



**WINCHESTER CITY COUNCIL (WCC) LOCAL PLAN (LP)
EXAMINATION - STAGE 1 HEARINGS**

MATTER 4: MEETING HOUSING NEED

**Grass Roots Planning obo Barwood Land
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grassroots
PLANNING

Calculation of Local Housing Need (LHN)

Q1, Q2 & Q3

- 1.4 WCC's LP will be examined under the transitional arrangements and is therefore required to be in conformity with the 2023 National Planning Policy Framework (the Framework) and relevant Planning Practice Guidance (PPG). The Standard Method (SM) at this time, over a 20-year period, conforms with the 13,565 stated, however there is more than sufficient evidence to suggest a higher housing need figure should have been pursued.
- 1.5 Whilst we welcome the use of the SM as the basis for calculating the **minimum** requirement, the changes to the Framework/ SM (December 2024), published for consultation July-September 2024 (so well-known prior to submission) had significant implications for WCC and neighbouring authorities. It is our view that WCC fast tracked the LP to examination without fully considering the spatial consequences of meeting such a significant additional need. This will delay the delivery of sufficient homes leading to a significant backlog, adversely affecting the plan making process for years to come.
- 1.6 The LP is not in conformity with para 61 of the Framework as the SM is "an advisory starting-point" and there are exceptional circumstances to justify an alternative approach. The SM on which the LP was progressed was 676 dpa; under the new SM this has risen to 1,157, totalling 23,140 dwellings over the plan period - 8,025 above that identified in SP2 and Table H1 of the LP.
- 1.7 This is far too substantial an increase to ignore, and we strongly believe the Plan should be reconsidered to address a significantly higher housing target on this basis. Regardless of the outcome of the updated SM, there is also more than sufficient evidence to highlight that affordability issues felt so acutely across the district should have been addressed in the calculations (see para 216-219 in Barwood's Reg.19 reps), alongside a greater allowance to deal with the unmet need of neighbouring authorities.
- 1.8 WCC is unjustified in its approach to progress a housing target so significantly below the acknowledged need. This is not considered sound or justified by the evidence available.

The Housing Requirement

Q1 & Q2

- 1.1 WCC's Housing Topic Paper argues re: the figure assigned to South Downs National Park Authority (SDNPA), that any shortfall can be addressed via the 1,900 unmet needs allowance. However, this is already significantly below the unmet needs of neighbouring authorities (c.

12,000). Proposed modifications also confirm this figure is assigned to Portsmouth (30%) and Havant (70%) and SDNPA's unmet need cannot therefore be addressed through this allowance.

- 1.2 Evidence in SDNPA Duty to Cooperate (DtC) Statement of Common Ground (SoCG) clearly shows only 250 of the 350 would be delivered on land within SDNPA; and therefore 100 dwellings are unaccounted for and further allocations required to meet this need.

Q3

- 1.3 Supporting evidence including the Strategic Housing and Employment Land Availability Assessment (SHELAA) indicates there is suitable land available within Winchester to meet a higher LHN. The need across the adjoining authorities is significant (c. 12,000 prior to the SM update) and will nowhere near be met by the 1,900 dwellings proposed. Indeed, this figure appears to have just been rebadged from the previous non-delivery buffer. With no non-delivery 'buffer' WCC is entirely reliant upon 100% of its supply being delivered within the plan period, which evidence shows is entirely unrealistic. An additional buffer for non-delivery is required (alongside that to meet the unmet need of neighbouring LPA's), particularly considering the supply of sites including several sizeable allocations and following our Five-Year Housing Land Supply Position (5YHLS) review.

Q4

- 1.4 Portsmouth and Havant have highlighted an unmet need of 8,686 (before reviewing implications of the updated SM). WCC's LP is to address this by providing 1,900 dwellings split between the two authorities, however we see no evidence of where this figure has been calculated. This would go nowhere near meeting the acknowledged unmet need, and it is clear WCC has not considered or tested an approach to deliver a higher growth figure to meet more of this need as required under the DtC. The Plan is unsound in this regard.

Q6

- 1.5 Para 61 of the Framework alongside the PPG confirms that the SM comprises the **minimum** starting point and that there can be circumstances where the LHN should be higher including addressing affordability.
- 1.6 The Housing Topic Paper confirmed that the current need (2024) for affordable/social rented housing is 368 dpa, with affordable home ownership at 142 dpa equating to 75.4% of the total minimum LHN of 676 dpa, which is obviously substantial and undeliverable. Despite this WCC concluded that no adjustment should be made to its LHN to take account of

affordability. There is a clear and present need for affordable homes which is not being met. The level of need identified in the SHMA is significant and requires an adjustment to be made to the LHN to help meet at least some of the shortfall (see also para's 2.16 - 2.19 - Barwood's Reg. 19 Repts).

Q7

- 1.7 The LP does not proactively seek to address issues regarding specialist housing. There are just two allocations for older persons accommodation with a combined yield of 170 units. This compares to the SHMA 2024 that identifies a need for 998 homes for sheltered housing/retirement living, 620 homes providing extra care and around 800 care/ nursing home bedspaces by 2036. Indeed, there appears to be no approach to deal older persons accommodation to meet certain needs i.e. dementia. Para 6.15 of the SHMA highlights the number of older people with dementia is to increase by 74% between 2016 to 2036. There is no reference in the LP to how this need will be met.

Q8

- 1.8 With just 25% of the LHN delivered from new allocations, this adds to the increased risk associated with non-delivery. It cannot be expected that all permitted sites will come forward. Indeed, you would usually incorporate a buffer of 10%-20% to account for non-delivery. The Plan currently includes no buffer and therefore there are serious risks the Plan will not meet its LHN under the 2023 SM.
- 1.9 This is not a forward-looking plan and by not considering the potential to deliver higher growth, this cannot be aiming to significantly boost the supply of homes (the Plan is therefore inconsistent with para 60 of the Framework).

Q9

- 1.10 We do not believe the LP accords with para 22 of the Framework. Even if successful in progressing through examination to allow adoption in 2025, the Plan will only just cover the minimum 15 years from adoption. However, this is largely a moot point as WCC would be required to immediately review the LP following adoption to address the significantly increased housing need reflected in the updated SM.

Q10

- 1.11 WCC state in the Housing Topic Paper that the Plan Period start date is 2020 to allow some recent good housing completions performance to be accounted for. There is no basis to

support artificially bolstering supply by commencing the Plan period in 2020 purely to incorporate this oversupply. The SM utilises population projections alongside housing affordability data. Including several years of extant housing completions within the Plan period would result in the inclusion of completions that will have (through the mechanics of the SM) also fed into the assessment of LHN, which the balance of the plan period seeks to address.

Q13

- 1.12 The required amendments only seek to highlight our repeated concerns that the evidence base is simply not robust. These errors should have been picked up far earlier in the LP.

The overall supply of housing

Q1

- 1.13 The housing trajectory does not provide a sound basis for meeting WCC's identified LHN and does not appropriately identify a suitable supply of deliverable sites for the five years following adoption. See response to 5YHLS Q1.

Q2

- 1.14 We do not consider that the housing trajectory is realistic or deliverable. See response to 5YHLS Q1.

Q3

- 1.15 We do not consider the contribution towards the housing supply from windfall is justified (see also Barwoods Reg.19 representations - para's 2.33 – 2.44).
- 1.16 We also note double counting in this approach. The Windfall Topic Paper (HA07) concludes that a windfall allowance of 115 dpa should be applied. The trajectory in ED02 (page 39) applies this from 2026/27, with para 5.19 explaining that to avoid double counting "*no allowance is made for windfall sites for 2 years following the base date*". However, the trajectory in ED02 (page 36) shows 151 dwellings on known windfall sites are to be delivered in 2026/27, including 90 dwellings on known large windfall sites and 61 dwellings on known small windfall sites. The trajectory also shows 61 dwellings on known small windfall sites in 2027/28 and 2028/29 and 30 dwellings on known large windfall sites in 2029/30.

- 1.17 Even were the 115 dpa windfall allowance accepted (which we dispute), it should be amended to consider known windfall sites already included in the trajectory. The windfall allowance should therefore be applied as follows:
- 0 in 2026/27
 - 54 in 2027/28 and 2028/29
 - 85 in 2029/30
 - 115 in 2030/31 to the end of the plan period.
- 1.18 This reduces the windfall allowance by 267 and reduces the windfall allowance in the 5YHLS period by 267 dwellings.

Q4

- 1.19 Based on our response above and regarding the 5YHLS position, the trajectory is not considered to be based on robust evidence.

Q5

- 1.20 Progressing the current phasing approach will inevitably lead to issues in the short-term housing supply and housing not being located in the most appropriate locations. Policy H2 is considered unsound as it has not been positively prepared and could further restrict the LPA from meeting its LHN, particularly regarding affordable housing (see also Barwood's representations to the Reg.19 LP - para's 2.32 to 2.39).
- 1.21 The significant focus on Winchester town to meet the LHN and on brownfield above greenfield, is likely to lead to the delivery of less family homes and less affordable dwellings in the short term, as well as having potential implications on WCC's ability to maintain a rolling 5YHLS.

Q6

- 1.22 Please refer to above. We do not believe the current approach is justified or consistent with national policy as it has not been positively prepared and will not significantly boost the supply of homes in line with the evidenced need.

Five year housing land supply

Q1

- 1.23 As highlighted below we do not believe WCC will have a deliverable 5YHLS on adoption.

1.24 On the requirement side, we disagree that the 5YHLS requirement should be reduced by the “over-supply” of housing since the LP base date for the following reasons:

- Firstly, the proposed housing requirement is significantly below the LHN at 1,157 dpa. Under transitional arrangements, WCC proposes a housing requirement of 752 dpa, which is 65% of the LHN. This is below 80% given that this is the trigger for consequences in the December 2024 Framework e.g. the 20% buffer from 1st July 2026 and the transitional arrangements for plan-making requiring an early review. The Government’s response to the consultation on the Framework states that such a difference between an adopted requirement and LHN indicates “*a significant unmet demand for new homes in these areas*”. It also re-iterates the Government’s commitment to “*increasing housing numbers as soon as possible*”. Reducing the 5YHLS requirement by over-supply against a significantly lower figure than the LHN is not justified and will not assist WCC in building up a supply required to meet the significantly higher LHN as soon as the LP is reviewed, it therefore impedes flexibility.
- Secondly, the LHN of 1,157 dpa accounts for previous completions through step 2 (the affordability ratio, which is in part calculated by house sales, some of which will have been through new completions). Therefore, the 1,157 figure accounts for past completions and still results in a figure significantly above the adopted housing requirement. It is therefore counter intuitive to suggest the past over delivery against now out of date LHN targets should reduce the 5YHLS requirement and further reduce WCC’s ability to meet the higher LHN in due course – which it cannot avoid doing at a point in the fairly immediate future.
- Thirdly, the HDT is measured against the lower of either the adopted housing requirement or the LHN. Therefore, the minimum number of dwellings the Government expects WCC to deliver even on adoption of the LP is 752 dpa, not 679 as set out in table 5 of ED02 (page 31) (i.e. minus over-supply).
- Fourthly, the adopted housing requirement is a minimum figure and to reduce it by over-supply would be contrary to the Government’s objective of significantly boosting supply.
- Finally, the update to the PPG referred to at the end of para 77 of the Dec 2023 Framework was never made. The Government then changed and has removed this reference in the current Framework.

1.25 For these reasons, the 5YHLS should be measured against a figure of 752 dpa plus the relevant buffer, currently 5% and will be 20% from 1st July 2026. On the supply side, Emery Planning have reviewed the supply and conclude the following adjustments should be made to sites in the trajectory (pages 36 and 39 of ED02). Ben Pyecroft – Director – Emery Planning may be called upon to cover this further as required.

	Site	Capacity	LPA 5YHLS	Emery 5YHLS	Comments	Deduction
C.	14 Chesil St.	13	13	0	PP expired 28/02/22. New permission for extension to theatre.	-13
E.	Brymore House	26	26	16	Prior approval (PA) for 26 dwellings expired. Revised PA for 16.	-10
E.	WT1 – Barton Farm	1,408	555	425	Average completions on site: 85 dpa 2017-24, should be applied.	-130
G.	SH1 – Newlands	1,129	600	445	Average completions on site: 89 dpa - 2013-24, should be applied.	-155
H.	Older Persons	147 beds	82	77	National ratio now 1:1.9 not 1:1.8.	-5
H.	W2 Sir John Moore Barracks	900	90	0	Category b) site. No pp. No application. No clear evidence of deliverability.	-90
H.	W7 Central Winchester Regeneration Area	300	50	0	Category b) site. No pp. No application. No clear evidence of deliverability.	-50
H.	W8 Station Approach Area	250	35	0	Category b) site. No pp. No application. No clear evidence of deliverability.	-35

	Site	Capacity	LPA 5YHLS	Emery 5YHLS	Comments	Deduction
H.	W9 Bar End Depot	30	30	0	Category b) site. No pp. No application. No clear evidence of deliverability.	-30
H.	SH3 – Whiteley Green	30	30	0	Category b) site. No pp. No application. No clear evidence of deliverability.	-30
H.	BW3 Tollgate Sawmill	10	10	0	Category b) site. application. No clear evidence of deliverability.	-10
H.	CC1 – Clayfield Park	48	48	0	Category b) site. No pp. No application. No clear evidence of deliverability.	-48
H.	KW1 – Cornerways & Merrydale	45	45	0	Category b) site. No pp. No application. No clear evidence of deliverability.	-45
H.	SW1 Land at The Lakes, Swanmore (remaining)	17	17	0	Category b) site. No pp. No application. No clear evidence of deliverability.	-17
I.	KN1 Ravenswood	200	180	0	Category b) site. No pp. Outline application for 200 dwellings pending since 06/2018 (18/01612/OUT). No clear evidence of deliverability	-180

	Site	Capacity	LPA 5YHLS	Emery 5YHLS	Comments	Deduction
I.	Denmead NP Pol 2(ii) – Tanners Lane	18	18	0	Category b) site. No pp. WCC refused to grant permission for 11 dwellings 12/02/24. No further applications. No clear evidence of deliverability.	-18
J.	Denmead NP Pol 2(iv) – Anmore Road	10	10	0	Category b) site. No pp. No application. No clear evidence of deliverability.	-10
	Windfall allowance		460	193	Known double counting with windfall sites.	-267
	Total					-1,143

- 1.26 As can be seen WCC include 12 sites which fall within category b) of the definition of “deliverable”. These sites are only deliverable “*where there is clear evidence that housing completions will begin on site within five years*”. Para 5.16 (page 28) of ED02 indicates these are sites which are subject to planning applications or consent or where landowners / developers are bringing forward developments. This is not clear evidence of deliverability, and these sites should be removed.
- 1.27 Should WCC produce the evidence to support its inclusion of these category b) sites then we respectfully request the opportunity to make comments on this at the examination.
- 1.28 We conclude the deliverable supply at 1st April 2025 is 3,419 dwellings (i.e. 4,562 – 1,143 = 3,419).
- 1.29 As set out in para 78 of the Dec 2024 Framework, the 20% buffer will apply from 1st July 2026. Before then the 5% buffer will apply. There is no support in the NPPG for WCC’s approach of 1 year with a 5% buffer and 4 years with a 20% buffer (Table 6 of ED02, page 33).

1.30 The table below demonstrates that WCC will not be able to demonstrate a 5YHLS upon adoption of the LP even if the 5YHLS requirement is reduced by the over-supply.

		WCC		Barwood	
		5YHLS requirement reduced by oversupply	5YHLS requirement not reduced by oversupply	5YHLS requirement reduced by oversupply	5YHLS requirement not reduced by oversupply
A	Annual requirement	752	752	752	752
B	Annual requirement reduced by oversupply	679	752	679	752
C	5YHLS requirement without buffer (B X 5)	3,395	3,760	3,395	3,760
D	5YHLS requirement plus 5% buffer	3,565	3,948	3,565	3,948
E	Annual 5YHLS requirement and 5% buffer	713	790	713	790
F	5YHLS requirement plus 20% buffer	4,074	4,512	4,074	4,512
G	Annual 5YHLS requirement and 20% buffer	815	902	815	902
H	Supply at 1 st April 2025	4,562	4,562	3,419	3,419
I	Supply in years against 5YHLS requirement plus 5% buffer (H / E)	6.4	5.8	4.8	4.3
J	Supply in years against 5YHLS requirement plus 20% buffer (H / G)	5.6	5.06	4.2	3.8



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