



ALFRED HOMES

**Representation to the Winchester District Local Plan
Regulation 19 Draft**

Policy H2 and Housing Land Supply

October 2024



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1. Executive Summary

- 1.1. The Paper is drafted by Chris Rees DIP TP MRTPI and addresses the Council's most recent position in respect of its Housing Land Supply, which has a direct correlation to its approach to Strategic Policy H2 and the Phasing of Housing Sites.
- 1.2. Within this representation it is shown that the City Council has erred in its calculation of past housing delivery performance, falling foul of assessing performance in line with the Practice Guidance and comparing the housing numbers delivered (housing completions) against the quantum required (housing requirement). As set out, the LPA has for the period 2011-2018 failed to do this, and instead for the Period 2011-2016 deemed the number of homes completed to be its 'requirement', and from 2016-18, what it had projected to be completed, totalling 3,226 dwellings. As evidenced in this Paper, the true housing requirement during this period was 4,375 new homes.
- 1.3. The Paper utilises the Council's evidence base, from which the assessment has been compiled and compared to best practice, current advice and that emerging in the form of the revised National Planning Policy Framework.
- 1.4. Where there are inconsistencies in the Council's evidence base and the Regulation 19 Draft, this is made clear within the Paper, with the sources of the numbers used cited.



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2. Housing requirement and performance (2011-2023)

- 2.1 Winchester City Council has used a unique ‘hybrid’ approach of calculating its past performances, which runs counter to best practice and the methodology used by other Local Planning Authorities.
- 2.2 The LPA’s error centres on its approach to calculating its housing requirement in the period from April 2011 to March 2018; a 7 year period during which the Council did not use its specified housing requirement of 625 dwellings per annum, but instead, sought to use its Housing Trajectory formed as part of the Local Plan Part 1. As per Para 3.1.10-3.1.11 of the Appendix to the Winchester District Authorities Monitoring Report (December 2023), the Council has stated that its ‘housing requirement’ was of 3,226 dwellings, or the equivalent of 461 dpa, which was significantly lower than the actual requirement of 625 dpa.
- 2.3 As shown within Figure 1, the 3,266 dwelling ‘requirement’ was in fact the actual number of past completions achieved from 2011 to 2016, and projected completions from 2016-2018.

Figure 1: Extract from LPP1 Trajectory (shown in full in Appendix 1)

Local Plan Part 1 Housing Trajectory	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
Commitments and SHLAA sites (within settlement boundaries)						366	394	389
Strategic Allocations						166	506	605
Local Plan Part 2/Windfall						0	120	280
Total Projected Completions						532	1020	1274
Total Past Completions	317	204	470	262	421			
Cumulative Completions	317	521	991	1253	1674	2206	3226	4500
Annual Average	625	625	625	625	625	625	625	625



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- 2.4 In essence, the Local Planning Authority has created the position where its housing requirement, against which it is to be judged, is in fact the cumulative completions (actual and projected) from 2011-2018. The consequence of this approach is shown within Figure 2 of this Paper, with the Council's actual and projected completions in the period 2011-2018 shown in blue. Under the Council's approach, referred to as the Hybrid approach given the change in methodology post 2018, it was mathematically impossible for the Council to fall behind from 2011 to 2016 given its requirement was also its completion rate.
- 2.5 Where it did fall behind was in the years 2016-2018, when its housing completions fell well below what the housing trajectory had predicted and before the switch was made and the 'requirement' was based on housing need.
- 2.6 This is a unique approach, and one not supported by the Practice Guidance. The LPA will contend that it was in its gift to give weight to its housing trajectory to judge performance, however, this would only be valid if the lower requirement at the start of a Plan Period were offset by the higher years later on, and actual projections were used and not completion rates.
- 2.7 As set out within this Paper and shown graphically within Figure 3, this has not occurred, with the switch occurring in April 2018. At this point the Council abandons this methodology of using the LPP1 housing trajectory, and instead switches to using an annualised housing requirement to judge performance based on housing need assessment. As shown within Figure 3, this switch in 2018 reduced the Council's annual requirement from what it would have been under the Housing Trajectory, to that of the Standard Methodology and an annualised requirement, which it should have used from the outset of the Plan Period and indeed is referenced within the LPP1 housing trajectory (625 dpa – See Figure 1).
- 2.8 The use of its actual completion numbers in the first instance as 'requirement', and then switching between methodologies is both flawed and contrary to best practice, which requires consistency in the reporting of housing performance across a Plan Period, using the same methodology throughout.



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2.9 Figure 2 provides the comparison between the position as of March 2023 as advocated by the City Council (LPA Hybrid), that of using a consistent approach since 2011 of the annualised housing requirement and Standard Methodology, and finally, what the position would have been if the Council had continued to use its LPP1 Housing Trajectory as the benchmark of performance.

Figure 2: Comparison Table 2011-2023 (Replicated at Appendix 2)

Monitoring Year	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	TOTAL	Communal Accommodation
Annualised Housing Requirement	625	625	625	625	625	625	625	659	666	692	665	715	7772	
Completions	317	204	470	262	421	555	547	810	636	798	1141	1044	7205	599
Cumulative Position	-308	-729	-884	-1247	-1451	-1521	-1599	-1448	-1478	-1372	-896	-567	-567	32
LPA 'Hybrid' Housing Requirement	317	204	470	262	421	532	1020	659	666	692	665	715	6623	
Completions	317	204	470	262	421	555	547	810	636	798	1141	1044	7,205	599
Cumulative Position	0	0	0	0	0	23	-450	-299	-329	-223	253	582	582	1,181
LPP1 Housing Trajectory	317	204	470	262	421	532	1020	1274	1439	1324	1146	1081	9490	
Completions	317	204	470	262	421	555	547	810	636	798	1141	1044	7205	599
Cumulative Position	0	0	0	0	0	23	-450	-914	-1717	-2243	-2248	-2285	-2285	-1686

1

2

Data Source: LPP1 Housing Trajectory & Table 3.7 AMR Dec 2023

2.10 Before the Paper assess the outputs of Figure 2, for the benefit of the Inspector, the City Council contends an ‘over provision’ of housing from 2011 to 2023 of **1,187** dwellings within its AMR (Para 3.1.11), with the numerical difference to the **1,181** dwellings as shown in Figure 2 being inconsistencies in the reporting of annual completions in the Council’s AMR. See footnotes for details. For the purposes of this assessment, the figure of 1,181 will be used, but the difference is marginal and does not make a material difference.

2.11 Numerically, the position as of March 2023 when the Communal Accommodation completions of 599 units is added in shows a marginal oversupply of 32 dwellings when the annualised housing requirement is used as the benchmark from 2011 to 2023. By comparison,

¹ Note, Year 2020/21 Completion in Council’s AMR stated as 798 in Table 3.7 and 804 in Table 1

² Standard Methodology Requirement taken from Para 3.1.11 of AMR Dec 2023 (differs slightly from Reg 19 Table 1)

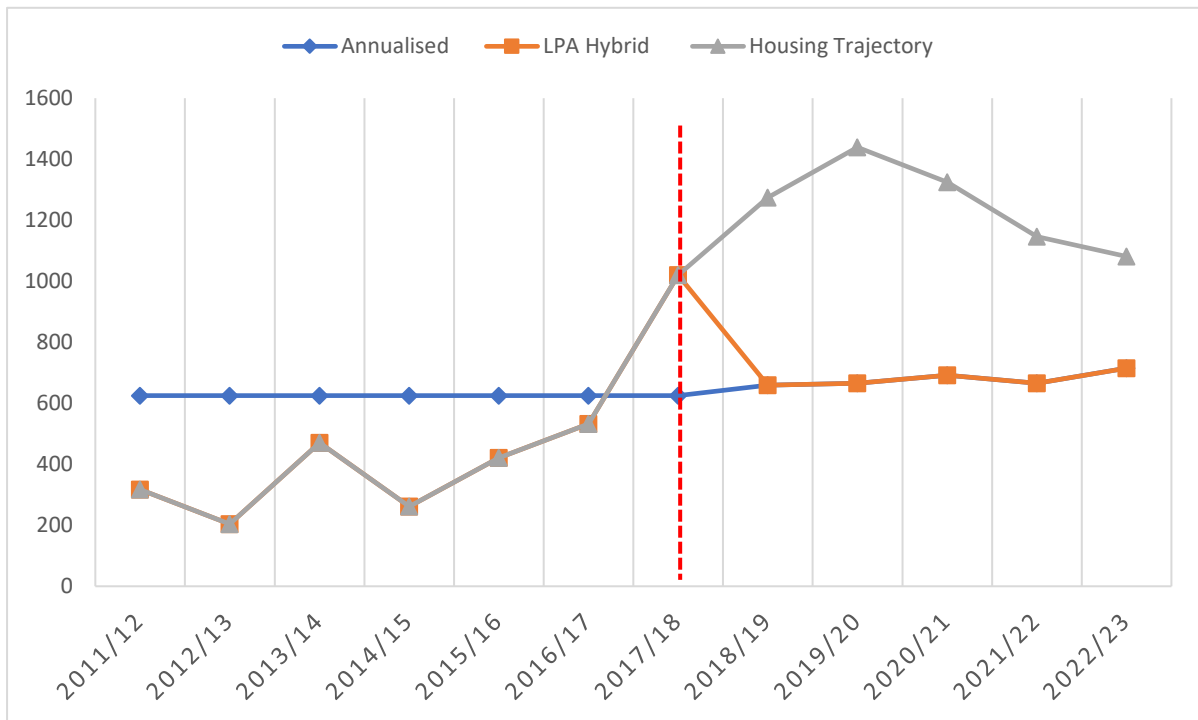


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if the Council's preferred approach of using its LPP1 housing trajectory is extrapolated over the period to 2023 in full, then there is a significant shortfall of -1,686 dwellings.

- 2.12 This consequence of the Council's hybrid approach to using past completions and its housing trajectory as its benchmark housing requirement up to 2018, and then switching to an annualised requirement when it became high, is shown graphically in Figure 3.

Figure 3: Housing Requirement 2011 – 2023



- 2.13 The point in time when the switch was made is shown graphically by the red dashed line, with the LPA's unique Hybrid approach shown in yellow. This mirrors the Grey Line, which is the actual completions achieved from 2011-2016 and projected completions from 2016 to 18, then falls back to the Standard Methodology annualised requirement when the Grey peaks and tracks at a higher level.



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- 2.14 The Council's reasoning for the change in methodology is set out in Para 3.1.10 of the AMR, where it states that *'The Local Plan trajectory (Appendix 3.7) can be used to determine the requirement up until April 2018, when the housing requirement reaches 5 years old and the 'local housing need' figure must be used to determine the annual requirement thereafter.* (Para 3.1.10 AMR December 2023)
- 2.15 While the principle of using the local housing need figure is not questioned, the statement is flawed as we know that the Council did not use a housing requirement in the period from 2011-2018 as it should have done, instead, it used in the period 2011-2016 its actual housing completions to define its housing requirement (which cannot by any stretch be considered a sound approach) and from 2016-2018, what it had predicted would be completed from the sources of supply at the time.
- 2.16 Far from meeting its housing requirement in the period from 2011 to 2018, the Council's benchmark of 3,266 dwellings was some -1,149 dwellings below the actual Housing Requirement of 4,375 [625 x 7] during this period.
- 2.17 As shown within Figure 2, when compared to the actual housing requirement of 625 per annum, the shortfall by March 2018 was -1,599 dwellings. In the period from April 2018 to March 2023, when the requirement is then taken as the Standard Methodology as detailed within the Council's Appendix to its AMR December 2023, combined with the increase in housing completions, has removed this shortfall and resulted in a minimal oversupply of **32 dwellings**.
- 2.18 Notwithstanding the use of housing completions to represent requirement, if the Council had continued to use its Housing Trajectory as its benchmark housing requirement through to 2023, the resulting shortfall would equate to -1686 dwellings as the starting point for consideration of the housing supply position now.



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- 2.19 It is our considered view and in line with best practice, that the starting point for consideration of the housing supply position as of April 2023 shall be based on the housing requirement the Council was required to deliver in the period 2011-2023, against which the housing delivery performance from the Period 2011-2023 is compared. This follows best practice and simply compares requirement v's completions with a consistent methodology.
- 2.20 The mathematical conclusion being there is no over supply of 1,187 dwellings as advocated by the Council (1,181 dwellings as shown in Figure 2), but a marginal oversupply of 32 dwellings in the period 2011-2023.



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3. Calculating the 5 year housing requirement

- 3.1. This Section of the Paper looks forward and the calculation of the housing requirement over the 5 year period. We are of course in a period of transition from the current NPPF at the time of writing (October 2024), with the Government setting out its clear expectations on Local Planning Authorities to boost the supply of housing, while applying a revised Standard Methodology.
- 3.2. As a Local Planning Authority, Winchester City Council has chosen to rush to the publication of its Regulation 19 Draft, in the hope that it can comply with the transitional arrangements and thus be judged under the previous Standard Methodology. There has been no disguising the LPA's motivation in accelerating the production of its Local Plan, which is to avoid the Government's priority of increasing the supply of new homes across the Country.
- 3.3. Whether it succeeds in this, will be a matter for the Ministry of Housing, Communities and Local Government (MHCLG), as well as the view of the appointed Inspector if indeed the Local Plan reaches Examination.
- 3.4. Given the failings of the LPA in the calculation of its performance since 2011, from which it mistakenly derives an 'oversupply' of housing, it is necessary to critique the Council's stated housing requirement against its stated supply. In the context of the Council not only seeking to proceed at speed to avoid the revised Standard Methodology, but also hold back the delivery of housing sites via Policy H2, it is also necessary to compare the Council's stated position against the new Standard Methodology and emerging PPG advice.
-
- 3.5. The Council sets out its position in Para 3.1.12 of the Appendix to the AMR December 2023, where having established the housing need figure of 692 dwellings per annum (3,460), it then deducts 742 dwellings, this being its presumed oversupply of 1,187 / 8 years remaining in the Plan Period [148] x 5.



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3.6. At this point the 5% buffer is added, to provide for the Council's figure of 2,854 dwellings required in the Period April 2023 to March 2028 (See Para 3.1.12 AMR Appendix December 2023).

3.7. For the purposes of this comparison, the data contained within the Standard Method Annual Need Table H1 of the Regulation 19 Draft has been used. This sets an annual requirement for the year 2023 to 2024 as 691 dwellings, and thereafter 676 dwellings per annum. When combined with the level of over supply from 2011 to 2023 as evidenced in Section 2 of this Paper, the actual housing requirement for the Period April 2023 to March 2028 is as follows:

Figure 4: Former Standard Methodology Housing Requirement 2023 – 2028

Housing Need 2023/24	691 dwellings
Housing Need 2024-28	2,704 dwellings [676 x 4]
Over Supply at March 23	- 20 dwellings [32/8 x 5] ³
Sub-Total	3,375 dwellings
5% Buffer	169 dwellings
Total	3,544 dwellings

3.8. Numerically, this is 690 dwellings more than the Council has projected at the point of April 2023, and a consequence of applying the correct methodology to the housing requirement from 2011-2023.

3.9. In the absence of the actual completions achieved in 2023/2024 being known, to set a base date of April 2024, it'll be necessary to use the Council's projected net completions of 971⁴ dwellings for the year April 2023 to March 2024, with the Standard Methodology rolled forward by one year. This provides for the following benchmark position:

³ Uses the same methodology as applied by the LPA to its assumed Over Supply

⁴ Para 3.1.13 Appendix to the AMR December 2023



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Figure 5: Former Standard Methodology Housing Requirement 2024-2029

Housing Need 2024-29	3,380 dwellings [676 x 5]
Oversupply at March 24	-315 [971 – 676 – 20]
Sub-Total	3,065 dwellings
5% Buffer	153 dwellings
Total	3,218 dwellings

- 3.10. This compares to the Council's stated position in its AMR of 2,534 dwellings, where it uses the Standard Methodology annual need of 692 dwellings per annum⁵. While the data within Figure 5 has used the Standard Methodology figure of 676 as contained within the Regulation 19 Draft (Table H1), if a direct comparison was made, then Figure 5 would increase to 3,302 dwellings.
- 3.11. For this assessment, the Regulation 19 Draft figure as shown within Figure 5 will be used and a 5 year requirement benchmark of 3,218 established at April 2024.
- 3.12. The assessment and the data provided within Figure 4 and 5 is of course only relevant if the MHCLG accept that the Winchester District Local Plan can be considered under the NPPF transitional arrangements, notwithstanding the LPA being aware of the intentions of the Government, the proposed amendments to the NPPF and the revised Standard Methodology prior to publishing the Regulation 19 draft for consultation.
- 3.13. In reality, the 5 year requirement from 2024 to 2029 is a much simpler calculation under the Government's new Standard Methodology, given the Government's intention to remove the use of oversupply within the context of calculating the 5 year requirement. Pending the outcome from the consultation, which will not be known before the Council's deadline for submission of representations, the 5 year requirement from 2024 to 2029 will be as follows:

⁵ See Table 4 – Housing Requirements AMR Dec 2023



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Figure 6: New Standard Methodology Housing requirement 2024-2029

Annual Housing Requirement 2024-2029	1,009 dwellings
Sub-total 5 Year Requirement	5,045 dwellings
5% buffer	252 dwellings
Total 5 Year Requirement	5,297 dwellings

- 3.14. To put this into context and how significant applying the new Standard Methodology to Winchester City would be, compared to the LPA's artificially diluted 5 year requirement 2,534 dwellings, the Government's new Standard Methodology would see a 109% increase in the housing requirement within the District by 2029, aligning with the Government's stated aims to boost the supply of housing and deliver 1.5m new homes during the Parliamentary Period.
- 3.15. This we contend is the true requirement, that aligns with National Policy and removes the incorrectly calculated levels of oversupply that the LPA has sought to dilute in its obligation to meet housing need within the District.



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4. Housing Supply

- 4.1. Having established the basis for the 5 year housing requirement, this section of the Paper examines the Housing Supply and critiques the LPA's stated position.
- 4.2. As per Table 11 of the AMR Appendix, the Council contend that it has a deliverable supply of 4,152 dwellings at April 2023 and 3,849 dwellings at April 2024, which it advocates demonstrates 'ample' land availability of 7.3 years in April 2023 and 7.6 years in April 2024. As set out within Section 2 and 3 of this paper, this position is false, as it doesn't consider the error of the LPA in using its own housing completions as its housing requirement in the period 2011-2016, and the overall shortfall that occurred up to 2018.
- 4.3. As per Figure 7, the Council's assumed supply is set out against its stated 5 year requirement at April 2024, the adjusted 5 year requirement at April 2024, which only uses the Council's Housing Requirement in the period 2011-2024 as per the Practice Guidance, and finally what this would mean under the Government's new Standard Methodology (SM), which the Council will be required to address.

Figure 7 – 5 Year Housing Land Supply (assumed all of the LPA's supply comes forward)

5 Year requirement at April 2024		Supply	Years Supply
LPA Assessed old SM	2,534	3,849	7.6
Adjusted with old SM	3,218	3,849	6.0
New SM	5,297	3,849	3.6

- 4.4. Even assuming that all of the Council's projected supply comes forward, the Council are only just above the threshold at 6 years, once the error in the Council's calculation of requirement



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and oversupply is taken into account. Based on the Government's new Standard Methodology, this falls to 3.6 years.

- 4.5. It is necessary to review the sources of supply, particularly those large sites that are yet to commence, and which the Council is identifying completions from within the period 2024-2029. We have the benefit of course for being towards the end of this first year of the 5 year period at the time of writing in late 2024, and therefore it is possible to assess with more accuracy the likelihood of the Council's projections coming forward.
- 4.6. The first site is commonly known as Silver Hill, with the Council showing 130 completions in the period to 2029, as shown within Figure 8. The project consists of a major redevelopment of the City Centre, which involves a number of parties and complex assembly. No Planning Application exists, with a consent, discharge of conditions and commencement a number of years away. The Council led project has continually stalled over the past 10 years, with nothing to suggest that will change in the immediate future.
- 4.7. The majority of the dwellings proposed are also in the form of flats, which in respect of completions, will not occur until later into the build period due to the need for completion of the structure as a whole, when compared to individual dwelling houses. That said, there has been some progress of demolition in recent times, so it is feasible one could see some completions in 4.5 years time. As such, the timeline has been moved out by 12 months.
- 4.8. The second site, referred to as the Cattlemarket, is very complex in its scale and requires a planning application to be formed, lodged, consented and once conditions are cleared, for the project to commence.
- 4.9. Forming part of the Station Approach project, a previous outline Planning Application was challenged and quashed. With less than 4 years and 5 months left of the 5 year period, the nominal 30 dwellings allowed for by the Council is a token amount, and not one supported by evidence. Similarly to the Silver Hill project, the project is reliant upon flattened



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development, which requires the completion of structures and fit out as whole before practical completion certificates can be issued and completions recorded.

- 4.10. The third site is Land East of Sun Lane, New Alresford, with the Council projecting 20 completions by the March 2025. The latest information on the developer’s website indicates show home opening in ‘Spring 2025’, which doesn’t support the Council’s current position of 20 completions by March. The project has stalled at its inception regarding access to the site for construction purposes, with construction only recently commencing in earnest. As such, the expected completions cited by the Council has been moved out by 12 months.

Figure 8: Adjusted Supply – Local Plan Allocations / Outline Consent sites

	24/25	25/26	26/27	27/28	28/29	24-29
Land East of Sun Lane	20	40	50	50	50	210
Revised	0	20	40	50	50	160
Silver Hill	0	0	0	50	80	130
Revised	0	0	0	0	50	50
Cattlemarket	0	0	0	0	30	30
Revised	0	0	0	0	0	0

- 4.11. The adjustments of these three sites would reduce the supply by 160 dwellings from 370 to 210, which is a more robust assessment of what are for the two Council led projects, ones that have a history of stalling and are complex.
- 4.12. Reducing the projected supply by 160 dwellings has the resulting effect as shown within Figure 9.



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Figure 9: Adjusted 5 Year Housing Land Supply

5 Year requirement at April 2024		Supply	Years Supply
LPA Assessed old SM	2534	3689	7.3
Adjusted with old SM	3218	3689	5.7
New SM	5297	3689	3.5

- 4.13. Far from a supply north of seven years, assuming that all of its projected supply comes forward save for those sites as adjusted within Figure 8, the Council would only be able to show 5.7 years when the old Standard Methodology is used, and 3.5 years when compared to the new Standard Methodology.



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5. Policy H2 Phasing

- 5.1. The Council's Strategic Policy H2 seeks to hold back greenfield allocations and Neighbourhood Plan sites on the premise to *prioritise the development of Previously Developed Land and achieve a suitable housing trajectory* (Policy H2).
- 5.2. The Council's intention is that the sites are held back until post 2030, unless they are needed to overcome a district level housing land supply shortfall. As evidenced within this Paper, the Council does not have anywhere near the Land Supply it purports to have, given the errors made by the LPA in using its housing trajectory and actual levels of housing completions in years 2011-2018 as its 'housing requirement', against which it seeks to be judged and against which it has created an artificial oversupply. As shown, when the supply of housing within the District since 2011 is compared against the actual housing requirement as required by the Practice Guidance, there is only a marginal oversupply and the projected years supply falls to 5.7 years as shown within Figure 9.
- 5.3. Indeed, the brownfield sites the Council are advocating have priority, are its very own large regeneration projects within the City (Silver Hill, Station Approach, Bar End Depot), which have continuously failed to come forward.
- 5.4. Far from having a significant buffer, based on the former Standard Methodology, the Council can only show less than 6 years supply. There is no sound reason therefore why there should be a phasing policy within the Local Plan, artificially holding back the delivery of new homes at a time when the Government, via its revised NPPF and the revised Standard Methodology, is imploring Local Planning Authorities to accelerate housing delivery.
- 5.5. Such a policy is the antithesis of the Government's Policy direction and should be struck out on this basis alone.
- 5.6. There is a second, equally relevant test of soundness failing and that is the Local planning Authority has not examined the consequences of its Policy on individual Towns and Villages, but on a macro level District Wide.



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- 5.7. As per the Government's recent revisions to the NPPF, its policy shift is designed to re-emphasise the importance of choice and competition in the market⁶, with Policy H2 restricting the ability for choice and competition where sites are being artificially held back.
- 5.8. By way of example, the Neighbourhood Plan process for New Alresford provides local communities with the ability to shape the location and delivery of new homes within their Towns and Villages.
- 5.9. The principle of prioritising brownfield land only works if there is sufficient brownfield sites to meet the required housing need in advance of Greenfield Sites. The justification for its approach as set out within Pages 37 and 38 of the Housing Topic Paper, only considers the District as 'a whole', which is weighted heavily to the City of Winchester, with no analysis of housing need v's brownfield supply within individual towns and villages.
- 5.10. For Towns such as New Alresford which are for the most part reliant on Greenfield Sites coming forward to meet its housing requirement, an artificial constraint will mean the housing required is simply not delivered. This will have damaging socio and economic effects on the local communities in the absence of open market and affordable housing tenures being delivered, with reduced choice and competition.
- 5.11. The Inspector will note with regard to New Alresford, the Local Plan Part 1 adopted 11 years ago in 2013, required the delivery of 500 new homes within the Market Town. To deliver this quantum of housing, land east of Sun Lane was allocated for 'about 325 dwellings' and land at the Dean for 'about 75 dwellings' via the Local Part 2 (2017), along with a projection of commitments and a windfall allowance.
- 5.12. While development has progressed at the Dean, much of this is limited to age restricted housing, with the development at Sun Lane only recently commencing with infrastructure works.

⁶ Proposed reforms to the National Planning Policy Framework and other changes to the planning system Para 23



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- 5.13. As per Table 6.9 of the 2023 Winchester AMR Report (Figure 10), the recent lack of housing delivery in New Alresford is plainly evident when compared against the other Market Towns, with only 14 new homes completed in the year 2022/23 and some 290 dwellings of the 500 dwellings from the adopted Local Plan still to be completed.

Figure 10: Extract from AMR showing Completions within the Market Towns and Rural Areas

6.9 Table: Housing Distribution across the MTRA Area from LPP2

Settlement	Requirement	Net Completions 01.04.2011 – 31.03.2023	2022 - 2023	Outstanding
Bishop's Waltham	500	527	117	-27
New Alresford	500	210	14	290
Colden Common	250	208	86	42
King's Worthy	250	192	6	58
Swanmore	250	205	1	45
Waltham Chase	250	215	1	35
Wickham	250	79	3	171
Total	2,250	1,636	228	614

- 5.14. Given only 42% (210 dwellings) of the requirement for New Alresford has been completed in the first 13 years of that Plan Period (2011-2031), this shortfall will only be exacerbated further by artificially resisting the additional 100 dwellings proposed via the Neighbourhood Plan until post 2030.
- 5.15. Moreover, with only one large scale development proposed for the Town in the coming years, holding back the sites to be allocated within the Neighbourhood Plan would significantly hinder choice and competition for the community of New Alresford.
- 5.16. Clearly such an approach is not 'justified' when compared against the reasonable alternative of seeking to boost the supply of new homes, not only within New Alresford but across the District.
- 5.17. It cannot be the case that at a time when the Government is seeking from housing developers the delivery of 1.5m new homes in the Parliamentary Period, that a Local Plan that artificially holds back deemed sustainable housing sites would be deemed 'justified' and 'consistent with National Policy'.



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6. Conclusions and changes required

- 6.1 This Paper has evidenced a significant error in the methodology used by the City Council in calculating its housing performance, which has been used to firstly quantify an oversupply that doesn't exist, and compounded this position by seeking a housing policy that artificially holds back housing sites as a result.
- 6.2 The but the most basic principle of assessing performance in line with the Practice Guidance is to compare what you have delivered (housing completions) against the quantum of housing the required (housing requirement). The LPA has for the period 2011-2018 failed to do this, and instead for the Period 2011-2016 deemed what it actually completed to be its 'requirement', and from 2016-18, what it had projected it could complete, totalling 3,226 dwellings. In reality, the true housing requirement during this period was 4,375 new homes.
- 6.3 This is far from a sound basis upon which a judgement on past performance can be taken, with this Paper showing that when judged against the Council's actual housing requirement, the supply results in only a very small oversupply of 32 dwellings in the period from 2011-2023.
- 6.4 This error should be recognised by the LPA and the Inspector, and the necessary corrections made to the Council's stated position. Thereafter, in recognition of the conflict in the phasing Policy with both the Council's land supply position and National Policy, Policy H2 should be removed and the phasing of sites removed from the Local Plan.



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Appendix 1 – LPP1 Housing Trajectory

Local Plan Part 2 Housing Trajectory

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	TOTAL	
Local Plan Part 1 Housing Trajectory																						
Commitments and SHLAA sites (within settlement boundaries)						366	394	389	336	205	66	87	116	167	122	58	22	21	21	7	2377	
Strategic Allocations						166	506	605	733	750	775	775	725	725	675	525	310	210	129	0	7609	
Local Plan Part 2/Windfall						0	120	280	370	369	305	219	156	120	129	122	80	87	72	70	2501	
Total Projected Completions						532	1020	1274	1439	1324	1146	1081	999	1012	926	705	412	318	222	77	12487	
Total Past Completions	317	204	470	262	421																1674	
Cumulative Completions	317	521	991	1253	1674	2206	3226	4500	5939	7263	8409	9490	10489	11501	12427	13132	13544	13862	14084	14161	14161	
Annual Average	625	625	625	625	625	625	625	625	625	625	625	625	625	625	625	625	625	625	625	625	625	12500
MONITOR - dwellings above or below cumulative allocation																						
MANAGE - Annual requirement using past/projected completions	308	-729	884	1247	1451	-1544	1149	-500	314	1013	1534	1990	2364	2751	3052	3132	2919	2612	2209	1661	1661	
	625	641	666	677	703	722	735	713	667	596	524	455	376	287	167	15	-158	-348	-681	-1584		

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ALFRED HOMES

Appendix 2 – Figure 2

Monitoring Year	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	TOTAL	Communal Accommodation
Annualised Housing Requirement														
Completions	625	625	625	625	625	625	625	659	666	692	665	715	7772	
Cumulative Position	-308	-729	-884	-1247	-1451	-1521	-1599	-1448	-1478	-1372	-896	-567	-567	32
LPA 'Hybrid' Housing Requirement														
Completions	317	204	470	262	421	532	1020	659	666	692	665	715	6623	
Cumulative Position	0	0	0	0	0	23	-450	-299	-329	-223	253	582	582	1,181
LPP1 Housing Trajectory														
Completions	317	204	470	262	421	532	1020	1274	1439	1324	1146	1081	9490	
Cumulative Position	0	0	0	0	0	23	-450	-914	-1717	-2243	-2248	-2285	-2285	-1686