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Winchester District Local Plan

## **Winchester City Council Local Plan Examination**

### **Hearing Statement Matter 4: Meeting housing need**

April 2025



**Winchester**  
City Council

## **Matter 4 Meeting housing need**

**Issue: Would the overall strategy and provision for housing development be justified, effective and consistent with national policy?**

### **Contents**

Calculation of Local Housing Need (LHN).....	3
The housing requirement .....	6
The overall supply of housing.....	17
Five year housing land supply .....	25
Appendix A .....	33

# Calculation of Local Housing Need (LHN)

- 1. The Council has calculated LHN using the Government's standard methodology. That gives a figure of 13,565 dwellings over the Plan period 2020-2040. That figure includes an affordability adjustment to take account of past under delivery. In this regard does the Plan accord with NPPF paragraph 61, which indicates that strategic policies should be informed by a local housing needs assessment conducted using the standard method in national planning guidance (PPG)?**

WCC response:

- 1.1 Yes, the Council considers that Plan accords with NPPF paragraph 61. The Council has used the Standard Method as the starting point for determining local housing need at all substantive stages of the Local Plan's production. Table H1 of the Proposed Submission Local Plan (Regulation 19) (page 215) shows how the Standard Method figure has varied since the start of the Plan period and it was 676 dwellings per annum on submission of the Plan for examination in November 2024. The Planning Practice Guidance (PPG) states that *'local housing need calculated using the standard method may be relied upon for plan making for a period of 2 years from the time that the plan is submitted to the Planning Inspectorate for examination'* (PPG paragraph 008 Reference ID: 2a-008-20241212).
- 1.2 Table H2 of the Local Plan (page 216) confirms that the Standard Method housing need for Winchester District is 13,565 dwellings over the Plan period. The Housing Topic Paper July 2024 ([SD10g](#), Chapter 3) confirms that the Standard Method has been used and that the Council is not promoting an 'alternative approach'.
- 1.3 NPPF paragraph 61 also requires that *'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'*. The Council's approach to this and other potential reasons to increase the Standard Method figure (e.g. affordability) is summarised in response to questions on the housing requirement and questions 2 and 3 below.

- 2. Is there substantive evidence to demonstrate that it would be appropriate to plan for a higher housing need figure than the standard method indicates in this case as per advice set out in the PPG (Paragraph: 010 Reference ID: 2a-010- 20201216)?**

WCC response:

- 1.4 Yes, in relation to the unmet needs of neighbouring authorities. The Housing Topic Paper ([SD10g](#), Chapter 4) confirms that the Council has taken account of the unmet needs of neighbouring authorities, which are detailed in the various

Statements of Common Ground (SD08a – SD08l). The Topic Paper shows that any unmet needs for general housing provision arise within the Partnership for South Hampshire (PfSH) area. PfSH has agreed a Spatial Position Statement ([SD08h](#)) which quantifies the housing shortfall at the time of its publication and sets out a two-stage strategy for addressing unmet needs.

- 1.5 The Housing Topic Paper Update, January 2025 ([ED02](#), Chapter 4) sets out in detail how the Local Plan housing requirement has been developed alongside the PfSH Spatial Strategy. It shows how the scale of unmet need in PfSH has changed as the Standard Method changes, that it arises from several authorities and that it will be addressed by multiple authorities. Therefore, the unmet needs of neighbouring areas are a ‘moving feast’, rather than being a simple matter of one authority taking account of the unmet needs of one other authority. The Housing Topic Paper Update ([ED02](#)) sets out in detail how the Council has navigated this complicated and changing matter.
- 1.6 The Proposed Submission Local Plan (Regulation 19) proposed an ‘unmet needs allowance’ of 1,900 dwellings, which is a substantial contribution aimed specifically at addressing unmet needs within the PfSH area. The Housing Topic Paper Update, ([ED02](#), Chapter 4) explains how Portsmouth City Council and Havant Borough Council have sought to have this allowance specifically allocated to their unmet needs. An apportionment has been agreed and the Council put forward a Proposed Modification to confirm this ([SD14a](#), PM60). The updated Statements of Common Ground with Portsmouth ([SD08i](#)) and Havant ([SD08e](#)) confirm agreement of this approach and that there are no remaining areas of disagreement regarding this matter in relation to the Local Plan.
- 1.7 The Housing Topic Paper Update, January 2025 ([ED02](#)) also notes that, due to a previous error in establishing the Local Plan’s housing requirement, the Council will need to propose modifications to reduce the Local Plan policy H1 housing requirement slightly, from 15,115 dwellings in total to 15,040 dwellings ([ED02](#), Chapter 5). This reduction of 75 dwellings would mean that the Standard Method figure is still exceeded but there would be a small reduction in the ‘unmet needs allowance’ (from 1,900 to 1,825 dwellings). The Statements of Common Ground with Portsmouth and Havant Councils acknowledge that the specific number of homes to be assigned to unmet need could be subject to multiple changes through the examination and hence it is expressed as a percentage of the total unmet need allowance ([SD08e](#) and [SD08i](#)).
- 1.8 The other examples of where there may be a need to increase housing need which are listed in PPG paragraph 2a-010 are addressed in response to question 3 below.

### **3. Are there other relevant factors to be taken into account in calculating the LHN?**

WCC response:

- 1.9 No. 'Other relevant factors' are addressed in the Housing Topic Paper ([SD10g](#), Chapter 3). It is noted that the only 'other factors' referred to in the NPPF are unmet needs and '*growth ambitions linked to economic development or infrastructure investment*' (Dec 2023 NPPF, paras 61 and 67). The Topic Paper concludes that there are no other factors which would require the Standard Method figure to be increased, apart from help towards meeting the unmet needs of neighbouring areas. As a result of the 'unmet needs allowance', the Council is planning for a significantly higher housing need than its Standard Method figure.
- 1.10 The Council notes the PPG advice that '*where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, ... the approach can be considered sound as it will have exceeded the minimum starting point.*' (PPG paragraph 015 Reference ID: 2a-015-20190220). While it is not seeking to justify an 'alternative approach', the use of the Standard Method as the starting point for assessing local housing need should also be considered sound. In addition, the Plan includes a substantial 'unmet needs allowance' (1,900 dwellings) as a contribution towards the unmet needs of neighbouring PfSH authorities. Establishing the scale of unmet needs over time and across multiple authorities, and how much various authorities should contribute, is a complex and uncertain process but the Council has taken a positive approach based on the best information and evidence available at the time.
- 1.11 The Council is satisfied that its calculation of the local housing need accords with the NPPF (paragraphs 61 and 67, Dec 2023 NPPF) and the PPG, and that there are no other relevant factors to be taken into account in calculating the housing requirement.

# The housing requirement

- 1. The Plan makes provision for 15,465 dwellings over the Plan period (2020-2040). That includes approximately 350 dwellings within the South Downs National Park (SDNP) part of Winchester District. Would that approach accord with NPPF paragraph 61?**

WCC response:

- 1.12 Yes, as NPPF paragraph 61 relates to the Standard Method figure which is calculated at the District-wide level. The Council is committed to achieving the Standard Method figure (plus an unmet needs allowance) but is not the local planning authority for the whole District. Therefore, it can only set a housing requirement within the Local Plan area, not the part of the District within the South Downs National Park (40%). In order to show how the Standard Method figure for the District will be achieved it is necessary to estimate how much housing provision will be within the SDNP part of the District.
- 1.13 The Housing Topic Paper, July 2024 ([SD10g](#), Chapter 4) explains in detail the relationship between the Local Plan and the SDNP and how the estimate of 350 dwellings was derived. Local Plan policy H1 is only able to cover the Local Plan area, with a housing requirement of 15,115 dwellings, but the Plan's explanatory text illustrates how the full Standard Method (plus unmet needs allowance) will be achieved, in accordance with NPPF paragraph 61.

- 2. SDNP Authority suggest a figure of 250 dwellings would be delivered with the SDNP in the Plan period. What would be the consequence should the lower figure deliver rather than the 350 accounted for in the Plan?**

WCC response:

- 1.14 The SDNP Authority's representation notes the uncertainty over the scale of housing that it can deliver, given the early stage of the South Downs Local Plan review. [A Regulation 18 Local Plan review](#) was published for consultation from 20<sup>th</sup> January to 17<sup>th</sup> March 2025, but this asked what level of growth the National Park should be planning for rather than setting out the number of additional homes being planned. Further work will be required by the SDNP Authority to derive a figure, taking account of comments received on the Regulation 18 Plan and the updated NPPF. Therefore, uncertainty over the capacity of the SDNP part of the District will remain beyond the examination period.
- 1.15 The Housing Topic Paper, July 2024 ([SG10g](#)) explains that the estimate of 350 dwellings is a modest figure based on past rates of development in the SDNP part of the District. The SDNP Authority has not indicated how its estimate of 250 dwellings has been derived or is justified. Nevertheless, the Housing Topic Paper ([SG10g](#)) concludes that *'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.* So, if the SDNP Local Plan review included a figure below 350 dwellings within the Winchester part of the SNDP, the unmet need allowance would effectively be reduced by the difference, as those dwellings would be needed to meet a Winchester District need.

1.16 The Housing Topic Paper Update, January 2025 ([ED02](#), Chapter 4) confirms that this position is reflected in the South Downs NP SOCG, August 2024 ([SD08j](#)). This is an area of uncertainty rather than disagreement and the SDNP Authority representation supports the Winchester Local Plan's 'unmet needs allowance'.

**3. In addition, it includes an allowance of 1,900 dwellings to take account of any needs that cannot be met within neighbouring authorities. Given constraints in the District, including within the SDNP, is this figure, which exceeds LHN justified by the evidence?**

WCC response:

1.17 Yes. The NPPF requires that account is taken of any unmet housing needs in neighbouring areas and that this should be in addition to the 'local housing need' (NPPF paragraphs 11b and 6). It is, therefore, a requirement that account is taken of unmet needs in order for the Plan to be consistent with Government policy. The Housing Topic Paper ([SD10g](#), Chapter 4) shows how the Council has taken account of the unmet needs of neighbouring authorities, which arise within the Partnership for South Hampshire (PfSH) area. PfSH has agreed a Spatial Position Statement ([SD08h](#)) which quantifies the housing shortfall at the time of its publication and sets out a two-stage strategy for addressing unmet needs.

1.18 The Housing Topic Paper Update, January 2025 ([ED02](#), Chapter 4) sets out in detail how the Local Plan housing requirement has been developed alongside the PfSH Spatial Strategy. It shows how the scale of unmet need in PfSH has changed as the Standard Method changes, and that it arises from and will be addressed by several authorities. Therefore, quantifying the unmet needs of neighbouring areas has been difficult and the Housing Topic Paper Update sets out how the Council has dealt with this challenging matter ([ED02](#), Chapter 4).

1.19 Because of this, it has not been possible to determine a fixed figure for unmet housing needs that should be added to the Standard Method figure. Even the PfSH Spatial Position Statement does not apportion unmet needs to specific local authorities, but instead proposes a 2-stage approach: Stage 1 based on additional provision through local plans by those authorities able to exceed their Standard Method figure (including Winchester); and Stage 2 'Broad Areas of Search for Growth' (formerly 'Strategic Development Opportunity Areas'). The timeline of the Local Plan and the PfSH Spatial Position Statement is illustrated in the Housing Topic Paper Update ([ED02](#), Table 2, page 14), with the level of provision expected to be achieved through Stages 1 and 2 set out in [ED02](#),

Table 3, page 18. The Local Plan's unmet needs allowance reflects the City Council's contribution to the PfSH Spatial Position Statement's stage 1. The Plan also refers to the 'Broad Area of Search' to the east of Botley, which will be progressed through a future review of the Local Plan (see Local Plan paragraph 9.17).

1.20 Given the uncertainty about the scale of unmet needs and how they would be addressed, the Local Plan adopts a suitable development strategy which also allows for a substantial contribution towards unmet needs. The figure of 1,900 dwellings reflects the capacity that is available, in addition to the Standard Method figure, within such a development strategy.

**4. In accordance with the approach set out in the Partnership for South Hampshire (PfSH) position statement and ongoing cooperation with neighbouring authorities, Portsmouth City Council and Havant Borough Council have confirmed an unmet need. How has the unmet needs allowance in the Plan been calculated?**

WCC response:

1.21 This question overlaps with question 3 and is largely answered in the Council's response above. The scale of the unmet needs allowance reflects the capacity within the Local Plan's development strategy, over and above the Standard Method figure. The development strategy has resulted from extensive consultation, evidence work and testing through the IIA. To develop a different development strategy in order to meet a greater amount of unmet needs would not be justified given the uncertainty about the scale of unmet needs and how other authorities will help meet them and the adverse impacts outweighing the benefits.

1.22 NPPF paragraph 11b expects unmet housing needs to be established through statements of common ground (footnote 6). While the various PfSH Statements of Common Ground include estimates of the unmet need, these change each time they are updated and do not show how unmet needs should be apportioned to the various authorities. The PfSH Spatial Position Statement sets out a strategy for dealing with unmet needs, which is reflected in the Local Plan. Importantly, statements of common ground have been agreed with all the City Council's neighbouring authorities and these define the scale of unmet needs and how much should be provided by the Local Plan. Specific provision is made to help meet the unmet needs of Portsmouth City Council and Havant Borough Council. These matters are agreed and therefore satisfy the requirements of the NPPF.

**5. In stating an unmet need allowance as opposed to a figure intended to meet the need in each authority, would the Plan be effective? Would it accord with**



**NPPF paragraph 61? If an intended figure were included in the Plan, how should that be expressed (as a percentage or specific numbers)?**

WCC response:

1.23 The City Council does not support the inclusion of a figure for each authority with an unmet need, given the changing nature of such needs and the fact that they may arise within, and be met by, a number of PfSH authorities that are at different stages of local plan production. The Local Plan's 'unmet needs allowance' is intended to be a general uplift to housing provision in the South Hampshire housing market area which helps to address unmet needs within PfSH. This is consistent with NPPF paragraph 61 which requires unmet needs to *'be taken into account in establishing the amount of housing to be planned for'*. This expects the housing requirement to be increased but does not require a figure to be specified for each authority with an unmet need. Neither is there a requirement within the PPG for this to be specified.

1.24 Nevertheless, during the course of discussing unmet needs with Portsmouth City Council and Havant Borough Council it became clear that those authorities considered that the 'unmet needs allowance' should be specifically apportioned between them. The City Council responded positively and cooperatively and, as these are the only authorities to formally request assistance with unmet needs, agreed that the unmet needs allowance should be apportioned, but by percentage rather than specific numbers, as these may change through the examination process. The authorities recognised that the housing figures could change and that the inclusion of a percentage split would allow for this, whereas specific figures may become out of date.

1.25 This approach was agreed and is included in the respective Statements of Common Ground with Portsmouth City Council ([SD08i](#)) and Havant Borough Council ([SD08e](#)). In accordance with the SOCGs the City Council has promoted a Proposed Modification (PM60) to Table H2 of the Local Plan through the Schedule of Proposed Modifications, November 2024 ([SD14a](#)). This proposes a percentage split between the authorities, with an indicative number of dwellings based on the Proposed Submission Local Plan's (Regulation 19) housing provision. Portsmouth City Council also requested that specific sites be identified within the Local Plan as contributing towards its unmet needs. The City Council does not agree with such an approach, which could imply there is some restriction on the occupancy of the resulting dwellings, which in reality there is not. Also, there is no requirement in the PPG for a Local Planning Authority to be this specific.

**6. Is there any substantive evidence to demonstrate that there should be an adjustment to the minimum housing requirement to help deliver affordable housing with regard to the PPG (Paragraph: 024 Reference ID: 2a-024-20190220), and if so, would that be effective?**

WCC response:

- 1.26 The Winchester Strategic Housing Market Assessment Update (July 2024) ([HA01](#)) identifies a level of affordable housing need equal to 56% of the proposed housing provision in the Plan. This is higher than can be viably achieved as a proportion of market housing schemes in current market conditions. The Winchester Housing Topic Paper (July 2024) ([SD10g](#)) considers this matter in detail at Chapter 3. While PPG paragraph 2a-024 states that *'an increase in the total housing figures included in the plan may need to be considered'*, paragraph 2a-006 of the same guidance notes that the affordability adjustment in the Standard Method *'is set at a level to ensure that minimum annual housing need starts to address the affordability of homes'*. The NPPF (paragraph 63) suggests that the need for various types of housing, including affordable housing, should be established *'within this context'* (referring to the Standard Method), so does not require the Standard Method to be increased to achieve affordable housing provision.
- 1.27 For context, it is worth noting that the standard method itself provides a significant uplift of 57% (not capped in the standard methodology) in housing requirements over household projections in order to assist housing affordability. In addition, the Local Plan proposes an 'unmet needs allowance' of 1,900 dwellings and these will also be expected to meet affordable housing requirements of policy H6. Hence the total provision proposed for Winchester District of 15,465 dwellings, or an average of 773 dwellings per annum (Local Plan table H2), is already 80% higher than the 2014-based household projections for Winchester District which are used as the basis for the Standard Method (430 dwellings per annum).
- 1.28 Therefore, while Government advice allows authorities to increase the housing requirement to help address affordable housing needs, it does not require this. It will be noted that neither the Strategic Housing Market Assessment 2020 ([HA02](#)), nor the 2024 Update ([HA01](#)), recommended increasing the overall housing provision as a means of achieving more affordable housing, even though the consultants took account of NPPF and PPG advice. Increasing the housing requirement may be one way to increase affordable housing provision, but could only achieve up to 40% of units as affordable housing, which is not an efficient mechanism. As noted in the Housing Topic Paper, there are other means by which additional affordable housing will be provided which are able to achieve 100% affordable housing provision or close to it, as follows.
- 1.29 For example, provision of wholly or largely affordable housing schemes is expected on affordable housing exception sites and through development by community land trusts or other charitable / not-for-profit organisations (e.g. Winchester Community Land Trust, Winchester Housing Trust, and many Registered Providers). The Council also has a programme of Council house building, with a target of delivering 1000 dwellings by 2032. While this includes some provision through Local Plan policies H6 and H7, it is expected that an element will be over and above provision through the Local Plan.

1.30 The Local Plan housing trajectory at Appendix A of this Statement shows that housing completions up to 2033/34 are typically between 800 and 1000+ dwellings per annum, with average completions from 2020/21 to 2033/34 of 925 dwellings per annum. The Strategic Housing Market Assessment Update 2024 ([HA01](#)) indicates that the need for affordable / social rented housing is 368 dwellings per annum (from 2023, less before this), which is 40% of the 925 dwellings which will be completed on average annually up to 2033/34. Although not all sites will provide 40% affordable housing, and not all provision will be for affordable rent, when taken with other sources of affordable housing provision the Plan could meet the most pressing needs for affordable rented housing well beyond when it is expected to be replaced by a local plan review in 2028/29.

1.31 The Strategic Housing Market Assessment Update 2024 ([HA01](#)) goes on to consider the role of the private rented sector and is clear that this currently makes an important contribution to meeting the needs of those requiring financial support to meet their housing needs. There are a substantial number of households claiming benefit support for their housing in the private sector, which the SHMA estimates at 1,700 in August 2023 (SHMA paragraph 3.36 and Figure 9.1). The Council has also established a housing company to further support the development of private rented housing.

1.32 With regard to the need for affordable home ownership, this is less clear or pressing, ranging from no need up to 127 dwellings per annum in the Local Plan area (Strategic Housing Market Assessment Update. [HA01](#), Table 3.19, page 34). Even at the top of the range, 127 dwellings per annum would amount to only 14% of the average of 925 annual dwelling completions expected on average from 2020/21 to 2033/34. Policy H6 expects 35% of affordable housing provision from market housing sites to be for affordable home ownership, which would achieve sufficient dwellings annually for affordable home ownership up to around 2033/34.

1.33 While it is acknowledged that there are substantial needs for affordable housing in Winchester District, the numbers on the Council's housing waiting list have only increased slightly since the start of the Local Plan period (1,452 in 2020/21 to 1,544 in 2023/24). It is expected that, taking account of all likely sources of supply, the Local Plan can provide for affordable housing needs in full until it is replaced by a local plan review. These sources include provision in conjunction with market housing schemes, exception sites, Council house building / housing company, community land trusts, and the private rented sector (with benefit support). Therefore, the Plan responds positively to the demand for affordable housing and there is no substantive evidence that there should be an adjustment to the minimum housing requirement to help deliver affordable housing.

**7. Would the Plan be positively prepared in assessing and reflecting in its policies the size, type and tenure of housing needed for different groups in the community as per NPPF paragraph 62?**

WCC response:

1.34 The Council commissioned a Strategic Housing Market Assessment (SHMA) to consider the needs of different groups in the community, which specifically addressed those groups identified in NPPF paragraph 63. The needs were considered in the Winchester District Strategic Housing Market Assessment (February 2020) ([HA02](#)) and Winchester Strategic Housing Market Assessment Update (July 2024) ([HA01](#)). In the case of travellers, need was assessed in the Gypsy and Traveller Accommodation Assessment (GTAA) (October 2022) ([GT01](#)) and updated in the Gypsy and Traveller Topic Paper, July 2024 ([SD10d](#)). In the case of those wishing to commission or build their own homes, the information in the SHMA ([HA02](#)) was updated by the Self and Custom Build Position Statement ([ED10](#)). In the case of students, the information in the SHMA was updated by the Student Accommodation Topic Paper ([SD10i](#)).

1.35 The needs identified by these studies have been considered and have informed the policies in the Plan, and in particular policies H5 (Meeting Housing Needs), Policies H6 and H7 relating to Affordable Housing, Policy H9 (Purpose Built Student Accommodation), Policies H12 to H15 relating to Gypsies, Travellers and Travelling Showpeople, and allocations H16 and H18 and KW2. It is considered that the Plan does appropriately consider the housing needs of different groups in the community and sets out a positive response in meeting those identified needs.

**8. Taking account of completions since the start of the Plan period, extant planning permissions and other commitments, less than 25% would be delivered by new site allocations. In this regard, would the Plan be positively prepared? Would it be effective, justified and consistent with national policy which aims to significantly boost the supply of homes (NPPF paragraph 60)?**

WCC response:

1.36 Yes, the Council considers that the Plan is effective, justified, and consistent with national policy, specifically NPPF paragraph 60, as it significantly boosts the supply of homes by meeting the housing figure derived from the Standard Method while also accommodating a substantial 'unmet needs allowance' (see responses to other questions regarding the housing requirement above). The number of new allocations required should be derived from the need to deliver an appropriate housing requirement, rather than being based on a specific percentage. There is no NPPF / PPG guidance that refers to the proportion of new allocations, although the NPPF does expect plan policies to make '*as much use as possible of previously-developed or 'brownfield' land*' (NPPF paragraph 123).

1.37 It is considered reasonable, and normal practice, for account to be taken firstly of housing completions within the Plan period, followed by existing planning consents, then windfall potential and carried forward sites. After these sources are considered it may (or may not) be necessary to look at new allocations to

achieve the housing requirement. If there are few completions / commitments / windfall sites / etc a high proportion of new allocations may be needed, but equally it may be that limited new allocations are needed if other sources can adequately meet housing requirements. The process of starting a new Local Plan will commence after the adoption of this Local Plan (2020–2040) and completions, commitments, windfall sites, etc will be reviewed. The percentage of dwellings on new site allocations is irrelevant and simply a factor of the number of new allocations that may be needed compared to existing commitments.

**9. Would the Plan period accord with NPPF paragraph 22, which requires strategic policies should look ahead over a minimum 15 year period from adoption?**

WCC response:

1.38 The Local Plan covers the period to 2040. Subject to the successful outcome of the Local Plan examination and the Proposed Submission Plan (Regulation 19) being adopted in late 2025, the Local Plan would look ahead over a minimum 15-year period.

1.39 In line with the request from the Chief Planning Officer the City Council has agreed an updated Local Development Scheme ([ED16](#)) in February 2025 and will be commencing on a Local Plan review straight away. This is due to be adopted in 2028/29 and, given the need to review plans every 5 years, there will be several reviews of the Local Plan before the 2040 end date in any event. In view of the above, the City Council believes that it does comply with the requirements of paragraph 22 of the 2023 NPPF.

**10. Given the Plan's start date of 2020, recent levels of 'overprovision' compared to the Standard Method figures are taken into account. Is such provision already reflected in the Standard Method calculation in terms of affordability uplift going forward on the basis of a link between completions and house prices?**

WCC response:

1.40 No, there is not a direct link. The Housing Topic Paper Update, January 2025 ([ED02](#), Chapter 3) addresses this matter in detail, as it was raised by some respondents to the Proposed Submission Plan (Regulation 19). The Topic Paper Update's Figure 1: Dwelling Completions and Standard Method Figure clearly shows that the Standard Method figure is not directly influenced by dwelling completions. If this were the case, there would have been a clear decrease in the Standard Method figure in response to the large increase in recent completions (almost doubling from 606 in 2016/17 to 1,201 in 2021/22). However, the graph shows that there has been very little fluctuation in the SM

figure and that in fact it has grown from 659 in 2018/19 to 691 in 2023/24, despite completions rising to very high levels.

1.41 Therefore, it can be seen that there is no direct correlation between completion levels and the affordability multiplier and hence no 'double counting' of recent completions. Instead, the key factors influencing house prices, whether locally or nationally, are interest rates and economic performance. Figure 2.2 of the SHMA Update is included in the Housing Topic Paper Update ([ED02](#), Chapter 3) and demonstrates the very clear relationship between dwelling sales in Winchester District and mortgage rates (2018 to 2023).

**11. Neighbourhood Plans are in preparation for New Alresford and Hursley. Denmead has a Neighbourhood Plan which the Parish Council intends to review. Can the Council provide an update in this regard?**

WCC response:

1.42 The Council's [Neighbourhood Plans](#) web page provides basic information on each of the neighbourhood plans in the District. See also the Council's responses in relation to questions under Matter 8: Development Allocations in the Market Towns and Rural Area.

New Alresford

1.43 The City Council designated the New Alresford Neighbourhood Plan area in September 2021, covering the whole of New Alresford Parish. Work has progressed with the assistance of planning consultants, including initial community consultation, evidence gathering, site assessment, and policy drafting, see New Alresford Town Council [website](#). Public consultation on draft Neighbourhood Plan policies and potential site allocations was launched in November 2024. The Neighbourhood Plan Steering Group is currently considering the consultation responses and preparing a Draft Neighbourhood Plan for consultation in Summer/Autumn 2025. It is fully expected that this will meet the requirements of Local Plan policy NA3, for an additional 100 dwellings on new site allocations.

Denmead

1.44 Denmead Parish Council commenced a review of the Made Neighbourhood Plan in 2022. To date the Parish Council have undertaken site assessments and a housing needs assessment, and more recently, the Parish Council have undertaken a site selection assessment of the SHELAA sites that are adjacent to the settlement of Denmead. The site selection assessment is aimed at meeting the housing target set in Local Plan policy DEN1 and is available on the Parish Council's [website](#). The Council are in the process of drafting the Neighbourhood Plan review.

Hursley

1.45 The City Council designated the Hursley Neighbourhood Plan area in January 2021, covering the whole of Hursley Parish. Work has progressed with the assistance of various planning consultants and a [Site Assessment Report for Hursley Parish Council](#) was published and agreed by the Parish Council in January 2025. A call for sites exercise will be undertaken in March 2025, with draft proposals to follow.

1.46 More recently, two further neighbourhood plan areas have been designated at Curdridge (August 2024) and Wickham and Knowle (February 2025). Work on these neighbourhood plans is at a very early stage and subject to the outcome of the Local Plan examination, the Local Plan will be adopted before any substantial work has been undertaken on either of these Neighbourhood Plans. As such, these neighbourhood plans will be expected to support the delivery of the Local Plan's strategic policies and be in general conformity with them (NPPF paragraphs 13, 29 and 67)

**12. NPPF paragraph 67 expects strategic policies to set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Would the Plan accord with this expectation?**

WCC response:

1.47 Yes, strategic Policy H3 (Spatial Housing Distribution) sets out the proposed strategy for each spatial area that was informed by work that is outlined in Appendix 3 of the Development Strategy and Site Selection Topic Paper ([SD10c](#)). The Neighbourhood Plans that are being produced are within the Market Towns (New Alresford) – target of 100-120 dwellings (table on Local Plan pages 389-390), Larger Rural Settlements (Denmead) – target of 90-100 dwellings and Intermediate Rural Settlements (Hursley) – target of 50-60 dwellings. These ranges are reflected in the relevant Local Plan policies, with the exception of Hursley (policy NA3 'about 100 dwellings', policy DEN1 'about 100 dwellings').

1.48 In the case of Hursley, the Parish Council had requested designation of the neighbourhood plan area in November 2020 and the City Council agreed this by letter dated 15 January 2021. This was before the Strategic Issues and Priorities consultation document (February 2021, [CON05](#)), so the spatial development strategy for the new Local Plan had not been determined. Therefore, the Council's designation letter referred to the extant Local Plan at the time: *'under the current strategic policies there are no specific requirements for housing or other development in Hursley Parish'*.

1.49 The Local Plan development strategy and individual settlement housing targets were not published until November 2022, in the Regulation 18 Local Plan. It would not have been reasonable at that stage to introduce a new housing requirement for Hursley, especially as the extant Local Plan remained in place with no housing requirement. Hence the Proposed Submission Local

Plan (Regulation 19) only requires the provision of 'about 20 dwellings' in Hursley (policy HU1), either through site allocations or windfall. The Neighbourhood Plan is being progressed by the Parish Council and is likely to achieve this number (see also response to question 11 above).

1.50 Policies NA3, DEN1 and HU1 set out housing requirements for those neighbourhood plan areas designated at the time the pre-submission Plan was prepared, which reflect the overall strategy for the pattern and scale of development. Requests to designate neighbourhood plan areas have since been received from Curdridge Parish Council and Wickham and Knowle Parish Council, see [neighbourhood plan web page](#). The City Council, therefore, believes that Policy H3 as submitted is consistent with the expectation in paragraph 67 of the 2023 NPPF.

**13. The Council has produced a Housing Topic Paper Update (ED02). That updates housing supply in accordance with the most recent Annual Monitoring Report (AMR) (2024). It identifies corrections and updates to the housing supply and consequent changes to the housing requirement. In this regard are modifications to the submitted Plan required for the purposes of soundness?**

WCC response:

1.51 Yes, although the Council believes that the policy H1 requirement of 15,115 dwellings can still be met, it has highlighted in the Housing Topic Paper Update that an error was found in the contribution of existing commitments towards this figure. The Housing Topic Paper Update ([ED02](#), Chapter 5) explains this in full and promotes a modification to the Plan to reduce the Policy H1 housing requirement to 15,040 dwellings ([SD14a](#), PM173). This reflects the evidence of housing supply in the Housing Topic Paper Update ([ED02](#)) and its housing trajectory (Appendix A). There will be a knock-on effect on other parts of the Local Plan such as Table H2 and policy H3, but modifications are not proposed in all cases at this stage until the housing numbers are finalised following the examination.



## The overall supply of housing

- 1. Would the housing trajectory provide a sound basis for meeting the identified housing need and accord with NPPF paragraph 78, which requires a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites? Does it identify a supply of specific, deliverable sites for five years following the intended adoption and specific, developable sites or broad locations for growth for the subsequent years 6-10 and, where possible for years 11-15 of the remaining Plan period, in accordance with NPPF paragraph 69?**

WCC response:

- 1.52 Yes. The Housing Topic Paper Update, January 2025 includes a detailed housing trajectory showing the expected contribution of all sources of housing for each year of the Local Plan period ([ED02](#), Appendix A). Only total completions are shown for years 1 to 4, but for years 5–20 there is a detailed site by site breakdown of all estimated future completions by source. This has been updated slightly in relation to Local Plan allocations and an amended housing trajectory forms part of Appendix A to this Statement. The Topic Paper explains each category and comments on their compliance with the NPPF definition of ‘deliverable’ and Appendix A to this Statement also provides a summary of evidence on the compliance of each Local Plan site allocation with the definition. This satisfies the requirement in the 2023 NPPF (paragraph 75) to include a trajectory for the Plan period. The trajectory includes site by site projections, primarily for the purposes of the examination. It is proposed that a summarised version (headings of supply categories only) would be included as a proposed modification to the Local Plan following the examination, unless the Inspector recommends inclusion of the full spreadsheet.
- 1.53 It can be seen from the housing trajectory that the majority of completions expected in the 5 years following adoption of the Plan are on sites that already have permission. The NPPF definition of ‘deliverable’ (NPPF Annex 2) advises that *‘sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires’*. The following housing trajectory categories fall within this definition: B (Small sites with permission), C (Large sites with full permission), D (Existing Local Plan allocations with full permission), and G (Communal planning permissions). Appendix A to this Statement includes a tab (NPPF Deliverable para A) providing evidence for Local Plan site allocations with consent (category D). Evidence of the delivery of other categories is included within the Authorities Monitoring Report Appendices ([ED03b](#), Appendix 3.4).
- 1.54 The NPPF definition of ‘deliverable’ also advises that a site that *‘has outline planning permission for major development, has been allocated in a*

*development plan, ...should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years'* (NPPF Annex 2). The Housing Topic Paper Update ([ED02](#), Chapter 5) explains that there is 'clear evidence' to demonstrate that trajectory category E (Local Plan strategic allocations) falls within the above definition of deliverable and that category J (Windfall allowance) satisfies NPPF 2023 paragraph 72 in relation to windfall sites.

1.55 With regard to the remaining categories of H (Local Plan 2040 allocations without permission) and I (Other existing allocations without permission), these account for a relatively small number of completions within the first 5 years from adoption. Evidence regarding the deliverability of the Local Plan allocations is contained at Appendix A of this Statement (NPPF Deliverable para B) and has been reviewed to take account of current evidence and discussions with site promoters. As a result the updates to the Local Plan trajectory (see Appendix A) result in a few sites within categories H and I being moved to after the first 5-year period. Changes are shown in red text in the updated trajectory (Appendix A) and the relevant 5-year period is highlighted in light green.

1.56 Sites expected to be developed in years 6-10 are required to be 'developable' and sites within years 11-15 should be developable 'where possible' (NPPF Annex 2). Appendix A (NPPF Developable tab) shows evidence of developability for category H falling within years 6-10 or 11-15. These are clearly 'developable', as they are in a suitable location (hence their allocation in the Local Plan) and have a 'reasonable prospect' of being developed as expected by the housing trajectory. Category I (Other existing allocations) relates to two small sites allocated in the existing Denmead Neighbourhood Plan. It is expected that these will be reviewed and carried forward / replaced in the Neighbourhood Plan review, currently underway, but Appendix A adopts a cautious approach and moves one site out of the first 5-year period.

## **2. Is the housing trajectory realistic and deliverable? Are there any threats to delivery?**

WCC response:

1.57 Yes, it is concluded above that the housing trajectory is realistic and deliverable, subject to a number of specific changes (updated at Appendix A). A large proportion of the expected housing provision is already committed through planning consents and the windfall allowance is robustly evidenced and, if anything, likely to be under-estimated (see question 3 below). There is a potential threat to delivery of Local Plan allocations which do not yet have permission (trajectory category H), although only very modest numbers of completions are expected from these sites in the next 5 years, with many sites phased until after 2030. Delivery evidence relating to these sites is contained at Appendix A and shows that any risk is very slight.

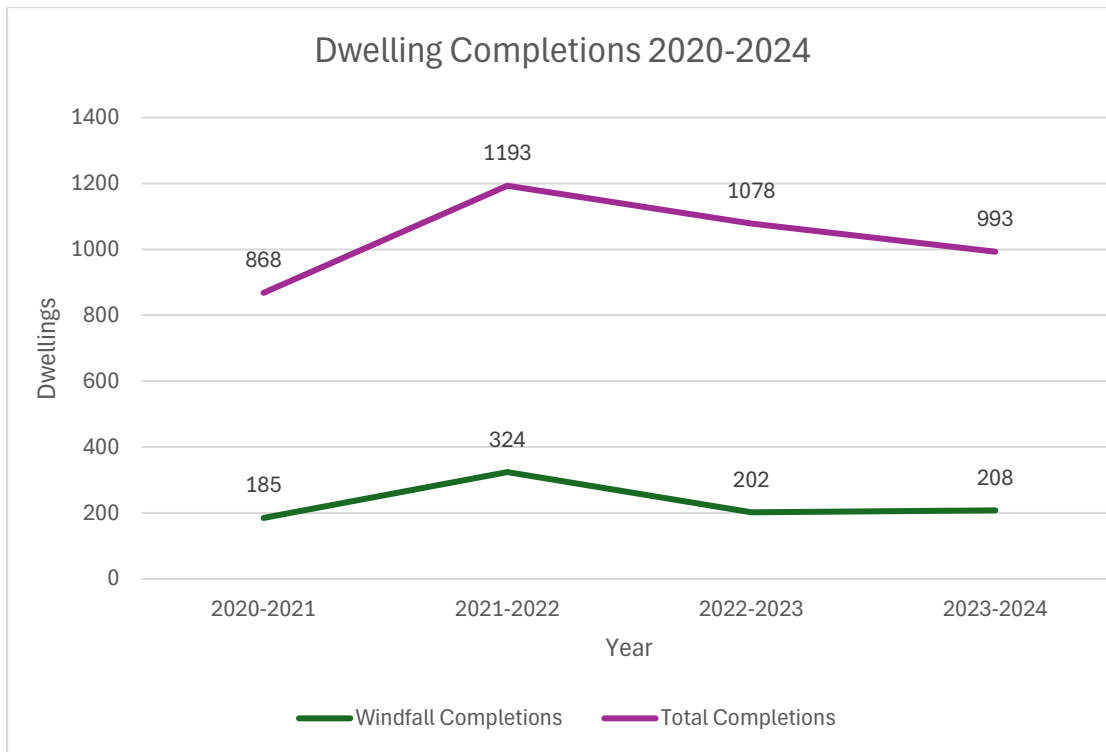
- 1.58 While the NPPF requires that only sites in the first 5 years from adoption of the Local Plan are 'deliverable' (with others being 'developable' or 'where possible') the Council has provided evidence at Appendix A that all the Local Plan allocations can be delivered within the (updated) timescales estimated. This has been achieved through extensive and ongoing viability testing of the Plan, contact with site owners / promoters, assessment of constraints and infrastructure requirements, and consultation on the Regulation 18 Local Plan. In fact, many of the new allocations are held back by policy H2 until after 2030 and the City Council is aware from the representations that the site promoters of these sites are generally seeking to remove this limitation, indicating their desire to bring these sites forward for development at the earliest opportunity.
- 1.59 The Inspector has asked the Council to produce a spreadsheet accompanied by evidence on delivery information, which forms part of Appendix A of this Statement. The examination process will test the deliverability / developability of the Local Plan's housing allocations and enable any significant threats to be identified and mitigated. While the Council is confident of the realism and deliverability of the updated trajectory, the examination process will identify whether any adjustments are needed. If so, these are not expected to threaten either overall housing delivery or the maintenance of a 5-year supply of housing land.

**3. Is the contribution towards housing supply from windfall justified? Is there compelling evidence that they provide a reliable source of supply in accordance with NPPF paragraph 72?**

WCC response:

- 1.60 The Windfall Assessment Report, February 2021 ([HA07](#)) provides detailed evidence to support the inclusion of the windfall allowance. It carried out an extensive assessment of development in the period 2012-2019, taking care to avoid double-counting with SHELAA or allocated sites, and assessed sites of different sizes and types. The main criticisms of the windfall allowance that were made by respondents to the Local Plan are addressed in the Housing Topic Paper ([SD10g](#), Chapter 5).
- 1.61 The Windfall Assessment Report, February 2021 ([HA07](#)) estimated that windfall sites would contribute an average of 115 dwellings per annum within the Local Plan area (excluding the South Downs National Park), which was itself much more cautious than the average of 206 dwellings per annum experienced over the period of the Windfall Assessment ([HA07](#), Chapter 6). This figure excluded SHELAA (Strategic Employment and Housing Land Availability Assessment) sites within settlement boundaries to ensure no 'identified' sites were included or double counted (155 dwellings in the 2019 SHELAA).
- 1.62 The Council has continued to monitor housing completions to assess whether they have arisen from allocated or windfall sites. The graph below illustrates the position since the start of the Local Plan period (2020-2024). This shows

that completions on windfall sites totalled 919 dwellings in this period, an average of 230 dwellings per annum. The figures for 2020-2024 include a small number of dwellings developed on SHELAA sites within settlement boundaries (14 dwellings), so excluding these would reduce the total windfall completions in this period to 905 and the annual average to 226.



1.63 Recent completions on windfall sites are, therefore, well above the 115 dwellings per annum assumed by the Local Plan and Windfall Assessment and even higher than the annual average for windfall completions recorded in the Windfall Assessment ([HA07](#)) of 206 per annum (2012-2019). This reinforces the Council’s view that the Local Plan’s windfall allowance is a very cautious and justifiable estimate.

1.64 The housing trajectory (see Appendix A) includes the windfall allowance of 115 dwellings from 2026/27 onwards. Its base date is April 2024, so no windfall allowance is made for the first 2 years from the base date to allow time for the granting and implementation of new consents from 2024 onwards. These will provide the 115 windfall dwellings a year included in the trajectory (existing planning permissions, including windfall, are already counted in the trajectory).

1.65 Therefore, the Windfall Assessment has carried out a detailed assessment of historic windfall rates and expected future trends on various types and sizes of site throughout the Local Plan area and arrived at a cautious estimate of future windfall provision. Ongoing assessment of development on windfall sites since the start of the Local Plan period (2020-2024) confirms that the windfall

allowance remains a modest estimate and is deliverable. These assessments together provide the 'compelling evidence' that is sought by NPPF paragraph 72.

**4. In broad terms, is the housing development proposed in the Plan and set out in the trajectory based on a sound understanding and robust evidence?**

WCC response:

- 1.66 Yes, the answers to the questions above, and the evidence studies referred to illustrate that the housing development proposed is based on a sound understanding and robust evidence. Without listing all of the evidence base, some of the key studies that provide evidence and understanding of the local housing market are the Strategic Housing Market Assessment 2020 ([HA02](#)) and the 2024 Update ([HA01](#)), the Strategic Housing and Employment Land Availability Assessment (SHELAA) which has been updated on a regular basis to 2023 ([HA04](#)), the Windfall Assessment Report ([HA07](#)), the Strategic Transport Assessment ([ST15](#)), and the Infrastructure Delivery Plan ([IN01](#)).
- 1.67 In addition, the Council has commissioned extensive assessments of housing viability, with a Local Plan Viability Report and appendices published in July 2024 ([LPV01](#), [LPV02](#), [LPV03](#)), along with various Further Information reports in August 2024 ([LPV04](#), [LPV05](#), [LPV06](#), [LPV07](#), [LPV08](#), [LPV09](#), [LPV10](#), [LPV11](#), [LPV12](#)). Between them the various viability assessments considered a large number of housing site typologies, development types and locations, including examples relevant to the various Local Plan allocations. These provide confidence that the Local Plan site allocations are viable with the various associated requirements for affordable housing, nutrient neutrality, sustainable construction, infrastructure, etc. A specific appraisal was carried out for the Local Plan's largest development allocation at Sir John Moore Barracks (Policy W2).
- 1.68 The Council has worked with the promoters and prospective developers of the Local Plan site allocations and has consulted on two versions of the Local Plan (at the Regulation 18 and 19 stages). This has helped flag up any concerns about delivery, viability, infrastructure provision, policy requirements, etc and enabled changes to address these where necessary. Therefore, extensive and robust evidence has been produced to aid the Council's understanding of the local housing market and ensure that the Local Plan's housing allocations are deliverable. It is notable that most promoters of allocated sites have responded to the Regulation 19 Local Plan confirming the deliverability of their sites, with none raising fundamental issues.

**5. Policy H2 holds back permissions for new greenfield site allocations until 2030 to prioritise previously developed land, achieve a more even housing**

**trajectory and level of development over the Plan period. What would be the expected impacts on housing land supply, 5 year housing land supply, delivery of a variety of sites and matters such as nutrient mitigation and thereby nutrient neutrality requirements and electricity grid capacity?**

WCC response:

1.69 Paragraph 6.8 of the Housing Topic Paper ([SD10g](#)) identifies the effects of the phasing policy which would prevent the new greenfield site allocations which are not for priority housing from coming forward until after 2030. This shows that, without the phasing policy, completions would peak in 2028/29 and would start to fall thereafter. This is shown in the graph in Appendix C: Effect of Phasing on Housing Trajectory on page 42 of the Housing Topic Paper update ([EDO2](#)).

1.70 The 2030 greenfield phasing policy will give time for the Local Plan to be reviewed so as to provide the higher housing numbers required by the 2024 NPPF / Standard Method. Without phasing it may only be possible to maintain an adequate 5-year + 20% land supply for a short period after adoption of the Local Plan, creating a situation where there could be a presumption in favour of permission (NPPF paragraph 11d) due to inadequate land supply, but no adopted replacement Plan. The result would be a risk of planning by appeal and development that is not properly planned or plan-led. The phasing policy also helps to deliver the City Council's prioritisation of brownfield sites, consistent with NPPF paragraph 123, whilst recognising that there are a number of site allocations, particularly Major Development Areas that have been rolled forward to the Proposed Submission Local Plan (Regulation 19) such as Kings Barton, West of Waterlooville and North Whiteley, that are located on greenfield sites.

1.71 As indicated in paragraph 6.14 of the Housing Topic Update ([EDO2](#)), as well as making a more even housing delivery over most of the Plan period, policy H2 also helps to address the delivery of infrastructure (e.g. electricity and water supply). All of the phasing assumptions in the Local Plan have been used to inform the collaborative discussions that have taken place between the City Council and various infrastructure providers and the information that has been included in the Infrastructure Delivery Plan ([IN01](#)).

1.72 The phasing assumptions that have been included in the Local Plan have also directly informed the analysis of the demand and supply of nutrient mitigation which has been included in the Nutrient Neutrality Topic Paper ([SD10h](#)). Without the phasing policy for greenfield sites, there would be an immediate impact on the short-term supply of nutrient mitigation, potentially having a significant impact on the five-year housing land supply – see Table 1 below.

Table 1 – Impact of Phasing on Nutrient Neutrality

Catchment	Current Demand	Demand if all sites delivered in the first 5 years of the Plan	Total Nutrient Mitigation Supply	Supply for Current Demand (with H2 phasing)	Supply if all sites delivered in the first 5 years of the Plan (no H2 phasing) <sup>1</sup>
East Hampshire – Nitrogen only	2,073.15 Kgs/TN/Yr	2354.65 Kgs/TN/Yr	5,908 Kgs/TN/Yr	Meets 100% Plan demand	Meets 100% Plan demand
Test and Itchen - Nitrogen	8,936.51 Kgs/TN/Yr	11,686.45 Kgs/TN/Yr	4,673Kgs/TN/Yr <i>(518.6 Kgs/TN/Yr from further 5 STW upgrades)</i>	Meets 58% Plan demand (roughly 8.7 years)	(44% of Plan demand) Roughly 2.2 years.
Test and Itchen - Phosphorus	393.62 Kgs/TP/Yr	484.86Kgs/TP/Yr	199.55Kgs/TP/Yr <i>(55.66 Kgs/TP/Yr from further 5 STW upgrades)</i>	Meets 64% Plan demand (roughly 9.6 years)	(52% of Plan demand) Roughly 2.6 years.

**6. In the absence of a stepped trajectory would the approach taken by the Council be effective, justified and consistent with national policy to significantly boost the supply of homes (NPPF paragraph 60)?**

WCC response:

1.73 Yes, the reference to boosting the supply of housing in NPPF paragraph 60 relates to the amount and variety of housing being sufficient to meet housing needs, both generally and of particular groups. The responses to other questions about the housing requirement show that this is achieved. Paragraph 60 of the NPPF also expects land with permission to be developed without delay

<sup>1</sup> It should be noted that the upgrades to the Technically Achievable Limits will not have taken effect in the first five years of the plan and therefore the amount of nutrient mitigation required would be significantly higher.

and as much of the area's housing need as possible to be met. The Local Plan does not phase 'land with permission' and meets the area's housing needs (as well as some unmet needs from neighbouring areas). A stepped trajectory is not required by NPPF paragraph 60, nor is it needed to achieve its requirements.

1.74 PPG paragraph: 012 Reference ID: 68-021-20190722 states that '*a stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period*'. Therefore, a stepped trajectory is typically used where sites are likely to be delivered later in the plan period, to avoid an excessive annual requirement in the early years of the plan. Thus the emphasis of the PPG is on ensuring that development is not unnecessarily delayed and identified needs are met.

1.75 In Winchester, the opposite situation applies. Rather than strategic sites being delivering later in the Plan period, the delivery of development is 'front-loaded' with high rates of delivery in the first half of the Plan period, reducing towards the end. In order to try to achieve a more even delivery of housing in this situation, as well as for nutrient neutrality and infrastructure reasons, the Plan includes policy H2 to hold back new greenfield housing site allocations until after 2030. The PPG envisages the possibility of a stepped trajectory in situations where '*development is likely to be delivered later in the plan period*', not where it will be delivered earlier. Even if the phasing policy (H2) were not found to be sound because of a need to increase development in the earlier parts of the Plan period, a stepped trajectory would not in itself help to bring forward sites.

1.76 A stepped trajectory is used primarily to reduce the housing requirement in the early years of a plan, to help planning authorities demonstrate a 5-year land supply in situations where development may be delayed until later in the plan period. In Winchester's case development will be at its highest levels in the early parts of the plan period and the 5-year land supply is consequently very healthy. A stepped trajectory would simply acknowledge the timing of development that is already proposed (and partly already committed), without improving delivery or 5-year land supply. There is, therefore, no need or point in applying a stepped trajectory for the reasons outlined above.

**Respondents are directed to the Council's Housing Topic Paper Update (ED02) and the most recent AMR. Those summarise the Council's evidence to date of completions since the beginning of the Plan period, existing commitments, site allocations, windfalls and any other sources of supply on which it relies.**

**The Council should produce a detailed spreadsheet setting out how many dwellings each committed and allocated site is expected to deliver in each year of the Plan period, and what any windfall allowance for each year is. (Guidance on what constitutes a realistic windfall allowance is at NPPF paragraph 71.) The**



**spreadsheet should be accompanied by evidence to justify the delivery information it contains, as appropriate.**

WCC response:

1.77 The housing trajectory provides a detailed spreadsheet setting out all sources of housing supply, year-by-year and site-by-site (large sites) over the Plan period. This was included in the Housing Topic Paper Update ([EDO2](#)) and is updated at Appendix A of this Statement. Changes to the trajectory are shown in red text at Appendix A and the 5-year period from adoption of the Local Plan is highlighted in light green.

1.78 The spreadsheet at Appendix A also include tabs providing evidence to justify the delivery information for all the Local Plan site allocations.

## Five year housing land supply

**In the Council's Housing Topic Paper Update (ED02) it states that the Plan is able to demonstrate a five year housing land supply on adoption of 6.7 years against an annual requirement of 679 dwellings home per annum (2025-2031).**

### **1. Will the Plan provide for a five year supply of specific deliverable housing sites on adoption with specific regard to the definition of deliverable in NPPF annex 2?**

WCC response:

1.79 Yes, the housing trajectory in the Housing Topic Paper Update ([ED02](#), Appendix A), updated at Appendix A below, sets out in detail all the sources of housing supply that are expected within the 5-year period. The Housing Topic Paper Update, January 2025 includes a detailed assessment of the sources of housing land supply, including how the various components satisfy the requirements of the NPPF ([ED02](#), Chapter 6), including the Annex 2 definition of 'deliverable'. Along with delivery information in Appendix A and the Council's answers to questions on the overall supply of housing above, this shows that the 5-year supply of housing consists of specific deliverable sites.

1.80 Table 5 of the Topic Paper Update ([ED02](#)) shows that 6.7 years supply is expected to be available on adoption of the Local Plan, using a base date of April 2025. The updated trajectory at Appendix A removes 98 dwellings from the housing supply available in years 1-5, which would reduce this marginally to 6.6 years supply – see Table 2 below (changes in red text). This does not include any buffers as the December 2023 NPPF only requires these if the Housing Delivery Test shows under-delivery, which is not the case in Winchester. Nevertheless, a 6.6 year land supply would equate to a buffer of 32%. Table 2 below also shows that the 5-year supply of 4,464 dwellings is

some 1,069 dwellings higher than the 5-year requirement (3,395). Therefore, even if there were uncertainty about the deliverability of some of the 5-year supply, there is ample scope for some sites to be moved to subsequent years while still maintaining an adequate supply.

Table 2 – Updated 5-Year Housing Land Supply on Adoption of Local Plan

<b>Housing Requirement</b>		
a	Local Plan housing requirement (modified)	15,040
b	Completions to Apr 2025 (Table 4 above plus trajectory completions 2024/25 [4,132 + 722 = 4,854])	4,854
c	Remaining Local Plan requirement (a – b)	10,186
d	Remaining years of Plan (2024-2040)	15 years
e	Annual requirement (c / d)	679
f	5-year requirement 2025-2030 (e x 5)	3,395
<b><u>Housing Supply</u></b>		
g	5-Year Supply (housing trajectory 2025-2030)	<b>4,464</b>
<b><u>Resulting Land Availability</u></b>		
h	Years of land supply (g / e)	<b>6.6 years</b>

1.81 While the Local Plan will be examined against the requirements of the December 2023 NPPF, for a five-year supply of specific deliverable housing sites from adoption, the Council has considered the situation that will apply after the Local Plan is adopted. On adoption of the Plan the 5-year requirement will be based on the Local Plan housing requirement, but paragraph 78c of the NPPF 2024 requires that a 5% buffer is added. Also, where the Local Plan housing requirement is less than 80% of the new local housing need figure, as is the case in Winchester, a 20% buffer is required (instead of 5%).

1.82 Table 6 of the Housing Topic Paper Update sets out an assessment of 5-year supply ‘for decision-making’ following adoption of the Local Plan ([ED02](#), Chapter 6). This assumes that the Local Plan requirement plus a 5% buffer will apply for a year from adoption, with a 20% buffer applying for the remaining 4 years. This demonstrates that over 5 years’ land supply can be maintained and that this continues to exceed the 5-year requirement by a substantial amount

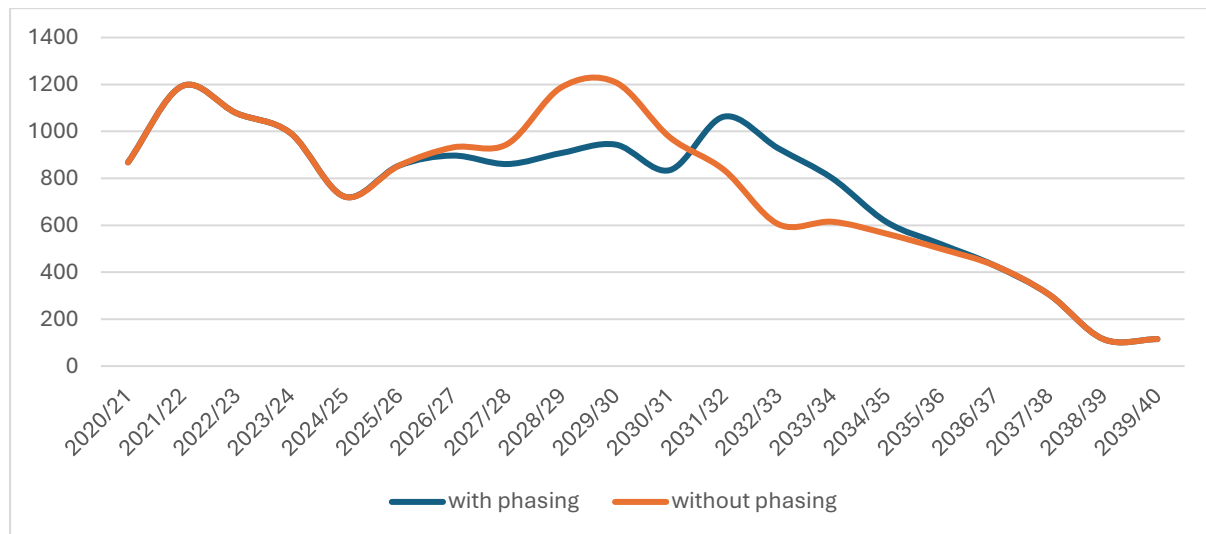
(almost 600 dwellings). Updating this to reflect the trajectory at Appendix A would reduce supply by 98 dwellings, but still maintain a supply of 5.6 years (compared to 5.7).

Table 3: Updated 5 Year Land Supply 2025-2030 (for decision-making)

<b>Housing Requirement</b>		
a	Local Plan housing requirement (modified)	15,040
b	Completions to Apr 2025 (Table 4 above + trajectory year 2024/25)	4,854
c	Remaining Local Plan requirement (a – b)	10,186
d	Remaining years of Plan (2025-2040)	15 years
e	Annual requirement (c / d)	679
f	5% buffer 2025-2026 (e + 5%)	713
g	20% buffer 2026-2030 (e + 20%)	815
h	5-year requirement 2025-2030 (f x 1 + g x 4)	3,973
i	Average annual requirement with buffer (h / 5)	795
<b>Housing Supply</b>		
j	5-Year Supply (housing trajectory 2025-2030)	<b>4,464</b>
<b>Resulting Land Availability</b>		
k	Years of land supply (j / i)	<b>5.6 years</b>

1.83 Appendix B of the Housing Topic Paper Update illustrates the ‘rolling’ 5-year land supply position and also shows that a 5-year supply plus 20% (equating to 6 years) is expected to be achieved until at least 2033/34. Updating this using the information in the trajectory at Appendix A would reduce supply slightly in the short-term but this would improve after 2030, so a 5-year +20% supply can still be maintained until 2033/34. The ‘rolling’ land supply tables (Appendix B of the Housing Topic Paper Update) are not updated given the marginal changes, but the graph showing housing provision with and without the phasing policy is updated below (updating Housing Topic Paper Update, Appendix C):

## Effect of Phasing on Housing Trajectory – Updated



1.84 The Local Plan will, therefore, not only provide a 5-year supply of housing land on adoption, but can continue to achieve an adequate land supply for decision-making purposes for some time after adoption. While only the position on adoption of the Local Plan needs to be examined, the Inspector can be satisfied that the Local Plan will also achieve an adequate ongoing land supply, so helping to provide for an orderly transition to a new Local Plan which will address the higher housing requirements of the new NPPF/Standard Method.

## **2. Which specific sites make up the extant permissions included within the housing trajectory and what is the evidence that they are deliverable as per the NPPF definition?**

WCC response:

1.85 The housing trajectory is set out at Appendix A (pages 36-39) of the Housing Topic Paper Update, Jan 2025 ([ED02](#)) and updated at Appendix A of this Statement. Sites with extant permissions fall into the following categories of the trajectory.

### Small site permissions

1.86 Section B of the trajectory sets out the total number of dwellings (305) on small sites with full permission as at 1 April 2024. For small sites, the NPPF advises that '*sites which do not involve major development and have planning permission... should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years*' (NPPF Annex 2). Individual sites are listed in Appendix 3.3 of the Authorities Monitoring Report 2023-2024 Appendices ([ED03b](#), pages 35-43) (which also includes small sites committed in the South Downs National Park), which is not repeated

here given that the NPPF definition of ‘deliverable’ includes all small site permissions. As the 5-year land availability situation is assessed on adoption of the Local Plan (for the period 2025 – 2030), the 5-year land supply calculation includes 244 dwellings shown in the trajectory (Appendix A) on small sites for the years 2025/26 to 2029/30. The Council is not aware of any clear evidence that these homes will not be delivered in this five year period.

### Large site permissions

1.87 Section C of the trajectory (Appendix A of this Statement) sets out the large sites with outstanding permissions as at 1 April 2024, totalling 336 dwellings on large sites excluding those that are allocated. Section D lists the existing Local Plan allocations with Full Planning Permission totalling 502 dwellings. The NPPF Annex advises that *‘all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years’*. All individual large sites with detailed consents are listed in Appendix 3.4 of the Authorities Monitoring Report 2023-2024 Appendices ([ED03b](#), pages 44-47), with a commentary on progress. This is not repeated here given that the NPPF definition of ‘deliverable’ includes all sites with detailed planning permission, but evidence on carried forward Local Plan allocations is included at Appendix A. Where there is clear evidence that the site will be delivered over a longer period than five years, this is reflected in the phasing. 630 dwellings from categories C (267 dwellings) and D (363 dwellings) are included within the 5-year supply as they are expected to be delivered within the first 5 years from adoption of the Plan (2025/26 – 2029/30). These sites all have full planning consent and the Council is not aware of any clear evidence that these dwellings will not be delivered.

### Strategic site allocations

1.88 Section E of the trajectory covers the existing Local Plan strategic allocations (Barton Farm, Winchester; Newlands, Waterlooville; and North Whiteley), which total 4,613 dwellings (Appendix A of this Statement). Each of these sites have outline planning consent, with various reserved matters approvals and development underway on each site (see Appendix A). The NPPF definition of ‘deliverable’ advises that a site that *‘has outline planning permission for major development, has been allocated in a development plan, ....should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years’* (NPPF Annex 2). The Housing Topic Paper Update ([ED02](#), Chapter 5) explains that there is ‘clear evidence’ to demonstrate that the Local Plan strategic allocations fall within the above definition, as supplemented by Appendix A and the Council’s statements on Matters 6 and 7. 2,580 dwellings from category E are expected to be delivered within the first 5 years from adoption of the Plan (2025/26 – 2029/30).

### Communal planning permissions

1.89 Section G of the trajectory sets out that 71 dwelling equivalents are expected from communal housing schemes with planning consent. These schemes are

listed in Appendix 3.5 of the Authorities Monitoring Report 2023-2024 Appendices ([ED03b](#), pages 52-53), with a commentary on each site, and all have full planning consent. The NPPF Annex advises that ‘*all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years*’. The Council believes these schemes will be delivered in accordance with the phasing set out in the AMR, with all 71 dwelling equivalents being completed within the first 5 years from adoption of the Plan (2025/26 – 2029/30).

1.90 Therefore, there is clear evidence that the following dwellings will be delivered from extant permissions within the first 5 years from adoption of the Plan (2025/26 – 2029/30):

Table 4: Completions on sites with planning permission 2025-2030

<b>Trajectory Category</b>	<b>Number of dwellings 2025-30</b>
B - Small Sites with Planning Permission	244
C - Large Sites with Full Planning Permission	267
D - Existing Local Plan Allocations with Full Planning Permission	363
E - Existing Local Plan Strategic Allocations	2,580
F - Large Sites with Outline Planning Permission	-
G - Communal Planning Permissions	71
<b>TOTAL</b>	<b>3,525</b>

**3. What is the compelling evidence that windfalls will provide a reliable source of supply, in terms of the Strategic Housing Land Availability Assessment (SHLAA), historic windfall delivery rates, and expected future trends, as set out in NPPF paragraph 72?**

WCC response:

1.91 See also the response to question 3 on ‘The overall supply of housing’ above. The Windfall Assessment Report, February 2021 ([HA07](#)) provides detailed evidence to support the inclusion of the windfall allowance. This estimated that windfall sites would contribute an average of 115 dwellings per annum within the Local Plan area (excluding the South Downs National Park), which was itself much more cautious than the average of 206 dwellings per annum experienced over the period of the Windfall Assessment ([HA07](#), Chapter 6).

1.92 The Council has continued to monitor housing completions to assess whether they have arisen from allocated or windfall sites. Completions on windfall sites totalled 905 dwellings (excluding SHLAA sites) since the start of the Local Plan period (2020-2024), an average of 226 dwellings per annum. Recent completions on windfall sites are, therefore, roughly double the 115 dwellings per annum assumed by the Local Plan and Windfall Assessment and even higher than the annual average for windfall completions recorded in the Windfall

Assessment ([HA07](#)) of 206 per annum (2012-2019). This reinforces the Council's view that the Local Plan's windfall allowance is a very cautious and justifiable estimate.

1.93 The housing trajectory in the Housing Topic Paper Update ([ED02](#), Appendix A) and Appendix A below includes a windfall allowance of 115 dwellings from 2026/27 onwards. Therefore, windfall sites (trajectory category J) are expected to deliver 460 dwellings within the first 5 years from adoption of the Plan (2025/26 – 2029/30). Ongoing assessment of development on windfall sites since the start of the Local Plan period (2020-2024) confirms that the windfall allowance remains a modest estimate and is deliverable. These assessments together provide the 'compelling evidence' that is sought by NPPF paragraph 72.

#### **4. The Council's calculation applies the 'Liverpool Method.' What is the reason for this and in so doing would this be sound and accord with NPPF paragraphs 69 and 77?**

WCC response:

1.94 The Housing Topic Paper Update, January 2025 includes 'rolling' 5-year land availability assessments using both the 'Sedgefield' and 'Liverpool' methods ([ED02](#), Appendix B). Paragraph 69 of the NPPF relates to the allocation of sites in the local plan, but paragraph 77 is relevant to 5-year land supply and refers to national planning guidance (PPG) providing further information. The PPG advises that the Sedgefield method should be used where there is a shortfall since the start of the plan period, by adding it to the 5-year requirement (Housing Supply & Delivery PPG, paragraph 022 Reference ID: 68-031-20190722). The subsequent paragraph confirms that over-supply against planned requirements can also be taken into account (paragraph 023 Reference ID: 68-032-20190722).

1.95 It can be seen from Appendix B to the Housing Topic Paper Update ([ED02](#)) that applying over-provision to the 5-year requirement (the Sedgefield method) gives a very high supply figure in the mid-Plan period, when over-provision builds up and is applied to the coming 5-year period. These peaks are less pronounced when the Liverpool method is applied as it spreads any over-provision across the whole remaining Plan period. While the PPG advises use of the Sedgefield method, the Council is concerned that this implies very high peaks in supply at times during the Plan period and considers the Liverpool method produces a more realistic result.

1.96 A similar situation applied when the existing Local Plan (Parts 1 and 2) was examined. In that case the trajectory showed a low level of development in the early years of the Plan period and the examination Inspector agreed that the Liverpool method would be more suitable in this situation. This conclusion was supported at subsequent planning appeals where housing land supply was a key issue. While the emerging Local Plan trajectory shows over-provision in

the early years, the principle remains that the Sedgefield method distorts the 5-year land supply picture by over-compensating for high or low levels of development in the early years of the plan period.

1.97 Whichever method is used, it is considered that the Council can demonstrate an adequate 5-year land supply over the Local Plan period, in accordance with the NPPF and PPG, in fact more so using Sedgefield than Liverpool. While the Council considers the Liverpool method to be preferable, it does not have a strong view on this.



# Appendix A

## Housing Trajectory and Delivery Spreadsheet

Appendix A incorporates the following:

**Housing Trajectory tab**, updating the trajectory included in the Housing Topic Paper Update, January 2025.

**NPPF Deliverable para A tab**, setting out delivery evidence for Local Plan site allocations with full planning permission which the trajectory expects to be delivered in years 1-5.

**NPPF Deliverable para B tab**, setting out delivery evidence for Local Plan allocations with outline permission, or a Local Plan allocation, which the trajectory expects to be delivered in years 1-5.

**NPPF Developable tab**, setting out delivery evidence for Local Plan site allocations which are expected to be delivered after years 1-5.