

SENT BY EMAIL  
[mark.behrendt@hbf.co.uk](mailto:mark.behrendt@hbf.co.uk)  
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Dear Inspector

## **WINCHESTER LOCAL PLAN – HOUSING SUPPLY**

1. Thank you for the opportunity to comment on the additional evidence and commentary provided by the Council with regard to the plan period and housing trajectory.
2. In terms of overall supply, the Council have maintained the assumption that 350 homes will be delivered in the SDNPA and have included a supply estimate of 319 homes in the trajectory commencing in 2022 and 312 homes in 2024. HBF does not challenge the inclusion of these homes but note that the estimates used are not consistent with the assumptions made by the NPA that 250 homes will be delivered in the NPA over the plan period (12.5 dpa). We also note that using the Council's trajectory in its Matter 4 statement results in supply between 2024 and 2040 of 10,909 dwellings not 10,794 dwellings which is the level of supply between 2024/25 to 2039/40. Adding the 16 years of supply from the SDNPA (16\*12.5), i.e. 200 homes, results in a total supply of 11,109. This is a surplus of 293 homes and is a significant reduction compared to the submitted plan. HBF also considers it necessary for the plan period to be extended by a year to ensure consistency with paragraph 22 of the NPPF. This results in total housing need of 11,492 homes and a shortfall once delivery in the national park has been taken into account (and accepting an additional year of windfall at 115 dpa) of 255 dwellings, with no supply available to contribute towards unmet need.
3. One of the concerns raised by the Council from the amended trajectory is that the number of homes that will be delivered to meet the needs of Portsmouth and Havant have been reduced. This argument is not strictly true given that the homes removed from the trajectory have already been built. No allocations have been removed from this plan as a result of the change in the plan period reducing the supply of homes. The homes built between 2020 and 2024 will not be erased if the plan period is amended and if any of these homes have been built to meet the needs of Havant and Portsmouth then that will remain the case – though it is important to note that there was not agreement prior to this plan being prepared that any of the homes built between 2020 to 2024 were being built to meet the needs of Portsmouth or Havant.
4. The fact that the Council now considers there to be fewer homes to address unmet needs in Havant and Portsmouth is more an indication that there was no active cooperation towards meeting their needs and that the Council have not used DtC to maximise the effectiveness of plan preparation in Winchester. Indeed, the approach taken by Winchester is similar to that taken by Mid Sussex where the inspector outlined her concerns regarding

the lack of clarity in how many homes would be included to address the unmet needs in Crawly and Horsham. In her post hearing letter, which also sets out why she considered the Council to have failed the duty to co-operate she states at paragraph 55:

*“This lack of clarity is pertinent as during the Plan’s preparation the surplus has varied from 302 dwellings at the Regulation 18 consultation (which was purely to ensure resilience for MSDC), to 996 dwellings in relation to the Regulation 19 plan, and finally after submission, within the agreed SoCG, the Councils suggest a headroom of 1,208 dwellings. All these changes have taken place without any additional allocations. Consequently, there must be a significant question mark as to how reliable any potential contribution would be in meeting unmet needs”.*

5. The approach taken by Winchester is similar to that taken by Mid Sussex. The contribution towards unmet needs was not fixed. This is why if the plan period is reduced so is the contribution to unmet needs – there was no active planning to allocate additional sites address the unmet needs of neighboring areas. The Council are using the surplus in the number of homes already in 2020 to 2024 to meet the future needs of Havant and Portsmouth. Whilst agreement was reached post regulation 19 as to the proportion of the surplus which would be allocated to each authority, there was proactive planning to identify additional sites to meet needs. This was simply a piece of accountancy and indicates a failure to co-operate effectively during the preparation of the local plan.
6. In ED34A the Council also states that there is no specific guidance as to the start date of the local plan in either NPPG or NPPF and that it is based on professional judgement. However, whilst there is no specific guidance PPG is clear that assessments are undertaken using up to date information with the current year being the base year for any assessment. These elements of national policy have been ignored by the Council, who instead chose to start the plan period simply as a means to include years of higher delivery. As well as being inconsistent with national policy it is not a positive approach to plan making required by the NPPF and must be considered unsound.
7. Turning to question 2, the primary reason for the phasing of housing supply would now appear to be the issue of nutrient neutrality and demand for phosphorus mitigation. However, it is not clear why this specifically needs a phasing policy given that schemes will be required to have mitigation if they are to be approved and it ignores the potential for developers to bring forward their own mitigation schemes. If development cannot secure appropriate mitigation, then the council can refuse the development on those grounds – there is no need for the phasing policy in these circumstances.

Yours sincerely,

**Mark Behrendt**  
**Regional Planning Manager**