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Inspector R Barrett MRTPI IHBC
Winchester City Council Local Plan Examination,
Winchester City Council Offices,
Colebrook Street, Winchester,
Hampshire,
SO23 9LJ.

24th July 2025

Dear Inspector Barrett,

EXAMINATION OF THE WINCHESTER DISTRICT LOCAL PLAN 2020-2040

COUNCIL NOTES ED25 AND ED34.

As you know, Carter Jonas is instructed by Wates Developments Ltd. ('Wates'), and as such this letter is in response to your note 15, of 1st July 2025, inviting comments on the Council's notes ED25 and ED34.

The Plan period

Wates is firmly of the view that the Plan period should start in 2024. While the Council's argument about a lack of direct guidance on the point is noted; there is sufficient across the PPG which directs that the date of the Local Plan submission is the starting point for calculating Local Housing Need, and therefore it is logical that this should be the start of the plan period. It is also the case that PPG is clear that past trends are considered in the Standard Method (Reference ID: 2a-011-20241212) and therefore there is no need to consider delivery prior to 2024.

As was also set out in writing, and orally, at the examination it is likely that the plan will be adopted in 2026, and therefore its end date should be 2041 (to ensure a 15-year horizon on adoption as required by NPPF paragraph 22).

Overall supply of homes

Wates broadly supports the Council's position on its overall supply but notes that there appear to be some errors, or discrepancies, in the calculations at the bottom of page 1 of ED34b, for the period 2024-2040:

- The Council's Matter 4 Statement trajectory 2024-2040 = **10,909** (not 10,794 as suggested in ED34b).
- The Council continues to use a supply figure for SDNP derived from a capacity for 350 homes from 2020, where the National Park Authority's position is a capacity of **250** dwellings.

This gives a total supply of 11,159 dwellings. Considering this against requirement of 10,816 dwellings give a surplus of 343 dwellings.

Wates has some concerns that this figure is still being presented as available for unmet needs, and as flexibility in the event of slow delivery, so some clarity on this point would make for a more robust plan. Wates's suggestion is that unmet needs are a matter which can be resolved through as single-issue review and need not hold up the adoption of this plan.

However, Wates does note that the plan period should be extended by a year, and adding another 676 dwellings would lead to an overall plan deficit of 333 dwellings, albeit that the Council's suggested supply does not extend for another year. It is apparent that additional sites – and/or allowing for the full development of Land at Brightlands – will be necessary to ensure a sound and deliverable plan.

Wates reiterates that its detailed technical work on Land at Brightlands means there is greater certainty that it has a deliverable capacity for 120 new homes (an additional 60 dwellings). This would further boost the housing supply in the plan on a pre-existing draft allocation which has been subject to numerous assessments and consultation as part the preparation of the local plan.

Five years housing land supply

Wates notes the Council's various calculations set out in ED34b and suggests that the most appropriate tables are those for 2024-2040 (albeit that the end date is incorrect as above).

Wates is of the opinion that the Council has underestimated its position, and that the supply is slightly healthier than proposed. There is no need to apply the 20% buffer to the housing requirement until after July 2026 according to the NPPF transitional arrangements. The whole of the 5-year requirement should have a 5% buffer in 2025 and should be **3,549 dwellings**, and considering the Council's trajectory in its Matter 4 statement the supply appears to be **4,232 dwellings**. This leads to a five-year housing land supply calculation of 5.96 years (more positive than in ED34b).

However, if this is projected forward, and from 2026 when a 20% buffer is added to the whole of the 5-year calculation then the picture becomes less positive. It falls to around 5.5 years 2026 and 2030 and then it appears to fall below 5 years after 2031.

One change that would help the housing land supply (and the Local Plan trajectory) in the short to medium term, is the maintenance of the current assumed phasing of sites in the trajectory, **but** with the removal of the policy H2 restriction. This will allow schemes to come forward (where developers can secure sufficient mitigation) and boost the housing supply, as might be necessary. This is a more positive approach, as is explained below.

Forced phasing of greenfield sites

Wates has continually, and consistently, presented strong objections to proposed policy H2; it is unsound. The Council is reiterating its arguments that nutrient neutrality and demand for phosphorus mitigation is sufficient reason to seek the phasing of development, but this is not justified. Solutions can be found on a site-by-site basis, and to drive forward nutrient neutrality in the district, localised mitigation solution must be encouraged to create wider sustainability benefits. If a site-specific solution cannot be found, then the Council can manage this through the development management process as a material situation and can ultimately be used to refuse consent. There is no justification for an additional and specific policy on this matter.

Moreover, the concerns cited regarding the capacity of the electricity grid which the Council concedes is not "*such a pressing issue*," should not be presented as a barrier in the delivery of homes on allocated greenfield sites. A balanced approach should be undertaken to overcome the competing crisis of housing and energy.

I trust that these comments are helpful in your deliberations, and we look forward to hearing your conclusions on these matters.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Peter Canavan', with a long horizontal flourish extending to the right.

**Peter Canavan BA(Hons) MSc MRTPI
Partner**

Three lines of contact information (phone, email, and address) have been redacted with black boxes. Each line is preceded by a small black square bullet point.