higher estimate of 19,865 dwellings. The nominal uplift in the SM figure (1450) represents a very small proportion of this estimate. There are virtually no other authorities that are able to make a sizeable contribution to address this.</p> <p>Winchester may not be able to identify significant additional strategic sites, beyond current commitments adjoining the PfSH area, so the existing commitments at North Whiteley and West of Waterlooville should be explicitly hypothecated</p>  | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> Amend the Local Plan to refer to an ‘<b>unmet needs allowance</b>’ for the PfSH area rather than a ‘<b>buffer</b>’ and update the scale of the allowance to reflect housing needs/provision.</p> |

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|                  | <p>to meeting need arising within PfSH, rather than within the District. There is then a need for additional sites to be identified to meet the District's own need, which should be focused on the Winchester Urban Area, as the social and economic heart of the District and the most sustainable settlement.</p>   |   |
| ANON-KSAR-N81U-W | <p>Winchester in conjunction with nearby authorities have identified an unmet need for c.20,000 homes to 2036 across the area covered by the Partnership for South Hampshire. Southampton now identifies a higher unmet need and the unmet needs are now likely to be greater than previously envisaged. The authorities propose to identify a number of Strategic Development Opportunity Areas in a Joint Strategy which has not yet been published. It may become necessary to accommodate a substantial proportion of the unmet need which means that the some sites which would otherwise meet the needs of Winchester District may be diverted to meet unmet needs. The emerging Local Plan should respond to the emerging Joint Strategy once published.</p> <p>If the emerging Local Plan is progressed in the absence of the Joint Strategy, it will need to respond to the unmet need rather than deferring this issue, which would be unsound. The Plan proposes to contribute 1,450 homes towards the unmet needs of the sub-region. Whilst in principle this is welcomed, there is no evidence as to how this contribution has been arrived at, or whether it will be sufficient.</p> | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> Amend the Local Plan to refer to an '<b>unmet needs allowance</b>' for the PfSH area rather than a '<b>buffer</b>' and update the scale of the allowance to reflect housing needs/provision.</p> |
| ANON-KSAR-NKJ4-8 | <p>It is disappointing that work by PfSH on the scale of unmet need and its distribution has not yet been completed, but PfSH have published updates to the Statement of Common Ground (SoCG). These demonstrate unmet need is in the</p>  | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> Amend the Local Plan to refer to an '<b>unmet needs</b></p>  |



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|                  | <p>region of 20,000 dwellings to 2036, a significant increase from the 2021 SoCG. Southampton City Council's current consultation sets out that their overall need is 26,500 which increases the total unmet PfSH need to 22,700 homes.</p> <p>Further work should be provided to PfSH to confirm the total need and supply in the part of the district within PfSH to ensure an accurate representation of capacity. Winchester City Council is largely unconstrained, with large areas not covered by landscape designations, impacted by nutrient neutrality, or M27/A27 capacity issues. PfSH confirms that Strategic Development Opportunity Areas will accommodate some housing, but they will not accommodate all the unmet need. Substantial work is needed to ascertain how many homes each PfSH local authority is required to accommodate, but the figure of 1,450 would not make a meaningful contribution.</p> | <p><b>allowance</b> for the PfSH area rather than a 'buffer' and update the scale of the allowance to reflect housing needs/provision.</p>   |
| ANON-KSAR-NKAP-U | <p>The plan should take advantage of revised Government Planning Policy to resist pressures from areas outside Winchester and ensure that this area (particularly the area which should have been included as part of the SDNP) will be strengthened.</p>   | <p>Comments noted, see general response on this issue below.<br/><b>Recommended response:</b> No change.</p>   |
| ANON-KSAR-N8QS-U | <p>The buffer of 1,450 is a welcome recognition that the SM is a starting point, especially as the Plan area impinges on the PfSH area to the south.</p>  | <p>Comments noted and support welcomed.<br/><b>Recommended response:</b> No change.</p>  |
| ANON-KSAR-NKX6-R | <p>Whilst in support of the overall policy, object that such a large area of the South Downs National Park should receive only 500 dwellings, putting pressure on the remainder of the area to deliver its quota. WCC should either negotiate harder with the SDNP Planning Authority or at National</p>  | <p>Comments noted, see general response on this issue below.<br/><b>Recommended response:</b> Amend the Local Plan to refer to an estimated contribution of about 350 dwellings within the SDNP part of Winchester</p> |

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|                  | Planning Policy level to restructure this disproportionate allocation.  | District over the Local Plan period, and set out the remaining housing requirement for the Local Plan area (excluding the SDNP).   |
| BHLF-KSAR-N8ZW-8 | <p>The Local Plan sets out how development will be planned across the whole of Winchester District outside of the South Downs National Park but policy H1 states that 500 will be delivered in the SDNP. The Local Plan does not, therefore, provide 100% of the housing requirement for the District.</p> <p>The National Park is constrained with very limited opportunities to accommodate development in a sustainable or acceptable manner. The SDNP cannot accommodate its own housing requirements, let alone the housing requirements of adjacent Districts. There is no evidence that the National Park will be able to deliver 500 dwellings which would result in unsustainable patterns of development. Winchester District is capable of sustainably accommodating all of its housing requirement and the 500 dwellings should be reallocated within Winchester City Council's administrative area. Further, there is an opportunity for the unmet need from the National Park to be accommodated within Winchester and the surrounding settlements.</p> | <p>Comments noted, see general response on this issue below.</p> <p><b>Recommended response:</b> Amend the Local Plan to refer to an estimated contribution of about 350 dwellings within the SDNP part of Winchester District over the Local Plan period, and set out the remaining housing requirement for the Local Plan area (excluding the SDNP).</p> |

General Response on Duty to Cooperate / Meeting Unmet Needs / The 'Buffer'

The Council has published the Housing Topic Paper which deals with this matter in detail at Chapter 4. The following provides a summary.

The duty to cooperate (DTC) was introduced by section 33A of the Planning and Compulsory Purchase Act 2004 and the Localism Act 2012 and requires prescribed public bodies to work together on strategic cross boundary matters. The NPPF expects 'effective

*and on-going joint working between strategic policy-making authorities and relevant bodies .... to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere* (NPPF para 26). Plan-making authorities are advised to *'prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these'* (NPPF para 27).

The Planning Practice Guidance contains considerable guidance on statements of common ground and the DTC. This places the onus on authorities to explore all available options for addressing their own needs and to make every effort to secure cooperation on cross-boundary matters. It clarifies that *'authorities are not obliged to accept needs from other areas where it can be demonstrated it would have an adverse impact when assessed against policies in the National Planning Policy Framework'* (PPG ID: 61-022-20190315). The PPG clarifies that statements of common ground are a means of demonstrating effective cooperation and these will be taken into account by an Inspector at the Local Plan examination. The DTC applies to local plan reviews and updates, and *'the level of co-operation is expected to be proportionate to the task and should not unduly delay the plan review'* (PPG ID: 61-075-20190723).

Some respondents suggest that the (previous) Government was proposing to remove the Duty to Cooperate or make other changes that will mean that a lower requirement can be adopted, or that the Plan should be delayed until the situation is clarified. Conversely, comments by development interests raise various matters that they suggest justify a housing requirement that is higher than the SM figure, most commonly the requirement under the Duty to Cooperate to consider whether provision can be made to help meet the needs of those authorities that are unable to meet their housing need figures in full. Consideration is given firstly to whether an 'unmet needs' allowance is likely to be required / justified in principle.

### **Principle of an Unmet Needs Allowance**

The December 2022 Government consultation on planning reforms suggested that the Duty to Co-operate would be removed and replaced by an 'alignment policy' through the Levelling Up Bill which was progressing through Parliament at the time. This has now been enacted (Levelling-up and Regeneration Act 2023) and there are provisions for the replacement of the legislation that imposes the Duty to Cooperate. However, these provisions have not yet been enacted and the Act indicates that they will *'come into force on such day as the Secretary of State may by regulations appoint'*. Transitional arrangements mean that the Duty to Cooperate will remain for plans submitted for examination before June 2025 and adopted by December 2026, which is the intention for the Winchester Local Plan. The new Government elected in July 2024 has not yet indicated whether it will maintain these transitional arrangements.

In addition, the previous Government consultation indicated that details of the replacement 'alignment policy' would be included in a future NPPF. The December 2023 NPPF does not refer to the alignment policy and continues to include a section on 'maintaining effective cooperation', including reference to the Duty to Cooperate. Therefore, pausing the Plan until the DTC is removed (if the new Government elected in July 2024 maintains this aim) would involve a substantial delay and there would still be a need to satisfy a (currently unknown) 'alignment policy'. There will still be an expectation of some sort of 'alignment' with neighbouring areas and delaying the Plan to wait for the proposed changes would involve risks of substantial delay for uncertain (if any) benefits. Accordingly, the Local Plan will continue to need to demonstrate how it has taken into account unmet housing needs from other authorities in the same housing market area and any other strategic cross boundary issues. This is likely to remain a requirement under the DTC but, even if this is removed, it will be replaced by an 'alignment policy'. Therefore, delaying the Plan to await the removal of the DTC would seem to be of little benefit, but would lead to potentially significant risk and delay. It is recommended that the Plan should be progressed under current legislation, which requires the DTC to be satisfied as a matter of 'legal compliance'. The Local Plan's legal compliance would be examined in accordance with current legislation (at the time of the examination). Therefore, in principle, an allowance for unmet needs should continue to be added to the SM figure. The nature and scale of any unmet needs are considered below.

### **Expected Location and Scale of Unmet Housing Needs**

The previous Government had proposed to abolish the 'Duty to Cooperate' in the Levelling-up and Regeneration Bill and various respondents suggest that this means the Plan's 'buffer' for unmet needs should be removed. Others suggest that unmet needs are underestimated and the housing requirement should be increased further to help meet them. The Government consultation referred the introduction of an alignment policy to secure appropriate engagement between authorities, which would be tested at examination. It is, therefore, likely that the DTC will still apply when the Plan is examined or, if not, that the new 'alignment policy' will continue to expect 'appropriate engagement'.

The Levelling Up and Regeneration Act 2023 now includes provisions to remove the Duty to Co-operate but these provisions have not yet been enacted. Transitional arrangements mean that the Duty to Cooperate will remain for plans submitted for examination before June 2025 and adopted by December 2026. The new Government elected in July 2024 has not yet indicated whether it will maintain these transitional arrangements. The December 2023 NPPF update does not refer to the proposed alignment policy and makes no changes to the section on 'maintaining effective cooperation', including reference to the Duty to Cooperate. The Winchester Local Plan is due to be submitted for examination in early 2025 and adopted by the end of 2025. Therefore, the DTC will not be removed and a new 'alignment policy' put in place by the time the Local Plan is submitted. There would need to be a

substantial pause in processing the Plan if the Council wished to avoid the DTC and there would still be a need to satisfy a (currently unknown) 'alignment policy'.

The NPPF specifically requires that *'in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for'* (NPPF para 61) and the PPG suggests that the areas to be covered by statements of common ground will depend on the *'strategic matters being planned for'* and *'the most appropriate functional area to gather evidence... for example housing market and travel to work areas'* (PPG ID: 61-017-20190315). Advice is then given on how to define housing market areas, which are clearly the most relevant geographical area in terms of housing needs.

The [Winchester District Strategic Housing Market Assessment](#) (SHMA 2020) undertook a detailed assessment of the housing market areas within and adjoining the District (SHMA Appendix 1). This reflected the PPG advice and included consideration of the housing stock, house prices, affordability, commuting and travel to work areas, self-containment, and previous SHMA studies. The SHMA concludes that *'Winchester District shows a differentiation between north and south. The southern parts of the local authority have strong commuting connections with Havant, Portsmouth and Fareham, displaying similar house prices and types. On the other hand, Winchester town shows consistently higher house prices than the rest of the District...'* (SHMA Appendix 1 para 2.60 – 2.61) and this is illustrated at Figure 2.14 of the SHMA. A focussed SHMA update has been undertaken, but this does not suggest any change to the housing market areas.

There have been several SHMAs focussed on different scales or locations, but these typically confirm that this north – south differentiation extends into neighbouring authorities. The northern part of the District is commonly identified as being within a Central Hampshire market area that includes the northern parts of Winchester, Test Valley and East Hampshire Districts and Basingstoke (although the Basingstoke SHMA concludes Basingstoke is a self-contained HMA). In the south, most SHMAs identify a South Hampshire housing market area, often split into Southampton and Portsmouth sub-areas. This includes the southern parts of Winchester, Test Valley and East Hampshire Districts along with a series of South Hampshire local authority areas: Southampton, Eastleigh, Fareham, Gosport, Portsmouth, Havant (and in some reports New Forest and Chichester). This generally coincides with the Partnership for South Hampshire (PfSH) area and some HMAs identify PfSH as a housing market area.

Central Hampshire / Northern Winchester District HMAs: The 'neighbouring areas' to the north of the District are Test Valley, East Hampshire and potentially Basingstoke and Deane. Along with Winchester, these are all large rural districts that are typically capable of meeting their own housing needs in full. Basingstoke did not comment on the housing provisions of the draft Local Plan. Test Valley's comments supported references to collaborative working with neighbouring authorities and PfSH and confirmed its

draft Local Plan is seeking to meet its housing requirement in full. East Hampshire commented only on the unmet needs in PfSH. Therefore, none of the Central / Northern housing market area authorities have identified any unmet housing needs.

South Downs National Park: The part of the South Downs National Park (SDNP) within Winchester District is primarily in the SHMA's Northern Market Area, so within the wider Central / Northern HMA. About 40% of Winchester District lies within the SDNP but this sparsely developed area accommodates only about 10% of the District's population. The SDNP undertook its own Housing and Economic Development Needs Assessment in the preparation of its current Local Plan (South Downs HEDNA 2017). The National Park Authority and Winchester City Council signed a statement of common ground in March 2018 during the preparation of the South Downs Local Plan. This confirmed that the Objectively Assessed Need (OAN) within the National Park part of Winchester District was 31 dwellings per annum, of which the South Downs Local Plan could provide 15 dwellings per annum. The shortfall would be provided within the rest of Winchester District through the Winchester District Joint Core Strategy in place at the time (covering the whole District).

The SDNP Authority has published an updated Housing and Economic Development Needs Assessment (HEDNA, September 2023). If the Winchester Standard Method were applied in proportion to the population of the SDNP part of Winchester District ('top down' method) there would be a need for 69 dwellings per annum in the SDNP part. An alternative 'bottom up' approach using local evidence of housing need produces an annual need of 38 dwellings. The HEDNA concludes that *'the bottom up approach is based on local demographic evidence and market signals specific to the National Park, as per the PPG it is more robust and is a better illustration of need than the top down approach'* (SDNP HEDNA 2023, para 4.70).

The Standard Method gives a whole-District housing figure, but the emerging Winchester Local Plan will cover only that part of the District outside the National Park. The part within the National Park is covered by the existing South Downs Local Plan and its forthcoming review. Therefore, it is necessary to determine either a housing requirement for the non-SDNP part of the District, or how much of the District SM is likely to be provided within the SDNP. The 2023 SDNP HEDNA considers 'top down' and 'bottom up' methods of determining housing need, resulting in annual figures of 69 or 38 dwellings respectively. The level of need within the SDNP part of the District has not, therefore, yet been determined but, given the constraints of the Park area, it is not expected that the Park will be able to meet its housing needs in full whichever approach is adopted.

Nevertheless, some housing will be achieved within the SDNP part of the District. Having assessed the level of existing completions, commitments, Local Plan allocations and windfall potential, officers from Winchester and the SDNP Authority had previously agreed that the provision of about 500 dwellings over the Local Plan period within the SDNP part of the District would be a reasonable working assumption to make in the draft Winchester Local Plan. Almost half of this (222 dwellings) was already

identified through completions since the start of the Regulation 18 Local Plan period, planning consents and SDNP Local Plan / Twyford Neighbourhood Plan allocations. The remainder would be provided through windfall over the Winchester Local Plan period, averaging about 14 dwellings per annum across the 20-year Local Plan period.

Some comments on the draft Local Plan question why some of the District housing requirement is proposed to be provided in the National Park, and interpret this as Winchester not meeting its SM housing figure. This misunderstands the fact that the SM figure covers the whole of Winchester District, which includes a substantial area within the SDNP. It is not, therefore, a matter of Winchester failing to meet its SM figure, but of determining how much of this is likely to be provided within the SDNP part of the District (through the existing and replacement SDNP Local Plan), and how much remains to be provided in the rest of the District (through the emerging Winchester District Local Plan). Based on previous assessments of housing need in the SDNP part of Winchester District, it is expected that there will be some unmet needs from the SDNP which the Winchester Local Plan will need to provide. The precise level will be determined through work currently being undertaken for the SDNP Local Plan Review.

Other comments suggest the figure allocated to the SDNP should be higher, or that it would be harmful to the SDNP. The provision of 500 dwellings over the 20-year Plan period equates to 25 dwellings per annum, which is lower than either of the needs identified in the 2023 HEDNA and the previously-assessed OAN (31dpa), but higher than anticipated in the earlier Statement of Common Ground (15dpa). The SDNP does not have its own SM requirement as it is not a District Council and covers various local authority areas.

The figure of 500 dwellings within the SDNP part of the District over the Local Plan period was previously agreed by officers of the respective authorities as making a substantial contribution towards meeting the SDNP's housing need (which was 620 dwellings over 20 years using the previous HEDNA figures), taking account of the constraints applying and the expected capacity over the Plan period.

In response to the Regulation 18 Local Plan the SDNPA commented that *'the figure of 500 homes will need further evidence as part of the SDNP Local Plan Review which is just starting, and that it will continue to work proactively with WCC to achieve a robust joint position through a new Statement of Common Ground, whilst not pre-empting the South Downs Local Plan Review and taking into account forthcoming amendments to the NPPF'*. Both authorities are working on a Statement of Common Ground, but strong concerns have been expressed by SDNPA officers about the 500 dwelling figure and it was pointed out that the Levelling Up and Regeneration Act 2023 now requires authorities to *'further'* the purposes of National Parks. City Council officers have urged the SDNP to accommodate as much of its own housing need as possible, whilst recognising the constraints that exist and the priority given by legislation to conserving and enhancing National Parks.

While the SDNP Authority did not formally object to the inclusion of the 500 dwelling figure, it has significant concerns and the figure also needs to be updated. The situation regarding completions, commitments, and future Local Plan allocations is fluid, but there remains a need for the Winchester Local Plan to estimate the expected number of completions in the SDNP area over the Plan period. Past delivery rates in the SDNP part of the District amounted 21 dwellings per annum from 2011 to 2023, reducing to 16 dwellings per annum in the last 10 years (2013 to 2023). If similar rates were achieved over the emerging Local Plan period (2020-2040) this could deliver 320 – 420 dwellings. This does not take account of any new allocations that may be made in the emerging SDNP Local Plan. On this basis, a modest estimate of about 350 dwellings is made of completions within the SDNP part of the District over the Local Plan period. This could meet part of the SDNP's housing need of 760 dwellings over 20 years (based on the 2023 HEDNA 'bottom up' figures). Ultimately it is for the SDNP Local Plan to assess housing needs across the SDNP area and to put forward appropriate housing policies and allocations, but this process will not be completed before the Winchester Local Plan progresses to the Regulation 19 version.

The housing contribution from the SDNP part of the District is uncertain as the SDNP Authority is reluctant to commit to a figure in advance of further work to update its Local Plan. If the estimate of 350 proves to be too high, any shortfall can be provided from the 'unmet needs allowance', if it proves to be too low the amount available to meet other unmet needs will be higher. This area of uncertainty will be noted in the updated Statement of Common Ground and resolved as the SDNP Local Plan progresses.

The draft Winchester Local Plan referred to the total District housing requirement of about 15,620 dwellings in its relevant polices (H1, H2, H3). This included the 500 dwellings expected in the SDNP part of the District, which is outside the Winchester Local Plan area. There is a question, therefore, of whether the Winchester Plan should only refer to the housing requirement for the Local Plan area (excluding the SDNP) or the whole-District requirement. The Plan needs to explain how it has arrived at the District requirement, and how much is estimated in the SDNP part of the District, but it is recommended that the Winchester Local Plan policies (H1 – H3) should only refer to the requirement for its Plan area (excluding the SDNP element), not the full District requirement.

South Hampshire / PfSH / Southern Winchester District HMAs: The 'neighbouring areas' to the south of the District are the southern parts of Test Valley and East Hampshire, Southampton, Eastleigh, Fareham, Gosport, Portsmouth, Havant and potentially New Forest and Chichester. These are all part of the Partnership for South Hampshire PfSH, except for Chichester. As noted above, Test Valley and East Hampshire are large rural districts that are capable of meeting their own housing needs, with Eastleigh and Fareham also likely to exceed their housing needs. Other more urban districts may not meet their housing needs, especially Southampton, Portsmouth and Gosport. Havant had expected to exceed its SM figure but this is no longer the case having



withdrawn its Local Plan over soundness concerns. New Forest is a large rural district but much of it is either within the New Forest National Park or constrained by green belt or ecological designations, so expects to have a substantial shortfall over its SM figure. The City Council is in the process of producing Statements of Common Ground with relevant individual Local Planning Authorities and statutory agencies prior to publication of the Regulation 19 Local Plan.

The draft Local Plan proposed a 'buffer' of 1,450 dwellings either to accommodate future increases in the Standard Method figure or to help meet the unmet needs of other authorities (draft Local Plan Table H2, page 229). Comments were received on the draft Local Plan from Test Valley, East Hampshire, Southampton, Eastleigh, Fareham, Portsmouth and Havant, summarised above.

It will be noted from the comments received that the only formal request to help with unmet needs at the Regulation 18 Local Plan stage was from Portsmouth, although Havant has since made a request. All the Hampshire authorities within the South Hampshire HMA have worked together as part of the Partnership for South Hampshire (PfSH) to develop an updated Spatial Position Statement (agreed by the PfSH Joint Committee in Dec 2023), as mentioned in several comments. This work had already led to draft PfSH Statements of Common Ground agreed by all authorities through the PfSH Joint Committee. These set out the formal agreement to work together on cross-boundary strategic issues and the joint working on evidence studies and strategy development that has now culminated in the Spatial Position Statement.

PfSH has been a forum for South Hampshire authorities to work together for many years, having been set up in 2003, and has a strong track record in collaborative working. It was heavily involved in the production of a sub-regional strategy for the South East Plan which was tested through public examination and adopted by the Secretary of State. The Partnership has provided effective strategies for sub-regional planning and works with partner agencies as well as Government departments to deliver joint strategies and pool resources. A Statement of Common Ground was agreed by the Joint Committee in 2020 and this has been updated annually since (in 2021 and 2022). These SoCGs include tables setting out current housing need (using the SM) and supply across the PfSH area. Various development interests highlight that the 2022 update tables indicate a 'shortfall' across PfSH of almost 20,000 dwellings, an increase from almost 13,000 the previous year. They suggest that the situation may worsen when the SM is updated and that Winchester should include a bigger 'buffer', which should be dedicated to helping with unmet needs in PfSH.

The 2023 update to the [PfSH Statement of Common Ground](#) includes Table 1 which sets out an updated housing need, supply and any shortfall, amounting to about 14,500 dwellings. However, these do not equate to unmet housing need over the period concerned, rather a 'snapshot' of the current situation. The housing needs are based on the 2022 SM so will change over time. Also, the housing supply situation is based only on planning consents, allocations in adopted local plans, and SHELAA / windfall

sites where justified. As the SoCGs 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.

Furthermore, Winchester City Council is only partly within the PfSH area and has not defined any spatial area / housing target in its Local Plans that correlates to the PfSH part of the District. The SoCG has therefore needed to make an estimate of housing need within the PfSH part of Winchester, which is based on the proportion of the District's population estimated to be in PfSH. However, this does not reflect the SM or the planning strategy for the District, which focusses substantial development in the south, reflecting the provisions of the previous South East Plan and the current Local Plan. For this reason the housing supply in the PfSH part of the District appears significantly higher than the theoretical 'need', implying a surplus of supply that is available to meet wider PfSH needs. Over the District as a whole (which is the area dealt with by the SM) there is not a significant surplus and the City Council does not, therefore, accept that the supply 'surplus' that was shown in previous versions of the SoCG represents a realistic position or is actually available to PfSH. Accordingly, the 'supply' at Table 1 of the 2023 SoCG has been set to balance the 'need' (see footnote 4 of the SoCG) so as to show a zero surplus/shortfall for Winchester and remove any misleading impression of a surplus of housing within the PfSH part of the District.

Some respondents to the draft Local Plan suggest that this means Winchester is refusing to make available this theoretical surplus to PfSH or that it is using housing in the PfSH part of the District to meet the housing needs of other parts. These arguments are not accepted as the SM (and OAN previously) is a District-wide figure and it is for the Local Plan to determine the development strategy for apportioning it within the District. It is not necessarily possible or appropriate to base this apportionment simply on the proportion of population in each sub-area, as has been shown above in the case of the SDNP.

Various respondents express concern that the PfSH Joint Strategy may not be available in time to inform the Local Plan, although some accept that the Plan should be progressed anyway with an allowance along the lines of the draft Plan's 'buffer'. In fact, the PfSH [Spatial Position Statement](#) was agreed and published by the PfSH Joint Committee in December 2023. This sets out strategic principles for future development and identifies which PfSH authorities are likely to have unmet needs and which may be in a position to help provide them, broadly reflecting the situation described at paragraph 4.23 above. The [Spatial Position Statement](#) updates the 'snapshot' of housing needs and supply using the 2023 SM, resulting in an overall shortfall of 11,771 dwellings (PfSH Spatial Position Statement Table 1). The Spatial Position Statement proposes a two-stage approach to meeting housing needs, firstly identifying those authorities (including Winchester) which are likely to be able to meet or exceed their housing needs in the short / medium term, and secondly identifying broad locations for strategic growth in the longer term. These new

'broad areas of search' (Strategic Principle SPS8) include one area within Winchester District (East of Botley) and are estimated to have a total capacity of about 9,700 dwellings.

The PfSH Spatial Position Statement therefore sets out a strategic approach to meeting the housing needs of the sub-region. The Regulation 18 Local Plan included a 'buffer' to contribute towards PfSH unmet needs and it is recommended above that this be updated in the Regulation 19 Plan and termed an 'unmet needs allowance'. This is consistent with the first stage of PfSH's approach to meeting housing needs and will result in a significant short / medium-term contribution.

While the PfSH Spatial Position Statement identifies a 'broad area of search' East of Botley, policy SPS8 is clear that the suitability and deliverability of such areas should be considered in local plans, in accordance with stage two of the PfSH strategy. In order for a Local Plan to identify and allocate any new strategic growth areas substantial additional work would be needed to refine the area of search, assess constraints and other evidence, consult landowners and the public, and develop detailed site allocation proposals and masterplans. Under current Government guidance this would also need to include consideration of 'reasonable alternatives'. If this work were undertaken as part of the current emerging Local Plan it would be necessary to delay the Plan for a considerable period.

It is recommended above that the emerging Local Plan should not be delayed to await removal of the Duty to Cooperate. Nor should a substantial delay be introduced to facilitate the planning of a new strategic growth area. Any work on a potential new strategic growth area, if still needed at the time, should be progressed by means of a Local Plan review, or possibly a separate plan for the area concerned.

The current position with regard to unmet housing needs within PfSH, therefore, is that only one authority commenting on the draft Local Plan has attempted to quantify their unmet needs (Portsmouth) and another has since done so (Havant). Portsmouth City Council has since made a formal request to Winchester City Council for help in meeting its unmet housing needs, but neither its Plan nor Havant's have yet been independently examined to show that all options to meet needs have been rigorously assessed ('no stone unturned'). Portsmouth's letter requests help with an unmet housing need of 3,577 homes, after taking account of provision within the Fareham Local Plan (800 dwellings). Havant expects to have a shortfall of about 4,300 dwellings, which it has now formally requested assistance with. These figures pre-date the updated Standard Method figures for these authorities, which have reduced by a small amount.

In order to be able to progress its Local Plan in the face of these uncertainties, Winchester included the 'buffer' of 1,450 dwellings in the Regulation 18 Local Plan. The draft Local Plan referred to this as also potentially being needed to deal with an increase in the SM, but this has not materialised in 2023 or 2024, so appears unlikely to increase before the Plan is submitted for examination. It is, therefore, recommended that an updated 'unmet needs allowance' should be included in the Regulation 19 Plan, specifically to contribute towards unmet needs in the PfSH area rather than a more generalised 'buffer'. The scale of the allowance is considered below.

A similar approach was adopted by Fareham Borough Council in its Local Plan, now recently adopted. It identified a 900 dwelling allowance for PfSH, of which 800 was specifically to help meet unmet needs in Portsmouth. This approach was assessed by the Inspector examining the Plan, whose report comments as follows on the DTC:

*'19. One of the key strategic cross boundary and sub regional issues has been the issue of unmet housing need. This has been the subject of discussion through the PfSH. The Partnership are working on a revised Spatial Position Statement to set out the overall need for and distribution of development in South Hampshire. This is anticipated to be available in late 2023.*

*20. Portsmouth City Council made a request to the Council in February 2020 for Fareham to contribute 1000 dwellings towards its unmet housing needs. This figure was later reduced to 669 dwellings in September 2020 after the authority had undertaken further work. In advance of the Partnership's sub regional work, the Council has committed to contribute 900 dwellings towards the sub regional unmet housing need. This figure is included in the submitted Plan.*

*21. In summary, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the DtC has therefore been met.'*  
([Fareham Local Plan 2037 Inspector's Report](#), paragraphs 19 – 21)

The Fareham Inspector's Report considers the issue in greater detail at paragraphs 66 – 69, where the 'shortfall' set out in the PfSH SoCGs is noted, along with the request from Portsmouth to help with its unmet needs. The Inspector notes that *'many have argued that in light of the likely significant unmet need in the sub region, the Fareham Local Plan should make a greater contribution at this stage'* but she comments that *'the situation is still fluid, as the local planning authorities continue to work to progress their individual local plans. The implications of wider planning reform will also need to be considered. PfSH are working on a Joint Strategy to address this issue. This is expected to identify a housing distribution through the identification of Strategic Development Opportunity Areas. These would be for the individual authorities concerned to take forward in their local plans...* The Inspector concludes that *'it is not unreasonable for the authority to contribute towards Portsmouth unmet need in this Plan and to continue to work with the*

*PfSH on a Strategy to address the sub regional unmet need. Should this result in the need for further housing in the Borough, the Council has confirmed that they will consider an early review of the Plan....'*

([Fareham Local Plan 2037 Inspector's Report](#), paragraphs 68 – 69)

The Fareham Inspector's Report is recent (March 2023) and there are clear parallels between the Fareham and Winchester situations. Both authorities are part of PfSH and are faced with development interests suggesting a greater contribution towards unmet PfSH needs. The situation regarding the SM and planning reforms remains *'fluid'* to some extent, although PfSH has now agreed its Spatial Position Statement and strategy for housing provision. The Fareham Local Plan specifically referred to helping meet the unmet needs of Portsmouth, but that was the only authority that had requested such assistance at the time. Portsmouth and Havant have asked that Winchester make a contribution to their unmet needs, although these have yet to be confirmed through examination of either authorities' local plans.

Fareham volunteered to consider an early review of its Local Plan if the PfSH work resulted in a need for further housing. This is not something Winchester has suggested at this stage although, as noted above, a Local Plan review or a separate plan may be needed. Given that there also remains some uncertainty over future housing needs, and as a review of the Plan will be required in 5 years anyway, it is recommended that the Regulation 19 Local Plan should not include a commitment to an early review at this stage.

### **Scale of the Unmet Need Allowance / 'Buffer'**

As shown above, the scale of any PfSH unmet remains uncertain and is unlikely to be fully clarified before the Regulation 19 Local Plan needs to be finalised. The draft Local Plan proposed a 'buffer' of 1,450 dwellings and it is recommended that the Regulation 19 Plan should take a similar approach, but attributing this towards unmet PfSH needs. This would be consistent with the first stage of the PfSH strategy for meeting housing needs, with the second stage (new strategic growth areas) following through a new plan if necessary.

Various comments on the draft Local Plan question how the 1,450 dwelling buffer was derived and/or suggest that the Local Plan's spatial strategy should be changed to enable a significant increase in housing. The suggested means of addressing this issue often reflects where the respondent is promoting (or opposing) development. Those promoting sites around Winchester or in the north of the District tend to suggest that sites in the south should be hypothecated to meeting PfSH needs and their sites should be allocated to meet remaining District needs. Those promoting sites in the south of the District tend to suggest that their sites need to be allocated to help contribute towards meeting the PfSH need.

The Council has undertaken substantial consultation on the development strategy for the District. In part, this is dictated by the high level of housing completions and commitments remaining, which means that the existing Local Plan development strategy will continue to some extent. The Strategic Issues and Priorities consultation in 2021 identified 4 potential development strategies, which it fleshed out and asked for views on. The consultation showed a very clear preference for Approach 1 (distributing development to a sustainable hierarchy of settlements based on the existing Local Plan), which performed well in terms of its potential to support existing settlements, use of brownfield sites and reducing the need to travel. Approaches 2 and 4 were also fairly well-supported (focus development on Winchester or a more dispersed strategy). Approach 3 (new strategic allocation / settlement) received substantial objection and its promotion of large-scale greenfield development was considered at odds with maintaining the viability of existing centres, reducing travel and carbon emissions, and making best use of brownfield land (see Draft Local Plan paragraphs 9.9 – 9.11).

The proposed development strategy therefore is based on Approach 1, reflecting the legacy of the current Local Plan commitments, with elements of Approach 2 (particularly the allocation of Sir John Moore Barracks in Winchester) and Approach 4 (with the inclusion of housing targets for additional rural settlements). The Council has consulted on the reasonable alternatives and tested these through the Integrated Impact Assessment (IIA), including sustainability appraisal. The proposed development strategy is supported by the evidence base, including the fact that the level of PfSH unmet need remains to be defined precisely. It therefore reflects the (current) NPPF tests of soundness which require *'an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence'* (NPPF para 35b).

The 1,450 dwelling 'buffer' was derived from the development capacity that could be achieved through the proposed development strategy, taking account of the approach and quantum of housing offered to meet unmet needs in the adopted Fareham Local Plan. The Local Plan's housing requirement, land supply, development strategy and site allocations have been reviewed in the light of representations received and updated evidence. However, it is not accepted or considered reasonable that the Local Plan's development strategy should be changed to achieve a higher housing supply solely on the basis of the (currently not fully defined) unmet needs of the PfSH area. Indeed, some respondents suggest that the 'buffer' figure already requires too high a proportion of the new development allocations in the Local Plan.

The NPPF requires *'an appropriate strategy'* and no longer expects the Council to demonstrate *'the most appropriate strategy'*, although the Council believes the proposed strategy is the most appropriate, as do many consultees. Authorities that are unable to meet their housing needs in full are required to *'explore all available options for addressing their own needs'* ('leave no stone unturned') whereas Winchester is able to meet its needs and as such is *'not obliged to accept needs from other areas where it can*

*be demonstrated it would have an adverse impact when assessed against policies in the National Planning Policy Framework' (PPG ID: 61-022-20190315).*

Winchester is able to accommodate some unmet needs from neighbouring areas and is willing to do this, so far as possible, within the Local Plan's proposed development strategy. The PfSH Spatial Position Statement has now been agreed and the Local Plan's approach is consistent with this. The available capacity within the development strategy has been updated and it is recommended that the Regulation 19 Plan includes an 'unmet needs allowance' of about 1,900 dwellings, which is considered to be proportionate and achievable. If there is a need to identify and plan for a new strategic growth area, this should be through a review of the Local Plan or a separate development plan document, rather than introducing a substantial delay to the current emerging Local Plan.

### **Planning for Unmet Needs**

The draft Plan identified a 'buffer' of 1,450 dwellings to help contribute towards the unmet needs of other authorities and this was added to the overall SM figure to give an uplifted District requirement. Various representations suggest that reference to a 'buffer' is confusing given the reference in the NPPF to buffers for 5-year land supply. It is recommended above that this figure is updated in the Regulation 19 Local Plan and allocated specifically to contribute towards unmet needs. This would involve deleting reference to a 'buffer' and replacing it with the term 'unmet needs allowance'. However, some respondents suggest that the Plan should identify specific sites or locations as contributing towards unmet needs, and/or identify which authority's needs an area is contributing towards.

The NPPF and PPG require that the unmet need uplift should be added to the overall housing requirement (NPPF para 61, PPG Reference ID: 2a-010-20201216) and there is no requirement to allocate specific sites towards meeting this need. Nor is it necessary to identify which sites are meeting which authority's needs. Therefore the draft Local Plan followed this approach and identifies an overall 'buffer' as its contribution.

As identified above, any unmet housing needs are expected to arise in the South Hampshire housing market area, covered by the Partnership for South Hampshire (PfSH). In practice, there is already a significant emphasis on housing provision in this area, with two strategic allocations in the South Hampshire Urban Areas spatial area (West of Waterlooville and North Whiteley). This spatial area had provision for 5,700 dwellings in policy H3 of the draft Local Plan, or 36% of the total housing requirement at the time. In addition, other parts of the District's 'southern parishes' fall within the PfSH area, so provision at Bishops Waltham, Colden Common, Denmead, Wickham, Swanmore and Waltham Chase is all within the South Hampshire HMA. This totalled a further approximately 2,174 dwellings (including commitments and windfall), or 14% of the total provision. Hence, a total of about 50% of

the Regulation 18 Local Plan's housing requirement was within the PfSH area and this excludes any windfall potential in the smaller rural settlements.

With regard to the 'cities uplift', which applies to Southampton, the PPG is clear that *'this increase in the number of homes to be delivered in urban areas is expected to be met by the cities and urban centres themselves, rather than the surrounding areas, unless it would conflict with national policy and legal obligations....'* (PPG Reference ID: 2a-035-20201216). This message is reinforced in the updated NPPF: *'The standard method incorporates an uplift which applies to certain cities and urban centres, as set out in national planning guidance. This uplift should be accommodated within those cities and urban centres themselves except where there are voluntary cross boundary redistribution agreements in place, or where it would conflict with the policies in this Framework.'* (NPPF, paragraph 62). There is a voluntary cross-boundary strategy in place, in the form of the PfSH Spatial Position Statement, but this specifically rejects the option of accommodating the Southampton urban uplift within other PfSH authorities.

It is concluded that it is not necessary to apportion specific sites or locations to meeting unmet needs. This would involve making assumptions about which sites would meet which authorities' needs and could give the impression that occupancy of the housing provided is somehow restricted to residents from outside the District, which will not be the case. Equally, it is not necessary or desirable to identify which authority's unmet need certain sites are meeting. In fact, with the current level of uncertainty about the scale and location of unmet needs this would not be feasible anyway. Nevertheless, the Local Plan's development strategy already provides for substantial development in the south of the District, such that any uplift would be well located to help meet unmet needs within the PfSH area. Therefore, provision for unmet needs should continue to be added to the whole-District SM housing figure to arrive at a housing requirement, with sites allocated as necessary in accordance with the Plan's spatial development strategy.

While the SM is the starting point, and account needs to be taken of unmet needs in surrounding authorities, there may be other factors which need to be considered that could result in increases or decreases in the SM figure. Various factors are mentioned in the comments and these are considered in the following sections.

**Recommended response:** Amend the Local Plan to refer to an 'unmet needs allowance' for the PfSH area rather than a 'buffer', reference the PfSH Spatial Position Statement, update the scale of the allowance to reflect the updated housing requirement and supply, and refer to an estimated contribution of about 350 dwellings within the SDNP part of Winchester District over the Local Plan period, as follows:

Amendments to supporting text



9.14 The Government has made it very clear that it wants to boost the supply and delivery of new homes and it expects the 'Standard Method' to be used as the starting point to set the housing requirement for the district. In addition, the 'Duty to Cooperate' requires that account is taken of any needs that cannot be met by neighbouring areas in establishing the housing requirement. These requirements should be the basis for the Local Plan unless **this threatens the protection of areas or assets of particular importance, or the adverse impacts would outweigh the benefits (see NPPF paragraph 11b)**. ~~there is clear evidence of a lack of suitable and available sites.~~ The Standard Method calculation changes annually, with the position at March ~~2024~~**2023** being as follows:

Table H1 – Standard Method Annual Need

| Years of Plan Period                     | Standard Method Need | x Number of Years  |
|--|----------------------|--|
| 2019-2020                                | 666                  | 666 x 1 = 666  |
| 2020-2021                                | <b>685692</b>        | <b>685692 x 1 = 685692</b>                               |
| 2021-2022                                | <b>666665</b>        | <b>666665 x 1 = 666665</b>                               |
| <b>2022-2023</b>                         | <b>707</b>           | <b>707 x 1 = 707</b>                                     |
| <b>2023-2024</b>                         | <b>691</b>           | <b>691 x 1 = 691</b>                                     |
| <b>2024-2040</b><br><del>2022-2039</del> | <b>676715</b>        | <b>676 x 16 = 10,816</b><br><del>715 x 17 = 12,155</del> |
| <b>Total</b>                             |                      | <b>13,56514,178</b>                                      |

9.15 The Standard Method need is therefore currently **13,56514,178** dwellings for the District over the Local Plan period to ~~2039~~**2040** (see Table H1 above). Within southern Hampshire there are a number of authorities that appear unable to meet their Standard Method housing need in full ~~that may ask the City Council to assist under the Duty to Cooperate~~ **and the Partnership for South Hampshire (PfSH) is working to establish the scale of any shortfall in provision and to has developed a**

Joint Strategy **Spatial Position Statement** to address this. ~~but this has not been completed in time to inform this draft Local Plan.~~

**9.16** The PfSH authorities are taking a two-stage approach to addressing the needs of those authorities that may demonstrate that they are unable to meet their housing needs in full. In the short to medium term several authorities, including Winchester, should be able to exceed their Standard Method-based housing needs. Therefore an unmet needs allowance ‘buffer’ of about ~~1,925~~1,450 dwellings is provided to cater for potential future increases in the Standard Method and, in the spirit of cooperation required by government policy, to help contribute towards the PfSH shortfall.

**9.17** In the longer term, the Spatial Position Statement identifies several ‘Broad Areas of Search for Growth’, where future local plans will assess the contribution they can make to ongoing unmet housing need in the sub-region. These seek to focus development on locations with a relative lack of significant constraints and which are most accessible by public transport, walking and cycling, or have the potential to be made accessible. Seven areas of search are identified, including ‘East of Botley’ within the Winchester Local Plan area. These areas are not allocated for development by either the PfSH Spatial Position Statement or this Local Plan. Significant further work will be required to develop detailed site allocation proposals and masterplans. This work will take several years to complete and will be progressed through either a review of this Local Plan or a dedicated Development Plan Document.

~~9.189.16~~ When assessing how much of the housing growth the council has to plan for needs to be provided on new site allocations in this Plan, the amount of housing already in the pipeline is taken into consideration. There are a large number of sites which already have consent for residential development, some of which have been completed since the start of the Local Plan period (~~2019~~**2020**), or which are allocated by the existing Local Plan but have not yet been developed....

Table H2 – Winchester District Housing Need and Provision

| Winchester District Housing Need   |                         | Winchester District Housing Provision                                      |                       |
|--|-------------------------|--|-----------------------|
| Standard Method need for Plan period <b>2020-2040</b> 2019-2039 (see Table H1715 x 20 years) | <b>13,565</b><br>14,178 | Completions since start of Local Plan period ( <b>2020-2023</b> 2019-2021) | <b>3,170</b><br>1,517 |

|  |                         |   |                         |
|--|-------------------------|---|-------------------------|
| <del>Unmet Needs Allowance</del> 'Buffer' (for Standard Method changes / unmet need in neighbouring authorities) | <b>1,900</b><br>1,450   | Outstanding planning permissions                    | <b>6,780</b><br>8,560   |
|  |                         | Other Commitments (previous Local Plans incl. SDNP) | <b>745</b><br>892       |
|  |                         | Windfall development                                | <b>1,895</b><br>1,975   |
|  |                         | Additional allocations made in this Local Plan      | <b>2,875</b><br>2,685   |
| Total <b>District</b> Housing Requirement  | <b>15,465</b><br>15,628 | Total <b>District</b> Housing Provision*            | <b>15,465</b><br>15,629 |

\* Includes **approximately 350**~~500~~ dwellings within the South Downs National Park part of Winchester District.

~~9.209-18~~ Table H2 shows that sufficient housing provision is proposed to meet the Winchester District housing requirement, which includes **an estimated 350**~~500~~ dwellings within the South Downs National Park part of the district and **an unmet needs allowance** 'buffer' of **1,900**~~1,450~~ dwellings in case of changes to the Standard Method or as a contribution towards the unmet needs of neighbouring areas in South Hampshire. **The remaining requirement for the Local Plan area (excluding the estimated 350 in the South Downs National Park part of the District) is 15,115 dwellings.** Some 64% of the **District** requirement is met by dwellings that have either been completed or which already have planning consent. A further 12% are expected from windfall development over the Plan period and this is based on cautious assumptions derived from the Assessment of Windfall Trends and Potential 2021. Therefore, less than 25% of provision is from Local Plan allocations (either carried forward or new), giving a high level of certainty over the delivery of this additional housing.

~~9.229-20~~ Policy SP2 sets out the development strategy for the **Local Plan area**~~district~~ and Policy H1 sets out how this will be achieved in terms of housing provision. The total provision of about **15,115**~~15,620~~ dwellings relates to **the Local Plan area and it is estimated that a further** ~~Winchester District. The Council has agreed with the South Downs National Park Authority that about 350~~~~500~~ dwellings will be provided within the National Park part of the district, which will come forward through the existing South Downs Local Plan (which covers the period to 2033) or a subsequent review.

Amendments to Strategic Policy H1

Housing will be permitted to provide for the scale, types and tenures of housing needed in ~~the district over~~ the Local Plan **area over the Plan** period (2019-2039-~~2020-2040~~), including a contribution towards the unmet needs of adjoining areas. Provision is made for the development of about ~~15,115,620~~ **15,115,620** dwellings (net) in this period ~~within the District~~ **(excluding the South Downs National Park area)**, by prioritising suitable previously-developed land within defined settlement boundaries, completion of strategic allocations at Kings Barton (North Winchester), ~~Berewood~~ **Newlands** (West of Waterlooville, ~~including Newlands~~) and North Whiteley, and delivery of sites allocated within and adjoining the most sustainable settlements, in accordance with the Local Plan's spatial strategy (set out in Policy SP2). Housing development will be distributed between the three spatial areas as follows:

- i. Winchester Town ~~about 5,640,670~~ **about 5,640,670** dwellings
- ii. South Hampshire Urban Areas ~~about 5,650,700~~ **about 5,650,700** dwellings
- iii. Market Towns and Rural Area ~~about 3,825,250~~ **about 3,825,250** dwellings ~~(of which 500 to be delivered in the South Downs National Park Local Plan area).~~

**Other Factors Which Could Affect the Standard Method Figure (Affordability, Flexibility, Economic Needs, etc)**

|   |   |  |
|---|---|--|
| <p>ANON-KSAR-N85K-Q<br/>HLF-KSAR-N8RJ-K<br/>BHLF-KSAR-N8ZD-N</p> <p><b>(3 comments)</b></p> | <p>The house price affordability ratio for Winchester District is 14.14, having risen from 7.91 in 2001, for England it was 9.05. There is a strong justification for an uplift to promote affordability to enable the need for affordable housing to be fully addressed.</p>   | <p>Comments noted, see general response on this issue below.<br/><b>Recommended response:</b> No change.</p> |
| <p>ANON-KSAR-N8M7-U</p>   | <p>The Council need to consider whether the number of homes being planned will meet identified need for affordable housing. The Council Strategic Housing Market Assessment (2020) indicates that there is a need for 343 affordable homes per annum – roughly 42% of the housing requirement. The Council's affordable housing policy requires 40% of homes on greenfield land to be affordable and 30% on brownfield sites, so the Council should consider allocating more sites to ensure these needs are met.</p> | <p>Comments noted, see general response on this issue below.<br/><b>Recommended response:</b> No change.</p> |
| <p>ANON-KSAR-NKJV-A</p>   | <p>The standard method is designed to take into account affordability issues. Winchester is the least affordable city in</p>  | <p>Comments noted, see general response on this issue below.</p>   |

|  |   |   |
|--|---|---|
|  | <p>the UK and the median affordability ratio has worsened in Winchester over the last 10 years and may worsen further, increasing the housing required to be provided using the standard method. Since the start of the plan period there has been an increase in the standard method and additional homes are likely to be required as affordability worsens. The buffer may be used up by decreasing affordability and a higher buffer should be included to accommodate unmet need elsewhere.</p> <p>The Winchester Strategic Housing Market Assessment (SHMA) identifies a need for 220 affordable rented dwellings and around 123 affordable ownership dwellings per annum in the period 2019-2036. The SHMA requirement of 343 affordable dwellings per annum represents 43.9% of the annual housing to be delivered based on the draft local plan provision, and Policy H6 identifies less will be sought on brownfield sites. Affordable housing may be further reduced by the requirement to address nutrient neutrality. Even higher percentages of affordable housing would be required in the later stages of the plan period, due to phasing in policy H2.</p> <p>The emphasis on brownfield sites in the early part of the plan period means that lower levels of affordable housing will be delivered arising from the need to mitigate the impacts of phosphates. There is a disconnect between relying on brownfield sites which are not going to deliver the quantum of affordable housing that greenfield sites will and there should be a better balance between greenfield and brownfield.</p> | <p>Comments regarding the Standard Method are addressed in the relevant topic section above.</p> <p><b>Recommended response:</b> No change.</p> |
|--|---|---|

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|------------------|---|---|
| ANON-KSAR-NKJ4-8 | <p>There are historic failings at WCC to deliver sufficient affordable homes, with this trend worsening. The median house price affordability ratio was 14.14, but for England stands at 9.05. There is then a strong case for an uplift well over the minimum Standard Method figure and additional market dwellings will also be needed to enable affordable housing needs to be fully addressed.</p> <p>With the Council’s priority on brownfield sites, only 30% affordable housing will be provided per site, limiting affordable housing provision. A greater allocation of greenfield sites would ensure 40% of sites come are affordable housing and would also provide a greater buffer.</p> | <p>Comments noted, see general response on this issue below. Comments regarding the Standard Method are addressed in the relevant topic section above.<br/> <b>Recommended response:</b> No change.</p> |
| ANON-KSAR-N81F-E | <p>Affordability is acknowledged to be a “major issue” and a “critical priority” for the plan, which is entirely justified. The affordability ratio in the district is higher than both the regional and national averages. Evidence also shows that there are over 3,000 households in unsuitable accommodation and over 300 new households each year are unable to afford to rent (SHMA).</p>   | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> No change.</p>   |
| ANON-KSAR-N8QS-U | <p>Affordability in Winchester is a compelling reason why the Council needs to boost housing supply, particularly in the City of Winchester. The affordability ratio has been increasing since 2014, to the point where it stands at 14.14. Winchester is among the least affordable 40 local authority districts in England. Economically and socially this is unsustainable and creates a situation where staff are having to commute great distances, the vast majority by car. The plan should take vigorous and focused action to address the issue, by substantially boosting housing supply, especially affordable tenures but it is far from clear that the Plan is seeking to do this.</p>   | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> No change.</p>   |

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|------------------|--|---|
| ANON-KSAR-N81U-W | <p>The SHMA identifies a need for 343 affordable homes per annum and the draft Local Plan proposes a housing requirement of about 15,620 homes (781 per annum). 2,747 homes will be provided on small sites which will not provide any affordable housing, leaving a residual requirement for 12,873 homes (644 per annum) which will be required to provide affordable housing. The Plan proposes that 1,450 of the 15,620 homes will address the unmet needs, meaning that only 91% of the housing delivered (11,678) will meet the needs of Winchester (584 per annum).</p> <p>To meet the need for 343 affordable homes per annum, it would be necessary to deliver on average 59% affordable housing (=589/343). Policy proposes 25% of housing on previously developed sites and 35% of housing on greenfield sites should be provided as affordable housing where development is required to mitigate the impact of phosphates, and 40% or 30% if phosphate solutions are in place. Far less than 59% of housing will be affordable and so the need for affordable housing will not be met as required by the NPPF.</p> <p>Even if it is assumed that every development of 10 or more homes delivers 40% affordable housing, the need for affordable housing can only be met in full if 858 homes are delivered annually, equating to 17,150 homes over the plan period. Combined with the contribution of 2,747 homes from small sites, this would require the delivery of c.20,000 homes over the plan period excluding any contribution to unmet sub-regional needs.</p> | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> No change.</p> |
| BHLF-KSAR-N8TN-S | <p>Welcome the Local Plan strategy but object on the basis that it is not delivering sufficient housing, including affordable housing or housing for older people, and is not</p>  | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> No change.</p> |

|                  |   |   |
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|                  | <p>therefore in accordance with National Planning Policy.</p> <p>The Plan is overly reliant on larger existing housing allocations and disregards settlements like Headbourne Worthy, which can accommodate incremental growth to sustain the community and meet the needs of local people. In particular, young people and families have such limited choice of housing if they wish to remain a part of their local community. The emerging new Local Plan should make suitable allocations in sustainable small and modest settlements to sustain communities and meet the varied needs of local people.</p> |   |
| ANON-KSAR-NKYT-Q | <p>There is an immediate need for social housing to be provided in locations which are appropriate to the demand and this is the only type of housing that should be prioritised throughout the area. Such dwellings should in urban and suburban areas not be planned to take account of private car use. Unfortunately 'affordable' housing is not a viable definition as the prices are way beyond the means of those on an 'average' wage. However, special 'first time buyer' options should be given priority to replace the previous 25% allocation for 'affordable housing'.</p>                        | <p>Comments noted, see general response on this issue below. Comments regarding types of affordable housing are addressed in relation to representations on Policy H6.</p> <p><b>Recommended response:</b> No change.</p> |

General Response on Other Factors Which Could Affect the Standard Method Figure

The SM is the advisory starting point for determining the housing requirement, but it may need to be increased for various reasons. The implications of the Duty to Cooperate in relation to providing for unmet needs have been considered above. Comments by development interests have raised various other matters that they claim justify a housing requirement which is higher than the SM figure. These factors are considered in turn below.

**Housing Affordability**



Representations from various development interests highlight Winchester's high 'affordability ratio' and the scale of need for affordable housing. Some suggest that the [Strategic Housing Market Assessment](#), which assesses affordable housing need, should be updated and that it shows a level of affordable housing need that exceeds what can be met by provision as a proportion of market housing sites. They suggest there is a strong case for increasing the overall housing requirement and supply, especially by allocating additional development sites, so that the scale of affordable housing need can be met from the proportions of affordable housing required in policy H6.

The NPPF advises the use of the Standard Method (paragraph 61) and that *'within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing...)'* (NPPF para 62). The reference to *'within this context'* is taken to mean that provision for affordable housing should be made within the SM housing figure, not in addition to it. This is reinforced by NPPF footnote 27 which suggests that provision for travellers is in addition to the SM figure (but does not apply the same approach to affordable housing) and by the application of an 'affordability ratio' to derive the SM figure. The 'affordability ratio' for Winchester is high, as noted by various respondents, although the detailed ratio changes annually and has fallen for the last 2 years. In Winchester, this results in an 'affordability uplift' of more than 50% above the 2014 household projections for the District (which are themselves higher than up to date projections). Therefore, a large uplift is already built into the SM methodology and the SM already results in a much higher housing target than would be required to meet 'indigenous needs'. Furthermore, while NPPF footnote 28 specifically states that provision for travellers is in addition to the SM figure, it does not apply the same approach to affordable housing.

The PPG advises that *'the affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes'* (PPG ID: 2a-006-20190220). This suggests that the Government considers that affordable housing needs have already been sufficiently taken into account if the SM figure is used.

The PPG on the housing needs of different groups includes: *'...Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:*

- *the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);*
- *the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and*
- *the anticipated deliverability of different forms of provision, having regard to viability...'* (PPG ID: 67-001-20190722).

This confirms that when considering the needs of various groups (including for affordable housing) regard must be had to what is deliverable and viable.

The Strategic Housing Market Assessment 2020 assessed an annual affordable housing need totalling 343 dwellings per annum (220 affordable rented and 123 affordable home ownership). The Council has since published a focussed update of the Strategic Housing Market Assessment (SHMA update 2024) which has provided evidence to enable the affordable housing need figures to be updated. The Winchester Strategic Housing Market Assessment Update 2024 suggests the need for affordable / social rented housing has increased to about 368 dwellings per annum, with up to 142 additional dwellings needed per annum for affordable home ownership (figures relate to the Local Plan area, which excludes the South Downs National Park part of the District). This equates to up to 8,670 dwellings over the remaining Plan period (April 2023 onwards) and amounts to 56% of the total housing provision proposed by the Regulation 18 Plan (15,620 dwellings), with the majority of need being for affordable rented accommodation. Viability evidence that was published alongside the Regulation 18 Local Plan, and subsequently updated, shows that this percentage is not achievable in current market conditions and the ability to achieve this level of provision is also limited by Government policy which excludes provision by schemes of under 10 dwellings, self-build, prior notification schemes, etc.

Policy H6 of the Plan recognised these constraints and proposed a general requirement of 40% affordable housing, reduced in specific circumstances to 'not less' than 30% on brownfield sites (35% and 25% in the short term where phosphate issues apply). This tiered approach has been informed by ongoing viability assessment using the best estimate of costs, with the aim of following national planning guidance to provide clarity for all parties at the plan-making stage. But paragraph 9.34 of the Local Plan acknowledges that market-led schemes are not the only source of affordable housing provision. The Local Plan provides for affordable housing exceptions schemes (policy H7) and there is scope for affordable housing providers, community land trusts and the Council itself to develop land to meet affordable housing needs. The Council has a programme of Council house building (with a target of delivering 1000 dwellings by 2030) and has established a housing company to support the development of affordable housing.

Therefore, the Council is seeking to maximise affordable housing provision, within the constraints of Government policy and market conditions, to meet at least a substantial part of the need identified, and the SM figure should not be increased to enable additional affordable housing to be provided. Representations about the detail of affordable housing needs and policy are considered in relation to policy H6.

#### **Non-Delivery / Market Fluctuation / Flexibility Buffer**

Various development interests have commented that the Local Plan does not contain a 'buffer' to allow for market fluctuation, flexibility or non-delivery and argue that the NPPF requires this. They also criticise the use of the term 'buffer' within the Plan to refer to an allowance for unmet needs and/or changes to the SM. It is recommended that the Regulation 19 Local Plan should specify a firm contribution towards unmet needs (see above) and that the SM figure should be fixed. Therefore, it is agreed that references to the 'buffer' should be removed from the Plan, albeit that these do not appear in policies H1-H3 themselves.

Many comments point to the reference at paragraph 74 of the 2021 NPPF to buffers of 5%, 10% or 20% and suggest the Plan needs to include such a buffer. The December 2023 NPPF removes the requirements for buffers except where there has been significant under-delivery of housing (now at NPPF para 77). In any event, this guidance deals with maintaining a 5-year supply of land, not with setting the Local Plan housing target: NPPF paragraph 75 requires that authorities '*monitor their deliverable land supply against their housing requirement, as set out in adopted strategic policies ...*'. The housing requirement is established in the Local Plan in accordance with NPPF paragraph 61, whereas references to a 'buffer' relate to the 5-year supply of sites that is updated annually.

Therefore, the SM figure should not be increased to add a buffer, whether for market fluctuation, flexibility or non-delivery.

### **Economic Growth / Growth Strategies**

The PPG sets out several circumstances where it may be appropriate to plan for higher figures than the SM and the examples given include: '*growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals)*' (PPG ID: 2a-010-20201216). Some comments on the Local Plan also suggested that housing requirements should be higher to promote economic growth or support the strategy of the Local Economic Partnership (LEP).

There is no specific growth strategy or Housing Deal in place for Winchester. The M3 Local Economic Partnership is in the process of developing a Local Industrial Strategy and published [Local Industrial Strategy - Defining Our Approach](#) in 2020. This identifies the importance of housing and place-making to economic success and promotes building the right homes in the right places. It does not set any targets for housing growth or refer specifically to Winchester. There is, therefore, no 'growth strategy' in place for the area or specific funding for housing growth.

Additionally, the Government announced in August 2023 that its support for LEPs would be withdrawn from April 2024 and that LEP functions should be transferred to local authorities. The authorities that have received this function (Hampshire County Council in

Winchester’s case) have not yet developed a strategy. Therefore, the SM figure should not be increased to provide for additional economic growth in view of the lack of strategies to achieve this.

**Other Factors**

The other circumstances which the PPG gives as examples of where it may be appropriate to plan for higher figures than the SM are to address unmet needs (dealt with above) and: ‘*strategic infrastructure improvements that are likely to drive an increase in the homes needed locally*’ (PPG ID: 2a-010-20201216).

The only infrastructure projects in the District which might be described as ‘strategic’ are the proposed upgrading of the M3 motorway, particularly junction 9 (which is not aimed at increasing development capacity) and infrastructure provision in conjunction with the three strategic development allocations in the District. These strategic allocations are carried forward in the Plan (policies W1, SH1, SH2) and the housing targets for those at West of Waterlooville and North Whiteley have been increased. The scope for further provision at these planned development areas is limited by the constraints of the sites and is likely to require new infrastructure provision rather than making use of existing or planned infrastructure. Therefore, the SM figure should not be increased on the basis of planned strategic infrastructure improvements.

It is concluded that there is justification for increasing the SM figure to help towards meeting unmet housing needs in the PfSH area, but that other factors such as affordability, economic growth, etc do not justify a further increase.

**Recommended response:** No change.

**Housing Supply / Delivery (Commitments, Brownfield Sites, Windfall, etc)**

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| <p>ANON-KSAR-NKTJ-8<br/>BHLF-KSAR-N867-4</p> <p><b>(2 comments)</b></p> | <p>The text, figures and supporting evidence on windfall should be consistent but the evidence base cites a 15 year windfall allowance of 115 dwellings per annum totalling 1,725 but this increases to 1,975 within Table H2 with a base date of April 2021. With the 15 year period commencing in April 2024, this does not account for the increase in windfall allowance by some 250 dwellings. The Council should</p> | <p>Comments noted, see general response on this issue below.</p> <p><b>Recommended response:</b> Amend the Local Plan to update the figures for housing provision in Table H2 and paragraph 9.18.</p> |
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|  | therefore either update the evidence base to justify 1,975 dwellings, or amend Table H2.  |  |
| ANON-KSAR-NKG5-6<br>Crawley Parish Council                                 | Support the aim to build on brownfield sites but disappointed that many of the proposed allocations are on agricultural land. Nearly 30% of the proposed houses are allocated to the market towns and rural settlements which have some of the highest carbon footprints. Many are not well served in terms of public transport, broadband connectivity, heating infrastructure, wastewater management. Building in these areas would not support WCCs aim to become carbon neutral by 2030.  | Comments noted, see general response on this issue below. The Plan seeks to make full use of brownfield sites but it is not possible to avoid some greenfield allocations in order to meet the level of housing provision required.<br><b>Recommended response:</b> No change. |
| <a href="#">BHLF-KSAR-N8R2-U</a><br><a href="#">Hursley Parish Council</a> | <p>Strongly support the use of previously developed land (brownfield land) ahead of green field rural sites. While a handful of these sites are valued by local communities and wildlife, the vast majority are available for a new use. Most brownfield land is located within urban areas, often in locations suitable to make the most of existing infrastructure, transport and services, and where many people want to live. It follows that brownfield land is a highly sustainable location for development. Claims that there is no brownfield land in a district are rarely correct. NPPF paragraphs 119-125 contain quite extensive guidance on making effective use of land and minimising the use of greenfield sites.</p> <p>An Urban Opportunities Study is a proactive way to meet this obligation and to find brownfield land. Local planning authorities should adopt a sequential, hierarchical approach to the allocation of sites for new development as this will lead to the most effective and sustainable use of land. The principle of Brownfield First needs to underscore this approach, then in sequence as necessary to meet housing</p> | Comments noted, see general response on this issue below. The Plan seeks to make full use of brownfield sites but it is not possible to avoid some greenfield allocations in order to meet the level of housing provision required.<br><b>Recommended response:</b> No change. |

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|                  | <p>numbers, and as is consistent with local character and distinctiveness and a landscape-led policy:</p> <ul style="list-style-type: none"> <li>• increased densities in existing allocations</li> <li>• adopt windfall allowances, both for small sites and a large site.</li> <li>• use of under-utilised land and buildings</li> <li>• urban regeneration</li> <li>• use of car parks - build over to leave the car park as undercroft</li> <li>• re-allocation of land from other current uses</li> <li>• suburban densification</li> <li>• small urban sites</li> <li>• small rural sites to meet local need.</li> </ul> <p>Only as a last resort should greenfield land be allocated for housing, using a Landscape-led approach. In any event Valued Landscape should be avoided if at all possible. The emerging Local Plan should have a strategy and policies to implement these principles.</p> |   |
| ANON-KSAR-NK21-D | <p>Object to the inclusion of outstanding planning permissions (8,560) and other commitments (892) without applying any deduction for non-implementation. There should be a 10–15% deduction, which would equate to a reduction of between 945 and 1,418 dwellings. These should be found from other sources, typically additional allocations.</p>   | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> Amend the Local Plan to update the figures for housing provision in Table H2 and paragraph 9.18.</p> |
| ANON-KSAR-NKJV-A | <p>Whilst the district is currently able to demonstrate a 5-year housing land supply, 15,620 homes would provide little or no flexibility to ensure that a rolling five-year supply is maintained. The supply is dominated by three major development sites which will normally take a longer period to come forward, are often more complex from a viability perspective, and take longer to agree. The likely impact on delivery indicates the need for greater flexibility.</p>  | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> No change.</p>   |

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| <p>ANON-KSAR-N81F-E</p> | <p>Note that the strategy is ‘brownfield first’ but there is no housing trajectory with the Regulation 18 Plan so it is not possible to see which sites are phased early in the Plan period. There is no Urban Capacity Study so it is not demonstrated that the brownfield policy is deliverable. The Brownfield Land Register has a total of 33 sites (19.7 hectares of land) with an estimated yield of just 485 dwellings. The single largest site is 98 dwellings at Morgan’s Yard, Waltham Chase. Even if Sir John Moore Barracks is added at the maximum estimated capacity (1,000 dwellings), the total yield from the BLR is 1,485 dwellings or c. 9.5% of housing provision. It is hard to see how such low capacity of brownfield land justifies a brownfield first approach.</p> <p>The Plan acknowledges that brownfield sites have longer lead in times, which again questions the brownfield first approach. These sites are phased towards the earlier parts of the plan period which is illogical when they have longer lead in times. The emphasis given to brownfield first should also be reviewed as such sites are typically more complicated and expensive to develop which puts pressure on the levels of community benefit and affordable homes that they can sustain. The Plan should encourage previously developed sites whilst not artificially constraining available and suitable greenfield sites, which are capable of delivering affordable homes more quickly and in greater numbers.</p> | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> Amend the Local Plan to update the figures for housing provision in Table H2 and paragraph 9.18.</p> |
| <p>ANON-KSAR-N8QS-U</p> | <p>The strategy consists largely of a “roll forward” of existing allocations and other policies, with over 70% of overall provision accounted for by completions, commitments and existing allocations and only 7% of new allocations. As a</p>  | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> Amend the Local Plan to update the figures for</p>   |

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|  | <p>result housing delivery is suppressed, especially after 2031, and there is minimal scope to shape forms and patterns of development in support of lower-carbon patterns of travel. In addition, it allows for previously consented large-scale development to be re-attributed nominally to meet requirements arising within the district. In effect this is “robbing PfSH to pay Winchester” and will compound patterns of car-borne long-distance movement.</p> <p>The “brownfield” first approach is congruent with the NPPF. These sites are often located within existing settlements, are relatively sustainable and can be well suited to active travel and public transport use. Greenfield development can be relatively hard to provide highly competitive sustainable travel choices.</p> <p>This assumes that a sufficient supply of such sites is available but we are not clear from the evidence presented that this is the case. The Central Winchester Regeneration Area and Station Approach Regeneration Area have been rolled over from the current Local Plan, and have been the focus of redevelopment aspirations for well over a decade. We support these allocations, lying at the heart of the public transport network of the City but the reliance on such sites to meet housing need, especially prior to 2030, is likely to prove ill-founded.</p> <p>Reliance on complex and costly redevelopment proposals also presents significant viability challenges resulting in reduced affordable housing provision. Demolition and remediation also involves challenges dealing with waste material. We are concerned that WCC does not intend to</p> | <p>housing provision in Table H2 and paragraph 9.18.</p> |
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|                  | release any greenfield sites until 2030, making the plan strategy highly dependent on PDL, especially in and around Winchester where there is a relatively limited stock of consents.  |   |
| ANON-KSAR-NKJ4-8 | <p>The strategy is strongly focussed on sites which already benefit from planning permission, but some have been allocated since 2013 and are yet to come forward. 1,055 homes allocated within the draft Local Plan were also allocated under LPP2, with strategic allocations of North Whiteley, Barton Farm and West of Waterlooville forming allocations within LPP1. The Draft Local Plan and evidence base does not present any new information to explain whether the sites meet the definition of deliverable.</p> <p>Allocations carried forward from the previous Local Plan should be updated and this may necessitate further housing allocations.</p>   | <p>Comments noted, see general response on this issue below.</p> <p><b>Recommended response:</b> Amend the Local Plan to update the figures for housing provision in Table H2 and paragraph 9.18.</p>   |
| ANON-KSAR-NKUC-2 | <p>The brownfield-first phased approach is unnecessary, unjustified, ineffective, and inconsistent with national planning policies.</p> <p>Whilst the redevelopment of previously developed land finds support in the NPPF, it does not refer to a brownfield-first approach. It is not clear why previously developed land should come forward more easily and quickly than greenfield sites. Brownfield sites are often already occupied or may otherwise be subject to constraints. The Lichfield's 'Start to Finish' report (2020) into the delivery of development sites finds that large brownfield sites deliver at a slower rate than greenfield sites, therefore the reliance on brownfield sites in the first half of the Plan-period is likely to cause under-delivery.</p> | <p>Comments noted, see general response on this issue below. The existing Local Plan covers the period to 2031 so it is not surprising or problematic that some of its larger allocations have not yet been fully developed. The deliverability of Sir John Moore Barracks and other sites is considered in more detail in relation to the relevant site allocations policy.</p> <p><b>Recommended response:</b> Amend the Local Plan to update the figures for housing provision in Table H2 and paragraph 9.18.</p> |

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|  | <p>The strategy is very heavily focussed on sites that are already allocated and/or which benefit from planning permission. These may not be successfully developed and there is ambiguity concerning the number of completions to-date. The Plan and associated evidence base does not present new information to explain how and when constraints can be overcome and there appears to be some discrepancy between the number of homes the allocations are expected to provide for when compared to the latest Annual Monitoring Report (AMR) (2021).</p> <p>For example, Barton Farm was allocated in LPP1 for 2,000 homes, the allocation remains in the Draft for 2,000 homes but the AMR suggests the supply is 1,806 homes. West of Waterlooville was allocated for 3,000 homes and Draft Plan suggests 1,440 remain, suggesting that 1,600 homes have been completed, yet in the AMR there are 1,019 completions overall. Conversely at Bishops Waltham allocations at The Vineyard / Tangier Lane and Albany Farm benefit from planning permission and are being built out, but are forecast to be complete by 2024/2025. The Plan-period should commence in 2025 so these sites would not contribute to supply within an updated Plan-period of 2025 to 2040.</p> <p>The Draft Local Plan proposes 900 homes at Sir John Moore Barracks but suggests that 750 to 1,000 could potentially be delivered, highlighting the lack of certainty around this allocation. A number of constraints are identified and it is not clear when this site will become available. We have no</p> |  |
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|                         | <p>in-principle objection to the redevelopment of this brownfield site but the Plan is heavily reliant on previously developed sites and the assumption that such sites can come forward before allocations on greenfield land.</p>   |   |
| <p>ANON-KSAR-NK2A-W</p> | <p>Delivery from existing planning permissions and completions is noted, but the main purpose of this review is to positively plan for additional housing needs. The strategy would see only 66% of the remaining requirement addressed through direct allocations, with 33% through windfall, which offers far less certainty. This is a radical change from previous Local Plans, where delivery was secured through direct allocations, which has been successful in maintaining a 5-year housing land supply.</p> <p>Windfall development needs to be supported by compelling evidence and over-reliance based on past trends is flawed as such trends may not continue in the same manner. Legislation brought a significant relaxation of permitted development rights but there is no guarantee that conversions will be carried out at the same rate in the future. The number of suitable and available sites will reduce over time unless the settlement boundary is expanded. There is no guarantee that development will come forward on the most sustainable sites within each settlement and reliance on windfall undermines the delivery of infrastructure and affordable housing.</p> <p>The Windfall Paper has a total District wide figure of 1,725 dwellings but the Local Plan proposes 1,975 windfall homes resulting in a 250 home deficit. The Local Plan allocates 450 homes to rural areas whereas the windfall assessment gives MTRA4 areas a windfall of 150. This needs to be</p> | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> Amend the Local Plan to update the figures for housing provision in Table H2 and paragraph 9.18.</p> |

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|                  | <p>explained and justified.</p> <p>The windfall allowance should be reduced and the shortfall replaced with new site allocations so that development is directed to the most sustainable sites.</p>   |  |
| ANON-KSAR-NK21-D | <p>Windfall is inevitably a finite resource and the Council should evidence the approach more fully and apply a discount of 10–15%, particularly given the approach taken to prioritising previously developed land and limiting development in the countryside. The windfall allowance should be reduced by between 197 and 296 dwellings.</p>   | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> No change.</p>  |
| ANON-KSAR-NKZU-S | <p>It is accepted that windfall will strongly contribute to the delivery of housing but the reliance on windfall development to deliver 12% when residential, commercial, leisure schemes become scarcer would not constitute proactive planning. The Market Towns and the Rural Area has a requirement for 450 of these homes through policy H3 and additional SHELAA sites should be considered for allocation.</p> | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> No change.</p>  |
| ANON-KSAR-NKJC-Q | <p>We do not oppose inclusion of a windfall supply element but this should be limited to small sites to avoid duplication with sites now proposed for allocation, particularly in regeneration areas where changes of use have previously occurred.</p>   | <p>Comments noted, see general response on this issue below. There is no duplication, as previously-allocated sites are excluded from the windfall projections.<br/> <b>Recommended response:</b> No change.</p> |
| BHLF-KSAR-N8BS-C | <p>The housing provision allows for a significant windfall allowance (1,975 dwellings). Given the plan is having to allocate additional land outside development limits, it is difficult to see how the levels of windfall are likely to be retained. The NPPF requires compelling evidence that windfall will provide a reliable source of supply but it is not clear where the windfall allowance will be met.</p>  | <p>Comments noted, see general response on this issue below.<br/> <b>Recommended response:</b> No change.</p>  |

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| BHLF-KSAR-N8Z1-2 | The 1,975 dwellings allocated to windfall development represent a high proportion of unplanned development and there should be further allocations to lessen the reliance on windfall development.  | Comments noted, see general response on this issue below.<br><b>Recommended response:</b> No change.  |
| ANON-KSAR-N81F-E | There is a significant allowance included for windfall sites across the three spatial areas over the plan period, equivalent to around 12% of Housing Provision. Whilst the evidence base shows that previous windfall allowances may have been overly cautious, this is missing an opportunity to better plan for meeting local needs. More allocations plan would give a greater reliability of delivery and deliver more affordable housing. Heavy reliance on windfalls is counterproductive to the key priority of improving affordability. A more robust way to ensure the key priority of affordability would be to rely less on potential windfall and include more site allocations.   | Comments noted, see general response on this issue below.<br><b>Recommended response:</b> No change.  |
| ANON-KSAR-NKUC-2 | <p>Do not believe there is ‘compelling evidence’ to justify the contribution from windfall. It is not clear why the Plan should identify a greater annualised windfall supply than in the Windfall Assessment Report, which also appears to overestimate the likely supply. It includes ‘conversions’, but does not provide any details regarding the availability of agricultural buildings for conversion. Similarly, with redevelopment / conversion of commercial or leisure uses there is not an analysis of urban capacity.</p> <p>In addition, in Table H3 completions of under 10 dwellings have been identified as a source of supply, which is not appropriate. Also, it is not clear if a lapse rate has been applied to this figure. Accordingly, do not agree that proposed approach to windfall supply is sufficient to satisfy the NPPF.</p> | Comments noted, see general response on this issue below. It is not appropriate to apply a ‘lapse rate’ to completions, whether on small or large sites.<br><b>Recommended response:</b> No change. |

## General Response on Housing Supply / Delivery

There are several sources of housing supply to meet the identified housing requirement, all of which have been subject to comments, mainly from development interests questioning the assumptions made or deliverability. These are considered below.

### **Existing Housing Completions and Commitments**

Various respondents suggest that the Plan period should not be 'backdated' to allow for past completions to be taken into account. This issue is discussed in the section above regarding the Plan period. However, once the start of the Plan period is fixed, it is entirely legitimate and normal to count any housing completions towards the housing requirement. Housing completions are monitored by Hampshire County Council on a County-wide basis, so the information is accurate and up to date. There is obviously absolute certainty about the delivery of completions as they have already been delivered.

With regard to 'commitments', these comprise dwellings with planning permission (full or outline) at the base date and dwellings from existing Local Plan allocations that have not already been taken into account (as completions or planning consents). Table H2 of the draft Local Plan showed that existing planning consents amounted to 8,560 dwellings at April 2021 and existing Local Plan allocations were 892 dwellings, giving a total of 9,452 dwellings. Commitments are obviously a very substantial part (60%) of the housing supply, reflecting the ongoing development of the 3 strategic allocations (West of Waterlooville, North Whiteley and Barton Farm), as well as smaller Local Plan allocations and other permitted sites. Various development interests suggest that the Plan is overly reliant on commitments (and completions), particularly brownfield sites, and does not allocate sufficient new sites. Some also question the deliverability of all of these dwellings. However, it is entirely legitimate that existing commitments should be taken into account before assessing the scale of new allocations needed, and it is expected that in general existing commitments will be at least as likely to be delivered as new allocations especially when development has started on West of Waterlooville, North Whiteley and Barton Farm.

In terms of deliverability of planning consents, these are considered to have a very high prospect of being achieved. Winchester District has a strong housing market and very few planning consents are found to lapse or remain uncompleted. If there is evidence of this they are removed from the schedule of commitments, which is also maintained annually by Hampshire County Council. The NPPF's definition of 'deliverable' includes all small sites with consent and all sites with full/detailed consent, unless there is clear evidence that homes will not be delivered (NPPF Annex 2: Glossary). The Council's 2023 Authorities Monitoring Report indicates that 3,516 dwellings were considered to be 'deliverable' within 5 years on this type of site (half of all existing planning consents). Of

the remaining 3,500 dwellings with consent, some 2,550 are in the 3 strategic allocations, which are expected to continue deliver housing over much of the Local Plan period. Others tend to be on other larger sites or sites that currently have only outline consent, which are all considered deliverable beyond the 5 year period, but within the Plan period.

The 892 dwellings expected to come from outstanding Local Plan allocations are carried forward as allocations in the draft Local Plan (except for a small number within the South Downs Local Plan which the SDNP Authority has confirmed are expected to be delivered). Comments regarding the deliverability of these allocations are considered in the sections on the relevant site allocation policies. However, the deliverability of these dwellings will be tested through the Local Plan process, in the same way as the additional Local Plan allocations, discussed below.

### **Additional Local Plan Allocations**

Table H2 of the draft Local Plan showed that additional allocations for some 2,685 dwellings were made in the Plan, in accordance with the Plan's spatial development strategy, over and above the 892 dwellings in existing site allocations that are carried forward, giving a total of 3,577 dwelling allocations. A significant proportion of the allocations were in the Winchester Town spatial area (about 1,600), several in Council ownership, and there were additionally two 'broad location' type policies (W10 and W11). Some of the dwelling numbers involved are derived from student housing, where a dwelling equivalent was calculated as advised by the PPG. Elsewhere, there is modest expansion / intensification proposed at West of Waterlooville and North Whiteley (in the South Hampshire Urban Areas) and various allocations to the larger settlements in the Market Towns and Rural Area.

Various development interests question the deliverability of some allocations, particularly some of the carried forward sites that are not yet permitted, key brownfield sites, or the allowances made for the 'broad locations'. These responses are addressed in detail when considering comments on the site-specific allocation policies involved, but it is acknowledged that a reasonable prospect of delivery will need to be demonstrated for all site allocations (new or carried forward).

In general terms, all site promoters have confirmed the availability and deliverability of their sites through the Strategic Housing and Employment Land Availability Assessment (SHELAA) process. The owners / promoters of sites allocated in the draft Local Plan were sent Site Delivery Statements following the Regulation 18 consultation, asking in detail about any constraints in terms of site ownership, covenants / restrictions, infrastructure requirements, viability, etc. These have been followed up as necessary to ensure that any issues can be overcome and adjustments have been made to the relevant site allocation policies, if necessary, including to their estimated capacity.

The NPPF expects planning policies to identify *'specific, deliverable sites for years one to five of the plan period'* and *'specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan'* (NPPF, para 68). Because of the high level of existing commitments underway and the priority given to brownfield sites, new greenfield allocations are phased from 2030 onwards, or years 6-15 from adoption (policy H2 and site allocation policies). A housing trajectory has been produced, which was summarised in broad terms by the graph on page 231 of the draft Plan. The assumptions underlying this have been updated to take account of the site deliverability questionnaires and comments on / changes to specific site allocation policies.

### **Windfall Allowance**

Table H2 of the draft Local Plan indicates that an allowance for 1,975 dwellings has been made for windfall development. Some respondents question whether this is justified or point to the [Assessment of Windfall Trends and Potential](#) (Windfall Study 2021) which concludes that a total of 1,725 dwellings would be justified over a 15 year period, rather than 1,975. Paragraph 6.1.6 of the Windfall Study does conclude that a windfall allowance of 115 dwellings per annum (1,725 over 15 years) is justified as a modest estimate of future windfall. However, this paragraph is clear that this excludes the SDNP area, so Table H2 added an allowance of 250 dwellings for the National Park part of the District, giving the 1,975 total. SDNP officers had agreed that a windfall allowance of 280 would be a reasonable assumption, so the District total could potentially be slightly above 2,000 dwellings. The contribution of dwellings in the SDNP part of the District is being reviewed, as discussed in section 4 above and these figures will be updated as necessary in the Regulation 19 Plan.

The Windfall Study sets out a detailed assessment of development over the period 2012-2019, taking care to identify sites that were allocations or SHELAA sites, so as not to double-count them as windfall. It assesses the sizes of sites coming forward and what type of sites were involved (conversion, commercial, gardens, etc). Some respondents suggest that there could be double-counting, but the Windfall Study has been careful to ensure that this is not the case. It also only applies the windfall allowance to the latter 15 years of the Plan period, so as to avoid double counting sites that already have consent. It concludes that the previous windfall study covering earlier years had significantly under-estimated windfall and that the estimate of 115 dwellings per annum is a modest one, especially compared to actual windfall completions over the study period of over 200 per annum.

Some respondents suggest that some of the assumptions about the type of sites that will come forward may not prove to be correct or that the estimate should be discounted by 10% or 15%. However, the Windfall Study is a detailed assessment which is considered to provide the *'compelling evidence'* required by the NPPF (paragraph 71), as well as being modest in its assumptions. It takes account of exactly the factors that are suggested by the NPPF: *'...the strategic housing land availability assessment, historic windfall delivery rates and expected future trends...'* (NPPF para 71). While there may be an argument for applying a discount if the



Windfall Study had simply projected forward total past windfall levels (of 200+ dwellings per annum), it does not do this and contains only a modest estimate of future annual completions (of 115 dwellings per annum, little more than half of recent levels).

Some respondents question the accuracy of the windfall estimates that are attributed to the main settlements in the 'Housing Sources' tables in the Development Allocations Chapters of the draft Plan. It is correct that the Windfall Study does not attribute windfall estimates to most individual settlements, so the figures in these tables are generally estimates. However, they are based on the expected levels of windfall in the relevant spatial areas and the windfall estimates are not critical at the settlement level, as the settlement housing requirements are for *'new sites to be allocated'*. It is appropriate to make an allowance for windfall at the District level but it is not critical whether the estimates prove to be exact for each settlement.

### **Brownfield Sites**

Previously developed land, or 'brownfield' sites, form a component of all the above sources of supply: completions, commitments / planning consents, new / carried forward Local Plan allocations, and windfall. While it is recognised that some sites can be complex and time-consuming to bring forward, this tends to apply mainly to the largest sites, which are usually subject to a site allocation policy. The likely constraints are taken into account in assessing the estimated capacity and timing of the relevant site.

Government policy is clear that full use should be made of available brownfield sites: *'strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land'* (NPPF, paragraph 123). The Plan is, therefore, right to prioritise brownfield sites, where these can be delivered within the Plan period. Encouragement is given through various policy measures, including the requirement for a lower level of affordable housing provision to reflect potential viability concerns. While the Local Plan prioritises brownfield sites, it does not adopt a 'brownfield first' approach, in the sense of expecting all brownfield sites to be delivered before greenfield, or holding back greenfield development until specific brownfield sites are developed. The Plan therefore *'makes as much use as possible'* of brownfield sites but also provides for greenfield development, both through existing consents and allocations and new site allocations.

In conclusion, it is recognised that the capacity estimates for the various sources of supply needs to be updated and that delivery continues to need to be demonstrated. The evidence base does this, and new or carried forward housing allocations will be reviewed to ensure the capacity estimates are deliverable. The relevant parts of the Local Plan should be updated accordingly for the Regulation 19 version.

**Recommended response:** Amend the Local Plan to update the figures for housing provision in Table H2 (page 229) and paragraph 9.18 (page 230), as follows:

‘Table H2 – **Winchester District** Housing Need and Provision

| Winchester District Housing Need   |                         | Winchester District Housing Provision                             |                         |
|--|-------------------------|---|-------------------------|
| Standard Method need for Plan period <b>2020-2040</b> (see Table H1 x 20 years)                              | <b>13,565</b><br>14,178 | Completions since start of Local Plan period ( <b>2020-2023</b> ) | <b>3,170</b><br>1,517   |
| <b>Unmet Needs Allowance</b> ‘Buffer’ (for Standard Method changes / unmet need in neighbouring authorities) | <b>1,900</b><br>1,450   | Outstanding planning permissions                                  | <b>6,780</b><br>8,560   |
|  |                         | Other Commitments (previous Local Plans incl. SDNP)               | <b>745</b><br>892       |
|  |                         | Windfall development  | <b>1,895</b><br>1,975   |
|  |                         | Additional allocations made in this Local Plan                    | <b>2,875</b><br>2,685   |
| Total <b>District</b> Housing Requirement  | <b>15,465</b><br>15,628 | Total <b>District</b> Housing Provision*                          | <b>15,465</b><br>15,629 |

\* Includes **approximately 350** dwellings within the South Downs National Park part of Winchester District.

9.18 Table H2 shows that sufficient housing provision is proposed to meet the Winchester District housing requirement, which includes **an estimated 350** dwellings within the South Downs National Park part of the district and **an unmet needs allowance** ‘buffer’ of **1,900** dwellings in case of changes to the Standard Method or as a contribution towards the unmet needs of neighbouring areas in South Hampshire. **The remaining requirement for the Local Plan area (excluding the estimated 350 in the South Downs National Park part of the District) is 15,115 dwellings.** Some 64% of the **District** requirement is met by dwellings that have either been completed or which already have planning consent...’

**Spatial Areas / Distribution**

|  |  |  |
|--|--|--|
| <p>ANON-KSAR-NKJV-A<br/>ANON-KSAR-N8YM-W<br/>ANON-KSAR-NKAB-D</p> <p><b>(3 comments)</b></p> | <p>Agree with the principle of new housing across the three identified spatial areas: Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Area. All three areas are critical to delivering the district's growth requirements. The targets for new homes in each spatial location must not be a maximum, but a minimum.</p>  | <p>Comments noted. Comments regarding the housing requirement are considered in separate sections above.<br/><b>Recommended response:</b> No change.</p>   |
| <p>ANON-KSAR-N8M8-V<br/>BHLF-KSAR-N87Z-8</p> <p><b>(2 comments)</b></p>                      | <p>The committed growth and extensions proposed in the SHUA part of the district (5,702) should be allocated to meeting the shortfalls in the wider PfSH area. The housing figure (15,620) should be increased by increasing growth assigned to Winchester Town as a proactive response to addressing unmet housing needs from the PfSH area and to facilitate reductions in commuting flows into the main urban area. As part of a positive response to structural challenges that exist within the housing market a positive decision to allocate further MDA scale development at Winchester (land to the north of Wellhouse Lane promoted) would increase the potential for 40% affordable housing to be delivered.</p> <p>The allocation to the Market Towns and Rural Area should be 'modest' (as suggested by the Vision) and is too high at 27% of the growth planned for the district. The distribution proposed is too evenly spread to meet the stated objectives of the Plan and does not tackle climate change.</p> <p>Maintaining the existing spatial distribution of employment across the district would mean that Winchester Town would generate 5,150 additional jobs within the plan period, which would require around 6,000 new homes to be planned for at Winchester Town to maintain the status quo. Over 7,000 new homes would be needed to reduce commuting flows by</p> | <p>Comments noted. Comments regarding unmet housing needs are considered in separate sections above and comments on the spatial strategy are considered in relation to policy SP2.<br/><b>Recommended response:</b> No change.</p> |

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|   | <p>10% and a higher increase could achieve a more pronounced reversal. The strategy does not include a specific uplift to address the affordability challenges at Winchester, and the Council should consider this as part of a positive response to structural challenges that exist within the housing market.</p>   |  |
| <p>ANON-KSAR-N85K-Q<br/>BHLF-KSAR-N8ZD-N</p> <p><b>(2 comments)</b></p> | <p>The Plan's strategy for relies heavily on existing allocations and previously developed sites and fails to adequately apportion growth to the 'Market Towns and Rural Area'. There is a case for achieving growth at Winchester and within the South Hampshire Urban Area, but the focus on these areas not always proved effective. North Whiteley has averaged only 100 dwellings per annum and has not been capable of supporting affordable housing provision at policy compliant levels. Sites available within the Market Towns and Rural Area are typically small / medium-sized and are often self-contained. Existing settlements provide opportunities to facilitate sustainable growth without reliance on new strategic infrastructure that has proved challenging to bring forward.</p> <p>The housing requirement will need to increase significantly and new sites will need to be allocated. The Plan must improve the volume and diversity of housing supply through the allocation of additional sites within the Market Towns and Rural Area. This will help reinforce the vitality of existing infrastructure and amenities, and urban growth at Winchester or the South Hampshire Area cannot address issues of rural housing affordability or prevent 'rural stagnation'.</p> | <p>Comments noted. Comments regarding the housing requirement and land supply are addressed in separate sections above.</p> <p>It is not accepted that North Whiteley has only averaged 100 dwellings per annum as it was started in recent years and delivered over 300 dwellings in 2021-22 and over 400 in 2022-23. If additional sites need to be allocated they will be selected in accordance with the Plan's spatial strategy and based on site suitability.</p> <p><b>Recommended response:</b> No change.</p> |

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| ANON-KSAR-NKJV-A | <p>There is a need to increase housing provision across the 3 spatial areas and to deliver affordable housing. The Market Towns and Rural areas have capacity to increase housing provision so as to achieve sustainable growth and ensure that services and facilities can continue to be provided.</p> <p>Wickham is a sustainable settlement and one of the higher-ranking settlements within the Settlement Hierarchy Review (2021). There are sustainable options for growth at Wickham which would support and maintain existing services and facilities within the town (site at Mill Lane promoted as a sustainable location for new homes with many locational advantages).</p> | <p>Comments noted. Comments regarding the housing requirement are addressed in separate sections above.</p> <p>If additional sites need to be allocated they will be selected in accordance with the Plan's spatial strategy and based on site suitability. Comments regarding particular settlements are considered in the sections relating to those settlements.</p> <p><b>Recommended response:</b> No change.</p> |
| ANON-KSAR-NKHA-K | <p>Wickham is classified as a "larger rural settlement" and it is proposed it will be allocated additional provision of 85 – 200 dwellings. The independent village survey conducted in 2018-19 demonstrated opposition to additional housing. There is support for affordable housing for local people and there is a planning application in process for 200 new homes at Ravenswood, Knowle. This allocation should be the total required in the settlement in the plan period.</p>   | <p>Comments noted. Opposition to housing development is not in itself a justification for not allocating land for development. Comments regarding particular settlements are considered in the sections relating to those settlements.</p> <p><b>Recommended response:</b> No change.</p>  |
| ANON-KSAR-N85W-3 | <p>West of Winchester and Waterlooville/Denmead are well placed to accommodate unmet need due to locations close to Portsmouth, Southampton and the New Forest respectively. Housing provision for Denmead should be increased to support delivery of affordable housing and to address the unmet needs of adjoining authorities, in particular Portsmouth.</p>  | <p>Comments noted. Comments regarding the housing requirement are addressed in separate sections above.</p> <p>Comments regarding particular settlements are considered in the sections relating to those settlements.</p> <p><b>Recommended response:</b> No change.</p>  |
| ANON-KSAR-N8SU-Y | <p>Object to large-scale greenfield development in Micheldever, which can't absorb such huge development. The council should focus on brownfield sites because once</p>  | <p>Comments noted. The Local Plan does not propose development at Micheldever and this option was</p>  |

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|                  | <p>the countryside has been built on it's gone forever. Councils should bring back to use empty and derelict houses and shops and convert these into homes.</p>   | <p>rejected following the Strategic Issues and Priorities consultation.<br/><b>Recommended response:</b> No change.</p>  |
| BHLF-KSAR-N8R4-W | <p>Appreciate the national need for housing, but concerned that another 100 homes in Colden Common will necessitate building on surrounding countryside and that the extra traffic will add considerably to the volume, speed, noise and pollution of the very heavy traffic along this road.</p>   | <p>Comments noted. Comments regarding particular settlements are considered in the sections relating to those settlements.<br/><b>Recommended response:</b> No change.</p>   |
| BHLF-KSAR-N8ZF-Q | <p>The proposed housing distribution should reflect the PfSH area and the contribution towards the PfSH area from Market Towns and Rural Areas should be included with the figure given for the South Hampshire Urban Areas. Greater emphasis should also be given to delivering housing within South Hampshire to help meet the unmet needs from the PfSH authorities.</p>   | <p>Comments noted. Comments regarding unmet needs are addressed in separate sections above.<br/><b>Recommended response:</b> No change.</p>  |
| ANON-KSAR-N8QS-U | <p>There is a clear, significant and pressing need for affordable housing in the City of Winchester, where the vast majority of employment is located. We are a substantial local employer and service provider and face difficulty recruiting staff to maintain our operation. Housing costs across a range of tenures relative to earnings are among the highest in the UK. This problem is not merely local but has a very clear local impact. National and local policy is seeking greater availability and quality of public transport. For this to be deliverable requires affordable accommodation in much greater numbers and as soon as possible.</p> <p>The SHMA provides evidence that the majority of affordable housing should be within or adjoining Winchester Town, as this is the area with the greatest need. Furthermore, the existing problems of traffic congestion can be explained by the imbalance of jobs to homes in the City and the</p> | <p>Comments noted. Comments regarding housing affordability are addressed in separate sections above and in relation to policy H6.</p> <p>Winchester had the highest number of new site allocations in the Local Plan reflecting the fact that it is a highly sustainable location, but it is also heavily constrained and there are housing needs in other parts of the District as well.<br/><b>Recommended response:</b> No change.</p> |

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|                         | <p>consequential house price differentials. To continue to suppress housing delivery at the City while looking at a dispersed pattern of development towards the south can only perpetuate and aggravate the transport problems of the city.</p>  |  |
| <p>ANON-KSAR-NKUC-2</p> | <p>The Plan's strategy fails to adequately apportion growth to the 'Market Towns and Rural Area' category. Winchester and within the South Hampshire Urban Area have not always provided effective growth. North Whiteley has averaged only 100 dwellings per annum and has also not provided affordable housing at policy compliant levels. Sites in the MTRA are typically small / medium-sized in scale and settlements include services and infrastructure.</p> <p>The housing requirement fails to properly account for unmet need within the PfSH area and the housing requirement needs to increase significantly. The Plan must look to supply through allocation of additional sites within the MTRA. Neither growth at Winchester nor within the South Hampshire Area, can address issues of rural housing affordability or 'rural stagnation'.</p> <p>There are strong reasons for a greater apportionment of housing within the MTRA, including at Wickham, which is the fifth most sustainable settlement within the Plan area. Policy WK4 ('Land North of Ravenswood House'), is located at Knowle which is a lower tier settlement. The Draft Local Plan appears to adopt the Parish boundary as the unit of analysis without any reasonable justification. The IIA confirms that this site performs poorly when compared to alternatives.</p> | <p>Comments noted. Comments regarding the housing requirement and unmet needs are addressed in separate sections above. Comments regarding particular settlements are considered in the sections relating to those settlements.</p> <p>It is not accepted that North Whiteley has only averaged 100 dwellings per annum as it was started in recent years and delivered over 300 dwellings in 2021-22 and over 400 in 2022-23. If additional sites need to be allocated they will be selected in accordance with the Plan's spatial strategy and based on site suitability.</p> <p><b>Recommended response:</b> No change.</p> |

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|                            | Concern, that our site has been excluded from shortlist of sites in the Development Strategy and Site Selection report because it does not directly adjoin the settlement boundary. This is not a reasonable approach and is therefore arbitrary.   |   |
| <b><u>Other Issues</u></b> |   |   |
| ANON-KSAR-NK4R-G           | <p>The SHMA identifies a high need for older persons housing with a need for 1,171 additional units by 2036 (equivalent to 59 per annum). This represents 8% of the total housing requirement and is a significant proportion of the total requirement.</p> <p>For the plan to be consistent with national policy, justified and effective the needs of older people should be explicitly expressed within the plan. The plan should also identify the housing needs of specific groups as identified by the SHMA. The following sentence should be added to the end of Para 9.15: '1,171 of these dwellings should be provided to meet the housing needs of older people (8% of the total housing requirement)'.</p> | <p>Comments noted. Comments regarding the type of housing provided are addressed in relation to policy H5.</p> <p><b>Recommended response:</b> No change.</p>   |
| ANON-KSAR-NKYT-Q           | <p>All dwellings should be built, or existing buildings re-purposed, to the highest 'eco-friendly' standards. Adequate open 'green' space areas should be provided within easy walking distance of new or re-purposed development. The 15 minute radius for walking to services and shops should be applied.</p> <p>There has not been a 'holistic' approach to development, without adequate provision for infrastructure and services, or for 'community' spaces within easy reach, leading to</p>  | <p>Comments noted. Other policies of the Local Plan deal with matters such as sustainable construction standards, open space and infrastructure. It is important to read the LP as a whole. Comments regarding these policies are addressed in relation to other sections of the Plan.</p> <p><b>Recommended response:</b> No change.</p> |



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|                  | <p>social isolation and over dependence on car travel. In most of the larger developments dwellings have been built before the supporting infrastructure had been provided or enhanced.</p> <p>'Mixed use' developments should be encouraged. All factors which can mitigate the effects of climate change should be provided, including bio-diversity, green corridors, re-wilding, etc. This together with a 'circular economy', which would also help to 'grow a green economy' everywhere in the area.</p> |  |
| ANON-KSAR-N88F-N | <p>The policy does not explicitly require housing to be supported by schools, medical facilities, adequate sewage and rainfall removal, adequate drinking water provision, adequate transport, and adequate electronic communications. Any application for more than a single dwelling should cover these elements and must be compulsory in any development.</p>  | <p>Comments noted. Other policies of the Local Plan deal with matters such as the provision of infrastructure and facilities (e.g. Policies SP2 and T1). It is important to read the LP as a whole. Comments regarding these policies are addressed in relation to other sections of the Plan.</p> <p><b>Recommended response:</b> No change.</p>                    |
| ANON-KSAR-N8XT-3 | <p>The main objective is the number of houses which does not help in solving the housing crisis as the wrong type of houses will be built in the wrong areas. No thought is being given to new ways of developing houses, development is handed over to main contractor who builds Barton Farm. South Wonston is being targeted with no consideration of the effect on local services or increased traffic due to the remote location, conflicting with Green and Environmental objectives.</p>                | <p>Comments noted. Other policies of the Local Plan deal with matters such as the type of housing required (H5) and provision of infrastructure and transport (SP2 and T1). It is important to read the LP as a whole. Comments regarding these policies are addressed in relation to other sections of the Plan.</p> <p><b>Recommended response:</b> No change.</p> |

|                   | <b>Recommendations</b>  | <b>Officer response</b>   |
|-------------------|---|---|
| Comments from SA  | <p>No recommendations are included in relation Policy H1. The level of housing provision for the District is set out to have regard for the Government's Standard Method calculation and it is therefore not considered appropriate to include recommendations in relation to this policy area.</p> <p>The spatial strategy for the District is implemented through the allocation of sites included in the plan. The appraisal of site options has informed the selection of sites for allocation. Furthermore, throughout the IIA, recommendations are included relating to the topic based policies against which proposals for the development of allocated sites will be decided upon.</p> | <p>Comments noted.<br/> <b>Recommended response:</b> No change.</p> |
| Comments from HRA | None  | NA  |

### Amendments to Strategic Policy H1

Housing will be permitted to provide for the scale, types and tenures of housing needed in ~~the district over~~ the Local Plan **area over the Plan** period (~~2019-2039~~ **2020-2040**), including a contribution towards the unmet needs of adjoining areas. Provision is made for the development of about ~~15,115~~ **15,620** dwellings (net) in this period ~~within the District~~ (**excluding the South Downs National Park area**), by prioritising suitable previously-developed land within defined settlement boundaries, completion of strategic allocations at Kings Barton (North Winchester), ~~Berewood~~ **Newlands** (West of Waterlooville, ~~including Newlands~~) and North Whiteley, and delivery of sites allocated within and adjoining the most sustainable settlements, in accordance with the Local Plan's spatial strategy (set out in Policy SP2). Housing development will be distributed between the three spatial areas as follows:

- i. Winchester Town **about 5,640**~~5,670~~ dwellings
- ii. South Hampshire Urban Areas **about 5,650**~~5,700~~ dwellings
- iii. Market Towns and Rural Area **about 3,825**~~4,250~~ dwellings (~~of which 500 to be delivered in the South Downs National Park Local Plan area~~).

Amendments to supporting text

9.14 The Government has made it very clear that it wants to boost the supply and delivery of new homes and it expects the ‘Standard Method’ to be used as the starting point to set the housing requirement for the district. In addition, the ‘Duty to Cooperate’ requires that account is taken of any needs that cannot be met by neighbouring areas in establishing the housing requirement. These requirements should be the basis for the Local Plan unless **this threatens the protection of areas or assets of particular importance, or the adverse impacts would outweigh the benefits (see NPPF paragraph 11b)**. ~~there is clear evidence of a lack of suitable and available sites.~~ The Standard Method calculation changes annually, with the position at March ~~2024~~2023 being as follows:

Table H1 – Standard Method Annual Need

| Years of Plan Period                     | Standard Method Need | x Number of Years  |
|--|----------------------|--|
| 2019-2020                                | 666                  | 666 x 1 = 666  |
| 2020-2021                                | <del>666</del> 692   | <del>666</del> 692 x 1 = <del>666</del> 692              |
| 2021-2022                                | <del>666</del> 665   | <del>666</del> 665 x 1 = <del>666</del> 665              |
| <b>2022-2023</b>                         | <b>707</b>           | <b>707 x 1 = 707</b>                                     |
| <b>2023-2024</b>                         | <b>691</b>           | <b>691 x 1 = 691</b>                                     |
| <b>2024-2040</b><br><del>2022-2039</del> | <del>676</del> 715   | <b>676 x 16 = 10,816</b><br><del>715 x 17 = 12,155</del> |
| <b>Total</b>                             |                      | <b>13,565</b> <del>14,178</del>                          |

9.15 The Standard Method need is therefore currently **13,565**~~14,178~~ dwellings for the District over the Local Plan period to ~~2039~~**2040** (see Table H1 above). Within southern Hampshire there are a number of authorities that appear unable to meet their

Standard Method housing need in full that may ask the City Council to assist under the Duty to Cooperate and the Partnership for South Hampshire (PfSH) is working to establish the scale of any shortfall in provision and to **has developed** a Joint Strategy **Spatial Position Statement** to address this. but this has not been completed in time to inform this draft Local Plan.

**9.16** The PfSH authorities are taking a two-stage approach to addressing the needs of those authorities that may demonstrate that they are unable to meet their housing needs in full. In the short to medium term several authorities, including Winchester, should be able to exceed their Standard Method-based housing needs. Therefore an unmet needs allowance 'buffer' of about 1,450 dwellings is provided to cater for potential future increases in the Standard Method and, in the spirit of cooperation required by government policy, to help contribute towards the PfSH shortfall.

**9.17** In the longer term, the Spatial Position Statement identifies several 'Broad Areas of Search for Growth', where future local plans will assess the contribution they can make to ongoing unmet housing need in the sub-region. These seek to focus development on locations with a relative lack of significant constraints and which are most accessible by public transport, walking and cycling, or have the potential to be made accessible. Seven areas of search are identified, including 'East of Botley' within the Winchester Local Plan area. These areas are not allocated for development by either the PfSH Spatial Position Statement or this Local Plan. Significant further work will be required to develop detailed site allocation proposals and masterplans. This work will take several years to complete and will be progressed through either a review of this Local Plan or a dedicated Development Plan Document.

~~9.189.16~~ When assessing how much of the housing growth the council has to plan for needs to be provided on new site allocations in this Plan, the amount of housing already in the pipeline is taken into consideration. There are a large number of sites which already have consent for residential development, some of which have been completed since the start of the Local Plan period (2019-2020), or which are allocated by the existing Local Plan but have not yet been developed....

Table H2 – **Winchester District** Housing Need and Provision

| Winchester District Housing Need   |               | Winchester District Housing Provision                             |              |
|--|---------------|---|--------------|
| Standard Method need for Plan period <b>2020-2040</b> (see Table H1715 x 20 years) | <b>13,565</b> | Completions since start of Local Plan period ( <b>2020-2023</b> ) | <b>3,170</b> |
|  | 44,178        | 2019-2024)  | 4,547        |

|  |                                     |   |                                    |
|--|-------------------------------------|---|------------------------------------|
| <b>Unmet Needs Allowance</b> <del>'Buffer'</del> (for <del>Standard Method changes /</del> unmet need in neighbouring authorities) | <b>1,900</b><br><del>1,450</del>    | Outstanding planning permissions                    | <b>6,780</b><br><del>8,560</del>   |
|  |                                     | Other Commitments (previous Local Plans incl. SDNP) | <b>745</b><br><del>892</del>       |
|  |                                     | Windfall development                                | <b>1,895</b><br><del>1,975</del>   |
|  |                                     | Additional allocations made in this Local Plan      | <b>2,875</b><br><del>2,685</del>   |
| Total <b>District</b> _Housing Requirement   | <b>15,465*</b><br><del>15,628</del> | Total <b>District</b> _Housing Provision*           | <b>15,465</b><br><del>15,629</del> |

\* Includes **approximately 350**~~500~~ dwellings within the South Downs National Park part of Winchester District.

**9.209.18** Table H2 shows that sufficient housing provision is proposed to meet the Winchester District housing requirement, which includes **an estimated 350**~~500~~ dwellings within the South Downs National Park part of the district and **an unmet needs allowance** ~~'buffer'~~ of **1,900**~~1,450~~ dwellings ~~in case of changes to the Standard Method~~ or as a contribution towards the unmet needs of neighbouring areas in South Hampshire. **The remaining requirement for the Local Plan area (excluding the estimated 350 in the South Downs National Park part of the District) is 15,115 dwellings.** Some 64% of the **District** requirement is met by dwellings that have either been completed or which already have planning consent. A further 12% are expected from windfall development over the Plan period and this is based on cautious assumptions derived from the Assessment of Windfall Trends and Potential 2021. Therefore, less than 25% of provision is from Local Plan allocations (either carried forward or new), giving a high level of certainty over the delivery of this additional housing.

**9.229.20** Policy SP2 sets out the development strategy for the **Local Plan area**~~district~~ and Policy H1 sets out how this will be achieved in terms of housing provision. The total provision of about **15,115**~~15,620~~ dwellings relates to **the Local Plan area and it is estimated that a further** ~~Winchester District. The Council has agreed with the South Downs National Park Authority that about 350~~~~500~~ dwellings will be provided within the National Park part of the district, which will come forward through the existing South Downs Local Plan (which covers the period to 2033) or a subsequent review.