

Examination of the Winchester District Local Plan 2020-2040 (Taylor Wimpey UK Limited and Vistry Group: ANON-AQTS-3BX4-T - Nexus Planning)

Matter 3: The Plan's vision and strategic policies SP1, SP2, and SP3

Issue 1 – Whether the vision and strategic policies SP1, SP2, and SP3 are positively prepared, justified, effective, and consistent with national policy.

Policy SP1

- 1. The Plan sets out a vision and objectives to tackle climate and nature emergencies and create a greener District, living well, homes for all and a vibrant local economy. Those are given effect through Policy SP1. In so doing would that Plan be effective? Should the Plan objectives be incorporated within the Plan's strategic policies?**

The Council's proposed spatial strategy does not follow the evidence or provide the spatial response that should flow from the wider policy objectives that purport to place the Climate Emergency at the centre of the Plan. There is a fundamental spatial deficit at the heart of the policy framework, which places insufficient emphasis on allocating strategic growth at the principal settlement, where the opportunity to drive behavioural change and to deliver genuinely sustainable growth is greatest.

The objectives infer that tackling the climate emergency informs every aspect of the Local Plan, with fifteen (generic) 'spatial objectives' defined. However, there is a disconnect between the stated intentions and the spatial strategy that is proposed, with no explanation how the objectives have combined to generate the spatial strategy. Across the fifteen objectives there is also a lack of clarity regarding their spatial functionality and no clear explanation of how they have informed the spatial choices that have been made:

Table 1.

Objective	Spatial Characteristics
i) Energy efficiency standards that have been developed by the Low Energy Transformation Initiative (LETI) embedded in policy.	No.
ii) Prioritise brownfield land, make efficient use of available land/high quality design	Yes.
iii) Conserve/enhance valuable environments and improve wildlife assets via BAP	Yes – areas to avoid.
iv) Provide BNG/avoid landscape harm/preserve SDNP	Yes – areas to avoid.
v) Provide/protect blue/green infrastructure	No.
vi) Promote design, lifestyle, and business to reduce carbon emissions, encourage recycling and waste minimisation.	No – not actually clear what this means.
vii) Maximise use of low carbon construction/infrastructure.	No.
viii) Promote health – improve air quality, improve opportunities for walking/cycling access to the environment.	Yes – but no clear explanation of how this has informed/driven spatial choices.

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ix)	Deliver inclusive communities in sustainable neighbourhoods	Yes – access to services and facilities/spatial strategy not fully informed by this objective.
x)	Support active travel/minimise car-borne trips	Yes – has not clearly influenced the spatial strategy.
xi)	Deliver homes to meet all needs.	No.
xii)	Allow the economy to grow, support agricultural and rural sectors	No.
xiii)	Identify sites to meet business needs	Yes – what spatial choices have flowed from this?
xiv)	Support cultural/visitor/tourist economies	Yes
xv)	Support the low carbon economy	No

The spatial strategy is not an obvious product of the objectives, which do not themselves all have the spatially significant characteristics suggested.

Having made clear that tackling the causes of climate change is the main challenge that the Local Plan (and the spatial strategy it proposes) faces it is important to consider whether the spatial strategy will be effective in this context.

The Local Plan is the document that gives spatial expression to the development objectives that the Council intends to pursue within its area of jurisdiction. The Council Plan (2021) states that the Climate Emergency and reducing the carbon footprint of the district are the major challenges that the authority faces, alongside factors including poor air quality, expensive housing costs to buy and rent, an ageing population exacerbated by younger people leaving the district, poor provision of public transport, and safe walking and cycling routes in parts of the district¹.

The Council declared a Climate Emergency and published a Carbon Neutrality Action Plan 2020-2030, which sets out a series of actions to reduce carbon emissions by 2030, to the point where neutrality is achieved. Planning and development are cited as critical factors. The main sources of carbon emissions in Winchester district are identified in a table on p.8 of the document:

Table 2.

Sector	Tonnes CO2	Proportion of Emissions
Transport	492,000	56.0%
Domestic Energy	193,000	22.0%
Commercial Energy	172,000	19.5%
Agricultural/Miscellaneous	24,000	2.5%
Total	881,000	100%

The table shows clearly that transport has by far the greatest local impact on climate change, and is the key determinant that policies set out in the Local Plan, most notably via the spatial strategy, have the capacity to address.

Section 3 of the Carbon Neutrality Action Plan – *Delivery Principles* (p.13) states that tackling the Climate Emergency will be at the heart of everything that the Council does, a priority that will be met by:

- *Effect(ing) an increase in the proportion of journeys taken by walking, cycling, and public transport*

¹ Winchester Council Plan (2021) – The Challenges We Face p.5

- Putting in place an adopted and up to date Local Plan with **positive policies, which promote low carbon development and transport while protecting our heritage and natural environment, including policies designed to secure the development and use of land that contribute to the mitigation of, and adaptation to, climate change**
- Deliver(ing) the City of Winchester Movement Strategy and **prioritise walking, cycling, and public transport throughout the district.** (Nexus emphasis).

The Council Plan recognises the need for policies that reduce emissions associated with transport. A simple interrogation of the data shows that transport, and principally car use, is the single most significant contributor to carbon emissions. Accordingly, for the spatial strategy to be effective it should support measures that significantly reduce emissions from transport, particularly private car use. The most effective way to do this would be via a spatial development strategy that places the greatest quantum of development in the most sustainable locations, where drivers of travel demand are greatest. However, there is no evidence of a joined-up and purposive approach to land-use and transport planning to achieve this outcome.

The Foreword to the 2040 Local Plan asserts that the major new challenges caused by the Climate Emergency demand a significant change to the policy regime set out in the adopted Local Plan. However, the most important element of the new Local Plan – its spatial strategy - fails to respond adequately to the challenges identified, or the priorities that are stated.

The table below shows that far from embarking on a new strategy that redistributes most growth to locations that will support sustainable lifestyles (notably regarding travel demand and proximity to jobs, services and facilities) the proposed strategy ignores the primacy of Winchester Town and assigns a higher proportion of growth to the other areas of the district, notably the southern margins of the district (SHUA). This strategy appears at odds with the stated intentions:

Table 3.

Development Strategy Area	Housing Requirement	Proportion
Winchester District Local Plan Part: Joint Core Strategy (March 2013)		
Winchester Town	4,000	32%
South Hampshire Urban Areas	6,000	48%
Market Towns and Rural Area	2,500	20%
Total	12,500	100%
Winchester District Local Plan 2020-2040		
Winchester Town	5,640	37.3%
South Hampshire Urban Areas	5,650	37.4%
Market Towns and Rural Areas	3,825	25.3%
Total	15,115	100%

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The chosen spatial strategy becomes more difficult to reconcile with reference to section 3.1 of the 2040 Local Plan, which describes the Vision and the three broad geographical areas of the district (carried forward from the adopted Local Plan for the purposes of spatial planning):

Table 4.

Sub Area	Characteristics
Winchester Town (WT)	<ul style="list-style-type: none">• Largest settlement in the district/county town• Important centre for housing/employment• Significant commuting flows• Mismatch of workers and residents• Services and facilities hub• Sustainable location for growth and change
South Hampshire Urban Areas (SHUA)	<ul style="list-style-type: none">• Response to PfSH area• Strong economic/social ties to the south• MDA delivering significant growth• Constrained neighbouring areas
Market Towns and Rural Area (MTRA)	<ul style="list-style-type: none">• Many smaller settlements – villages to small hamlets• Rural nature is a constraint• Opportunities to address local needs

It is abidingly clear from this summary that Winchester, the principal settlement within the district, is an employment and housing hub that experiences significant daily commuting flows into the urban area, and functions in a way consistent with its county town status. It is acknowledged to be the most sustainable location for growth and change in the district and should therefore be the main location for growth because it offers the greatest opportunity to support behavioural change and address the local causes of climate change through the adoption of an effective spatial strategy.

The Local Plan has not taken this course by choosing to be examined under the transitional provisions, therefore avoiding the need to make provision for the much higher levels of growth that will be needed to address the chronic structural issues that have affected the housing market within the district through successive development plan periods. This spatial strategy will not be effective, and it is therefore of critical importance that this plan does not frustrate and delay early consideration of the far more ambitious growth objectives that will apply to Winchester in 2025 via the 2024 NPPF/LHN figures.

Policy SP2

- 1. *Given the transitional arrangements set out in NPPF December 2024 paragraphs 234-236) would a modification requiring a Plan review within a stated timescale be clear and effective? Given the above national policy would such a modification be necessary for soundness?***

Yes. Paragraph 236 of the December 2024 NPPF applies to this Local Plan because the housing requirement (even when making an allowance for contingencies/unmet housing need from adjoining authorities) is only around 65% of the 2024 LHN figure.

The wording of the paragraph is clear (removing any previous ambiguity via the use of phrasing such as 'as soon as possible') the LPA should begin work on a new plan once the relevant LURA provisions are introduced in 2025. The NPPF does not stipulate that this should be deferred until an 'old-style' plan has been adopted. Such a provision would serve to unduly delay the urgent requirement to introduce comprehensive development plan coverage via plans that are 'in-step' with Government policy.

The LPA has proposed a Modification to the 2040 Plan (SD14a – PM2), which states that the NPPF requires the plan to be reviewed ‘as soon as possible after adoption’. As noted above, this is not what the NPPF states. The Council has proposed via PM2 to commit to commence a review of the 2040 Plan within six months of the Plan being adopted. This is an inadequate undertaking in the face of the requirements of the Framework and the scale of the shortfall against 2024 LHN for the district that the Plan proposes to meet (56% of LHN – 13,215/20 = 661 dpa).

It is imperative that a strict timescale is imposed and enforced regarding an immediate review of this Local Plan (if it proceeds to adoption) without which there is a significant risk that a future review process could drift. Should there be any doubt in this regard reference can be made to the current plan review process, culminating in this examination, which began in September 2018. Any risk that a similar protracted plan-making process could be allowed to occur must be removed.

Vistry/Taylor Wimpey proposed an amendment to Policy SP1 within submissions to the R.19 consultation in October 2024 to require an early review of the 2040 Plan:

Strategic Policy SP1 – Reviewing the 2040 Local Plan

The Council is committed to delivering the objectives that underpin the Local Plan and recognises that to achieve this effectively it is vital that the policies and provisions within the development plan are up to date and reflect national objectives for the planning system. The Council will undertake an immediate review of the 2040 Plan upon its adoption, with an updated or replacement version of the Plan submitted for examination not later than 18-months from the adoption date of the 2040 Plan, and in any event no later than the end of December 2026.

If an updated or replacement plan that accords with the provisions of the National Planning Policy Framework (NPPF) is not submitted in accordance with the timetable specified above, the policies in the 2040 Plan that relate to the supply of land for housing will be deemed to be out of date in accordance with the terms of paragraph 11 (d) of the NPPF.

Inspector Bridgwater, examining the Spelthorne Local Plan (hearings in respect of which concluded in February 2025), recommended a Policy (ST3) requiring a partial Local Plan Early Review to address housing and employment policies, which are not aligned with the provisions of the 2024 NPPF. Similar wording could be applied to the 2040 Local Plan, albeit it is relevant to note that the proposed housing requirement within the Spelthorne Local Plan is around 79% of the 2024 LHN figure and therefore far closer to the threshold of acceptability under the transitional provisions.

The revised wording (**Appendix 1**) proposes a review of the Local Plan: ‘immediately following adoption of the Local Plan 2024-2039’, with ‘An updated or replacement plan will be submitted for examination no later than **two** years after the date of adoption the plan.’ Specified.

In the case of Winchester, it may be determined that an expedited review process is justified if the 2040 Plan is found, to rapidly introduce a spatial strategy that can readily be implemented to address the significant housing shortfalls against the 2024 LHN figure that would be a product of the 2040 Local Plan.

Any further delay, predicated on the outcome of local government organisation, should be avoided and a prescribed timescale should be imposed. Failure to adhere to which should invoke the sanction proposed in the R.19 submissions quoted above.

- 2. To accord with national policy at NPPF paragraph 60, to boost significantly the supply of homes, should the numbers expressed in policy SP2 be stated as minimums?**

In view of the significant gap between the number of homes proposed and the 2024 LHN requirement this should be the case.

Policy SP3

- 3. Should the countryside designation afforded by policy SP2 remain on sites allocated for development in the Plan?**

The policy response proposed via policies SP2 and SP3 jointly for allocations that lie currently outside of defined settlement boundaries, explained at paragraph 3.12 of the supporting text, is a curious approach. Taken literally the text infers that the LPA does not know how the allocating policies should be interpreted at this stage. Boundary delimitations are deferred to future reviews of the Local Plan, which suggests that the evidence base informing this document is incomplete. The Local Plan should provide clarity and certainty for decision-makers and should not leave policy making decisions to future plan-making exercises.

When allocating a site, the Local Plan should make clear that the policy anticipates that the land will be developed pursuant to the provisions of the allocating policy, the requirements of which should be clear to those bringing forward planning applications pursuant to the policy. The principle of development on an allocated site will be established by the Local Plan; the form of development that will come forward within the allocation boundary is a matter for the application process, which will be formulated in response to the requirements of policy.

If components of an allocation should be maintained as open space/landscaped buffer, or similar, it will be for the application process to determine such and to ensure that mechanisms are applied via the planning permission to preserve the character of the land.

In the alternative, if there is a clear imperative to ensure that such areas are maintained free from built/urbanising forms of development the land should be excluded from an allocation. The Local Plan should provide certainty for decision-makers and avoid unnecessary ambiguity.

Appendix 1.