



STAGE 1
MATTER 4, POLICY H2

EIP – WINCHESTER
DISTRICT LOCAL PLAN
2020-2040

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Client	Clay Family
ID	ANON-AQTS-32MY-4
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1.0 **INTRODUCTION**

- 1.1 This Statement is made on behalf of the Clay Family, in response to the matters, issues and questions raised in ED13 Inspector's Note V2 in relation to the Stage 1 Hearings.
- 1.2 This Statement accords with the guidance issued by the Inspector in ED14
- 1.3 This Statement focuses only on the matter which relate to the stepped phasing of the Local Plan, concerning the overall supply of housing Q5 and Q6

2.0 **MATTER 4 MEETING HOUSING NEED**

Q5 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?

- 2.1 The LPA, in its Housing Topic Paper Update EDO2, under the heading *Effect of Phasing Policy H2*, para 6.8 et al, states that the reason for phasing is to spread out the completion rate over the five years from 2030 in order to avoid a shortfall in housing at a later stage of the Plan and therefore enable it to remain relevant and up-to-date. The LPA has decided to proceed with the Local Plan based on the previous NPPF (Dec 23) but acknowledges in para 2.6 that the Local Plan the housing requirement over the Plan Period is less than 80% of the new Standard Method figure. So, the LPA recognise and acknowledge that there will be a shortfall in housing numbers and as required under the NPPF (Dec 24) work will have to begin immediately on the new Local Plan to address this situation. This approach to the phasing of housing is therefore at odds with the requirement to significantly boost housing land supply, where it is acknowledged going forward that more housing will have to be provided. Boosting of supply means raising delivery of housing not restricting it.
- 2.2 The danger with relying on a trajectory is that it is only a forecast and there are a number of variables which can throw it off course. Larger sites on which the Local Plan is reliant on are particularly prone because of their scale. Delivery and completion rates can be thrown off course by skill shortages, supply shortages and other unforeseen constraints which are more likely to arise on a larger site. Completion rates are affected by economic

trends. At present there are strong headwinds slowing down the economy, including Trump's recent tariff announcement. Whereas a small house builder will be more fleet of foot and more reliant on income from the sale of housing to recover costs, a larger housebuilder developing a larger site, is more often than not be dictated to by their shareholders and more likely to afford to mothball sites to save costs where there is a downturn. Therefore, it is appropriate to reduce these potential risks by ensuring that there are no timing restrictions on sites creating a greater chance of boosting the supply more quickly in accordance with Paragraph 60 of the NPPF.

- 2.3 As different sites are affected by different economic variables and constraints if all the sites are released, they will not be all developed at the same time.
- 2.4 Furthermore, a greater supply of housing will reduce price and therefore the market will moderate its behaviour by reducing supply particularly for the larger sites where cashflow is not as critical. Therefore, the completion rates will be more moderated than is suggested by the LPA's trajectory.
- 2.5 In addition, nutrient neutrality and grid capacity places its own constraints on the marketplace by pushing up house prices and preventing sites from coming forward for development because of additional costs. It therefore has the potential to frustrate the completion rates.
- 2.6 Therefore, to deliver housing quickly, the LPA should remove the phased approach to housing delivery as the more sites that are available to be built out following adoption of the Local Plan the greater the flexibility to respond and deliver on the housing needs of the area.
- 2.7 In conclusion there is an identified need and immediate future shortfall in housing which the LPA acknowledge and thus the market should not be artificially constrained.

Q6. 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)?

- 2.8 If the phasing is removed then the approach taken by the LPA would be more effective, justified and consistent with the NPPF in helping to boost supply.