

# Winchester District Local Plan

## Local Plan Examination April 2025

**Prepared on behalf of:** Blenheim Strategic Partners LLP

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<b>Representor personal reference number:</b>	<b>BHLF-AQTS-3267-B</b>
<b>Matter</b>	<b>Matter 4 – Meeting housing need</b>
<b>Relevant questions</b>	<b>Calculation of LHN: 1-3 Housing requirement: 1-13 Overall supply of housing: 1-6 5YHLS: 1-4</b>

**Ref.** RM/KW/EiP/02

## **Matter 4 – Meeting housing need**

### **1. Calculation of Local Housing Need (LHN)**

#### **Question 2 – Housing need figure**

- 1.1 The unmet needs allowance is 1,900, including 1,330 to meet the needs of Havant Borough Council (HBC) in light of their shortfall (10,650 units).
- 1.2 The Winchester Strategic HMA Update (HA01, July 2024) estimates a significant net need for affordable housing (AH) that would unlikely be met based on the current strategy. Even an average provision of 40% AH would require a housing land supply of 23,715 dwellings, therefore justifying a higher housing need figure than the 2023 SM.

#### **Question 3 – Calculating LHN**

- 1.3 WCC, Fareham Borough Council (FBC) and Portsmouth City Council (PCC) are progressing on the basis of the 2023 NPPF, whilst the remaining PfSH LPAs base their LHN on the 2024 NPPF. The PfSH needs, based on the new SM, increase by ca 1,750 dwellings per annum (excluding FBC and PCC).
- 1.4 East Hampshire District Council's position on contributions is unclear following its withdrawal from the PfSH (11 December 2024).

### **2. The housing requirement**

#### **Question 2 – SDNP**

- 2.1 The SDNP HEDNA September 2023 provides the evidence base for the 350 dwellings per annum figure. Whilst the SoCG (ref SD08j) indicates that “*approximately 250 dwellings*”, this relates to the potential supply rather than the housing need which is not justified.
- 2.2 The Focused SHMA (ref. HA01) Table 3.11 and Table 3.19 sets out the estimated need for 43 affordable rented and 20 affordable ownership units per annum for the area covered by SDNP (period 2023 to 2040). This equates to a total need of 1,071 affordable units within the SDNP area over the 17-year period. Even at the higher average of 40% affordable housing provision, this would require the SDNP area to provide a housing land supply of 2,678 dwellings.
- 2.3 In light of the above, it is evident that any reduced figure would increase the risk of a significant shortfall in affordable housing provision.

#### **Question 3 – unmet needs**

- 2.4 It is unclear how the unmet needs allowance of 1,900 dwellings is justified and evidence on this should be provided, as the allowance was based on unmet needs with regards to the 2023 NPPF and the previous SM. The new SM based on the 2024 NPPF leads to increase in housing requirements in the PfSH area of over ca 1,750 dwellings per annum (excluding FBC and PCC) in addition to the uncertainty of East Hampshire District Council (EHDC)'s contributions due to its withdrawal from the PfSH.

- 2.5 Additional, suitable sites are available as also described in the Regulation 19 Representation (ref. BHLF-AQTS-3267-B) including Land east of Lovedon Lane, Kings Worthy which should be included to the draft local plan to increase the council's housing land supply.

#### **Question 4 – PfSH unmet needs**

- 2.6 The Housing Topic Paper (ref. ED02) confirms that the contribution of 1,900 dwellings is allocated to PCC and HBC, at 560 and 1,340 respectively.
- 2.7 The SoCG with HBC (ref. SD08e, pg 12) caveats its agreement of the contributions subject to additional requests regarding unmet needs being made to Winchester and should the housing target and/or unmet needs allowance change in the course of the examination.
- 2.8 It is evident that the housing needs of the PfSH have increased due to the new SM, notwithstanding WCC, FBC and PCC working on the basis of the 2023 NPPF.

#### **Question 5 – Unmet need allowance**

- 2.9 A fixed, specific number could be a sound approach which provides a level of certainty at that point in time. However, this would not account for any changing housing needs, which is of particular concern for the PfSH authorities, as the majority of these are amidst various stages of preparing respective new local plans, whereby the level of unmet needs is still uncertain. A pure percentage-based figure would provide flexibility, but equally could lead to uncertainty as to the precise resulting number.
- 2.10 A hybrid approach of a specific base number with the provision of an additionality via a percentage base caveated by a change in housing needs would provide the most robust approach, i.e. providing 1,900 dwellings (base rate), at 12% of PCC's and 31% of HBC's unmet needs, with yearly reviews of the figure to amend the resulting figure based on increases of unmet needs (i.e. due to increased housing requirements) based on the set percentage.
- 2.11 For example, HBC states an unmet housing need figure of 4,309 dwellings. WCCs' contribution of 1,340 equates to 31% of HBC's unmet needs. Based on the new SM, HBC's needs increase over a 20 year period to 17,840 compared to the previous 10,320, which would increase its unmet needs to 11,829 dwellings. Using the same percentage (31%), WCC's contribution would then amount to 3,667 dwellings.

#### **Question 6 – affordable housing**

- 2.12 Yes. As set out in relation to policy H6 (affordable housing) of the Regulation 19 Representation (ref. BHLF-AQTS-3267-B), the Focused SHMA Update (ref. HA01) estimates an annual net need for affordable home ownership at 147 units per annum (as per Table 3.19 SHMA Update) and 411 social/affordable rented housing units per annum (as per Table 3.11 SHMA Update), which equates to a total need of 9,468 units from 2023 to 2040.
- 2.13 WCC's approach to affordable housing (AH) requires 40% AH and 30% on PDL, subject to viability. As a reference point, an average provision of 40% AH based on a need of 9,486 units would require a housing land supply of 23,715 dwellings from 2023 to 2040.

- 2.14 This approach would be largely consistent with the use of the 2024 SM, which equates to a LHN of 23,161 dwellings.

#### **Question 7 – Housing needs**

- 2.15 Policy H6 should be amended to ensure that any updated evidence is considered when assessing proposals, as set out in the Regulation 19 Representation (ref. BHLF-AQTS-3267-B), as the tenure split (affordable home ownership / social or affordable rent) may vary based on location and/or updated evidence.

#### **Question 8 – Site allocations**

- 2.16 No. As set out in the previous responses to Questions 1 to 7 of section 2 of Matter 4, the council should include additional sites to meet the estimated affordable housing needs and PfSH unmet needs in consideration of increased housing requirements. However, the majority of sites included in the council's supply are either already completed, have planning consent or are expected from windfall sites, the latter of which does not provide any certainty on quantum of development.

#### **Question 9 – Plan period**

- 2.17 There is a realistic risk that the council will fail to look ahead over even a minimum 15 year period from adoption, as the council is targeting adoption of the local plan in December 2025. Should the adoption slip into 2026, the plan period from adoption would effectively be less than 15 years, which does not accord with the NPPF.
- 2.18 Notwithstanding the above, a number of large-scale allocations are considered to be of strategic nature which may be at risk of delivering as anticipated with potential delays due to the nature of the infrastructure requirements. Whilst it is understood that amending the plan period could impact the completed evidence base with risk of requisite updates, it is recommended to extend the plan period end date to at least 2041 to incorporate a buffer, given the risk that the adoption of the plan may slip to 2026.
- 2.19 It is acknowledged that the start date is set for 2020, but it is clear that the minimum 15 year plan period refers to the period from adoption of the plan (targeted for 2025), not the start date of the plan period (2020).

#### **Question 10 - Overprovision**

- 2.20 The Housing Topic Paper (ref. ED02) notes that the introduction of the SM and the 2018 NPPF reset the clock in terms of LHN. The plan period considers the over-provision since 2020, totalling 3,170 dwellings. The SM should reflect past over-provision with the affordability uplift. However, there is no available evidence to suggest that past over-provision has indeed had an impact on the area's affordability.
- 2.21 When comparing the 2020 affordability ratio (AR) at 13.02 with the 2023 AR figure of 13.46, it appears that the affordability has worsened despite past over-provision. Therefore, it is not evident that past over-provision is reflected in the SM and, furthermore, utilising the completions from 2020 to 2023 will inflate the housing provision by 3,170 units which will in turn reduce the amount of new development coming forward. There is a risk that the council's strategy may further exacerbate the council's AR. Evidence is expected to justify the inclusion of previous completions.

#### **Question 12 – Neighbourhood areas**

- 2.22 As set out in the Regulation 19 Representation (ref. BHLF-AQTS-3267-B - H3), evidence should be provided to demonstrate that allocations to that extent are deliverable in consideration of para 68 NPPF 2023. Without evidence of deliverable scale, these should be removed from the supply.

#### **Question 13 – Modifications**

- 2.23 As outlined in the response to Question 10, evidence should be provided to demonstrate that it is justifiable to include completions from 2020. Should this matter be justified, then the updates based on the most recent AMR should be reflected in the local plan.

### **3. The overall supply of housing**

#### **Question 1 – Housing trajectory**

- 3.1 The Housing Topic Paper Update (ref. ED02 Appendix A) provides a trajectory in accordance with the NPPF, setting out expected delivery rates over the full course of the plan period. Whilst the trajectory identifies sites in the short-, medium- and long-term period, there are concerns in relation to the deliverability of some sites, which is further detailed in the following Question 2.

#### **Question 2 – Housing trajectory**

- 3.2 The submitted Regulation 19 Representation (ref. BHLF-AQTS-3267-B Appendix C) provides a high-level assessment of supply and raises concerns in relation to a number of sites with adjustments to the figures of ca 1,000 units, raising potential threats to delivery, such as:
- Inconsistent scale of development when compared to scale of Reserved Matters applications
  - Lack of evidence to demonstrate specific scale (i.e. W2, John Moore Barracks)
  - Significant landownership constraints (i.e. W7 – Central Winchester Regeneration)
  - Slow progress on Neighbourhood Plans where a specified number of units is allocated in-principle
  - No evidence of site deliverability (i.e. CC1 Clayfield Park)
  - Impact of proposed scale on landscape character and setting (i.e. CC3 Land at Main Road)

#### **Question 3 – Windfall**

- 3.3 The contribution of 115 dwellings under the windfall allowance is based on the Windfall Assessment Report 2021 (ref. HA07) and outlined in the Housing Topic Paper (ref. ED02, pg 28-29). This clarifies that the windfall allowance starts from 2 years from the base date (April 2024) in April 2026, with a total of 1,610 dwellings. This is a reduction from 1,725 with an updated local plan housing provision of 15,041. This should be updated in the Local Plan along with any other considerations.

3.4 The justification for the 115 dwellings windfall allowance is:

- **Winchester Town**

- Average total of conversions (22 units), redevelopment of redundant/commercial/leisure uses (38 units) and residential redevelopment (17 units) for an average of 77 units
- Exclusion of undeveloped land (6 units) and residential garden land (4 units), which would have resulted in an average of 88 units
- Reduction of SHELAA sites within the settlement boundary of Winchester (116 dwellings) from the total (77 units x 15 years = 1,155), resulting in 1,035 dwellings or 69 dpa over 15 years
- Conclusion: Exclusion of residential garden land or undeveloped land is not justified, given consistent trends, and no justification based on draft plan policies. Reduction of SHELAA sites due to double counting is not justified, as the initial analysis should have already excluded SHELAA sites. Therefore, the windfall allowance should be 88 units dpa over 15 years (1,324 units)

- **MTRA1/2**

- Inclusion of redevelopment of commercial/leisure uses (19 units), residential development (16 units) and conversions (5 units) for a total of 40 units
- Exclusion of garden land due to it not being known whether the local plan introduces policies related to garden development
- Exclusion of undeveloped land due to sporadic nature
- Conclusion: Exclusion of residential garden land (9 units on average) and undeveloped land (22 units) is not justified with no justification based on draft plan policies. Reduction of SHELAA sites due to double counting is not justified, as the initial analysis should have already excluded SHELAA sites. Therefore, the windfall allowance should be 71 units dpa over 15 years (1,073 units)

- **MTRA3**

- Inclusion of redevelopment of commercial/leisure uses (4 units), residential development (0.85 units) and conversions (0.85 units) for a total of 6 units. However, 50% for res dev commercial/leisure and conversions, for a total of 3 units
- Exclusion of garden land (5.7 units) due to it not being known whether the local plan introduces policies related to garden development
- Conclusion: Exclusion of residential garden land (5.7 units on average) is not justified with no justification based on draft plan policies. 50% reduction for res dev commercial/leisure and conversions is not justified. Reduction of SHELAA sites due to double counting is not justified, as the initial analysis should have already excluded SHELAA sites. Therefore, the windfall allowance should be 11.4 units dpa over 15 years (171 units)

- **MTRA4**

- Inclusion of conversions (9.57 units)
- Exclusion of redevelopment of commercial/leisure uses (0.14 units), residential development (1.85 units), undeveloped (open space) (20 units) and garden land (0.57 units) for a total of 6 units. However, 50% for res dev commercial/leisure and conversions, for a total of 3 units
- Exclusion of garden land (5.7 units) due to it not being known whether the local plan introduces policies related to garden development
- Conclusion: Only the inclusion of conversions is not justified with no justification based on draft plan policies. Undeveloped land (open space) was the biggest contributor. Reduction of SHELAA sites due to double counting is not justified, as the initial analysis should have already excluded SHELAA sites. Therefore, the windfall allowance should be 32 units dpa over 15 years (480 units)

3.5 Based on the above high-level review, it is clear that the windfall allowance of 115 dwellings is not justified and should be 203 dwellings per annum.

#### **Question 4 – Proposed housing development**

3.6 No. As set out in response to Question 2 of this Section 3 of Matter 4, there are concerns about the deliverability of a number of sites, which indicates that there is insufficient evidence to demonstrate that all of the allocated sites are considered deliverable.

#### **Question 5- Phasing**

3.7 Policy H2 holds back a total of 795 dwellings within 12 allocations (ca 28% of allocations - 2,875 as per Table H2 Local Plan). One of the key reasonings to withholding sites relates to maintaining housing land supply, nutrient neutrality requirements and grid capacity.

3.8 Withholding allocations to come forward prior to 2030 would, as per the Housing Topic Paper Update (ref. ED02) start completions on site by 2031/32.

3.9 The phased sites range between 10 and 150 dwellings. Consideration should be afforded to developments that provide on-site nutrient neutrality mitigation measures, which could help balance development proposals that are unable to provide on-site mitigation measures.

3.10 Risks associated with a phased approach include:

- Risk of reliance on PDL sites whereby there are significant concerns on deliverability and/or delays (i.e. landownership constraints, land contamination, demolition works, viability, S106 HoTs) which could impact the council's 5YHLS in the short term
- Unnecessary delays to contributing to meet unmet needs from neighbouring authorities
- Ongoing management of greenfield sites at cost and degrading quality (i.e. lack of investment due to allocation for residential use)
- Economic impact on local enterprises due to unnecessary significant delays
- Increased risk of unnecessary appeals should these sites come forward prior to 2030

#### **Question 6 – stepped trajectory**

- 3.11 The absence of a stepped trajectory would be supported by para 60 NPPF to ensure that a variety of land can come forward where needed.

### **4. Five year housing land supply**

#### **Question 1 – Deliverable sites**

- 4.1 Further details are required to evidence deliverability, including demonstrating when housing completions are likely to commence. A high-level review was provided in the Regulation 19 Representation (ref. BHLF-AQTS-3267-B Appendix C), raising several concerns of site deliverability and/or scale of the proposed allocations.

#### **Question 2 – Extant permissions**

- 4.2 The Housing Topic Paper Update (ref. ED02) seeks to demonstrate that the extant permissions are deliverable as per the NPPF definition, which includes sites listed in Appendix A (Local Plan Housing Trajectory) subsections B, C, D and G including small sites with planning permission and large sites with detailed planning permission, and communal planning permissions (dwelling equivalents).
- 4.3 However, there is insufficient evidence provided to demonstrate that these are deliverable in accordance with Annex 2 NPPF, nor is there available evidence to demonstrate how many of the extant consents will be completed.
- 4.4 For example, the existing local plan allocation WK1 (East of Winchester Road) has an extant planning permission for 120 units (ref. 17/02615/FUL) approved in 2019 (prior to the plan period) and appears to have been completed. However, an additional 17 units are noted within 2024/25. Evidence should demonstrate that 'deliverable' sites:
- Have planning permission issued within the plan period (2020 to 2040)
  - Are delivering the extent of their permission
  - Have been completed prior to the plan period

#### **Question 4 – Liverpool method**

- 4.5 The PPG (rev. Paragraph: 022 Reference ID: 68-031-20190722) encourages the Sedgefield Method instead of the Liverpool Method. In conjunction with the phasing approach as per policy H2 (para 6.9 of the Housing Topic Paper (ref. ED02)) to avoid 5YHLS issues by 2026/27, the Council considers this to provide a consistent supply throughout the plan period.
- 4.6 This approach is not justifiable and not consistent with para 69 and 77 NPPF particularly para 69a) which requires specific deliverable sites for five years following adoption and to ensure a sufficient 5YHLS can be maintained. The Sedgefield Method would be robust particularly with the removal of policy H2 (see response to Q5 of Section 3 Matter 4).