



Formal Response to Planning Inspector

Winchester City Council – Response to Notes ED25, ED34a and 34b

Prepared on behalf of Persimmon Homes (South Coast) Ltd

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Council Notes ED25 and ED34a and b

The Inspector invited comments on Council notes ED25 and ED34a and b from representors who commented on the matters raised in them at Regulation 19 stage.

1. Response to Note ED25 regarding the proposed adjustment of the Local Plan start date

- 1.1 In response to Note ED25 regarding the proposed adjustment of the Local Plan start date to 2022 or 2023, we wish to express concern over Winchester City Council's decision to revise the plan's base year without extending its end date beyond 2040. This change shortens the plan period from the originally intended 20 years to as little as 16, technically meeting the minimum 15-year requirement post-adoption but falling short of the Council's stated ambition for a comprehensive 20-year strategy.
- 1.2 Shifting the base year from 2020 to 2022 or 2023 would reduce both the overall housing requirement and the projected supply trajectory. This has significant implications for unmet housing need, five-year land supply calculations, and the robustness of the supporting evidence base. It also compresses the timeframe for delivering strategic sites, including key greenfield allocations, and limits flexibility to respond to evolving housing demands. Moreover, this approach appears to diverge from the Inspector's call for a more forward-looking and resilient plan.
- 1.3 A more transparent and effective solution would be to extend the plan period to 2042 or beyond, preserving the original 20-year vision and ensuring alignment with long-term growth objectives.
- 1.4 The impact of a revised start date is substantial:
 - A 2022 start reduces the surplus available to meet unmet needs by 42% (from 1,900 to 1,099 homes).
 - A 2023 start results in a 63% reduction in homes (to just 714 homes towards unmet need). This significantly weakens the Council's ability to accommodate cross-boundary housing shortfalls.
- 1.5 Such a change would also require:
 - An updated Housing and Economic Development Needs Assessment (HEDNA) reflecting the new baseline.
 - Revised infrastructure phasing in the Infrastructure Delivery Plan.
 - New Integrated Impact and Habitats Regulations Assessments covering the amended timeframe.
- 1.6 In summary, amending the Local Plan's start date to 2022 or 2023 undermines the surplus against objectively assessed need, destabilises the evidence base, disrupts infrastructure planning, and risks breaching Duty to Cooperate obligations.



2. Response to Notes ED34a and ED34b – Deletion of Strategic Policy H2

- 2.1 Winchester City Council's current approach delays the release of greenfield sites until 2030, primarily due to nutrient neutrality concerns. This creates an artificial ceiling on housing supply by assuming a fixed timeline for mitigation capacity, rather than enabling the market to respond dynamically. Allowing sites to come forward earlier—subject to securing nutrient credits—would uphold environmental standards while incentivising investment in both off-site and on-site mitigation solutions. This would accelerate housing delivery and alleviate affordability pressures.
- 2.2. In Denmead, nitrogen neutrality is the main issue that constrains development, as the village lies within the Test and East Hampshire catchment where phosphate is not a barrier. There is a proven track record of developers securing effective nitrate mitigation, whether through on-site measures, off-site habitat enhancements, or the purchase of credits and, in any event, planning permissions are only issued once robust mitigation is in place.
- 2.3 Taking into account the comment made regarding capacity of the electricity grid before 2030, this is not considered a constraint in Denmead.
- 2.4 As set out in our Matter 4 statement, specifically our answer to question 12, there are no justified planning reasons for delaying sites coming forward until 2030.

Planning Benefits of Removing Policy H2

- 2.5 The planning benefits of removing Policy H2 would front-load the delivery of greenfield allocations by approximately 40–120 dwellings per annum during years 1–5. This would:
- Strengthen short-term housing land supply buffers.
 - Provide a more immediate response to pressing housing needs.
 - Improve alignment with the Council's strategic objectives and national policy expectations.
- 2.6 Without the phasing restriction imposed by H2:
- Developer contributions via S106 and CIL would be triggered earlier, at the point of permission.
 - This would unlock timely infrastructure delivery, including transport upgrades, school expansions, and utility enhancements.
 - Aligning funding with early growth prevents capacity shortfalls that could otherwise hinder later-phase delivery.
- 2.7 The removal of Policy H2 warrants a focused Addendum to the Sustainability Appraisal and Habitats Regulations Assessment. Initial modelling indicates that earlier greenfield delivery is associated with higher developer margins, which can be reinvested in:
- Enhanced on-site biodiversity and carbon offsetting.
 - Increased affordable housing provision.
 - Off-site habitat creation and ecological network improvements.



- 2.8 These refinements are proportionate and maintain the integrity of environmental safeguards.
- 2.9 Eliminating Policy H2 (and making consequential amends to other policies such as DEN1 which currently reference 2030) would allow Winchester to respond more flexibly to any future uplift in housing targets. It avoids the delays inherent in deferred greenfield release and ensures sufficient supply headroom to meet evolving policy expectations. A more dynamic, market-responsive approach would better align with both housing demand and environmental objectives.
- 2.10 In conclusion the deletion of Strategic Policy H2 would:
- 1 Deliver a measurable and immediate uplift in housing supply across multiple start-date scenarios.
 - 2 Accelerate infrastructure funding and delivery in step with growth.
 - 3 Catalyse innovation in nutrient mitigation by removing restrictive gating mechanisms.
 - 4 Simplify the policy framework, enhancing certainty and reducing appeal risk.
 - 5 Enable a rapid and responsive approach to rising national housing targets.
- 2.11 We respectfully recommend that the Inspector supports the removal of Policy H2 to ensure a more effective, flexible, and sustainable Local Plan.

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