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Ms R Barrett
C/O Jill Taylor, Programme Officer
Winchester City Council Offices,
Colebrook Street,
Winchester,
Hampshire,
SO23 9L

23 July 2025

BY EMAIL

Dear Ms R Barrett,

WINCHESTER DISTRICT LOCAL PLAN – COMMENT ON NOTES ED25 AND ED34A AND B

We write to you on behalf of our client, Bewley Homes, to provide comment on Winchester District's ("the Council") notes ED25 and ED34a and b which set out the implications of changing the plan period of the emerging Winchester District Local Plan (2020-2040), specifically in relation to the housing trajectory and provision of a 5-year housing land supply on adoption.

Bewley Homes has interests in Land at Forest Road and Furzeley Road, Denmead and has submitted representations to both the Regulation 18 and Regulation 19 consultations whereby the Local Plan's failure to demonstrate effective cooperation with neighbouring authorities was noted.

Comment on notes ED25 and ED34a and b

We welcome the Council providing evidence on the various scenarios which would unfold as a result of changing the local plan start date in terms of impact on five-year housing land supply. However, we are still of the view that the start date of the local plan should be 2024.

This is evident for the following reasons:

Partnership for South Hampshire (PFSH) unmet needs

Although the Council has noted that their contribution towards Partnership for South Hampshire's (PFSH) unmet needs allowance would be reduced if the start date of the Local Plan is moved forward, we do not think this approach is sound. While the unmet need allowance is additional to the City Council's own housing requirement (as calculated using the standard method), the commitment to deliver 1,900 homes to address PFSH's unmet need has already been agreed through the Statement of Common Ground (SoCG). There is no reason why this need cannot be provided should the local plan start date be revised to 2024. Not according with this would go against paragraph 36 of the National Planning Policy Framework (NPPF) (2024), which requires Local Plans to provide a strategy *which is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so*. In this case, Winchester City Council is capable of meeting the agreements of the SoCG as well as its own needs. Consequently, this does not justify retaining a 2020 Local Plan start date, as the Council should continue to provide for the unmet need regardless of when the plan period begins. If it has not provided this housing by the start of the plan period, then it should all be included as part of the housing target for the remainder of the plan period.

Evidence Base Documents

We acknowledge that the Council began preparing and gathering evidence for the Local Plan on the basis of a 2020 start date. However, the Plan was not submitted until 2024 due to the extended time required for its preparation. This delay should have been accounted for in the overall programme and does not justify the retrospective application of a 2020 start date and it is normal to expect delays in

the Local Plan preparation process. Additionally, adjusting the start date to reflect the actual timing of submission should not require significant changes to the evidence base, in fact we are unaware of any major issues this would cause.

We also understand that Hampshire County Council's 2024 housing completion data was released when the Local Plan was submitted for examination and was therefore not included. Nevertheless, projections or reasonable estimates could have been used in its place. Accordingly, the absence of this data is not a valid reason to prevent the plan period from beginning in 2024.

It appears that the City Council is pursuing a 2020 start date in order to demonstrate that it is meeting its housing requirements, and, as a result, to avoid the need to release green belt land. However, this approach is not consistent with paragraph 61 of the NPPF, which emphasises the importance of ensuring that a sufficient amount and variety of land is available where it is needed, in support of the Government's objective to significantly boost the supply of homes.

While we acknowledge that adjusting the start date may present some administrative challenges, this does not render it unviable. Ensuring that housing needs are met in full and that the Local Plan aligns with national policy must take precedence over administrative convenience.

Summary

We look forward to receiving confirmation of this letter's receipt. In the meantime, should you have any queries, please do not hesitate to contact me either by email [REDACTED] or telephone, [REDACTED]

Yours sincerely,

JAMIE SULLIVAN
DIRECTOR