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# WINCHESTER DISTRCT LOCAL PLAN EXAMINATION

**Hearing Statement: Matter 3** 

CLIENT: Persimmon South Coast

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## 1 MATTER 2: THE PLAN'S VISION AND STRATEGIC POLICIES SP1, SP2 AND SP3

#### 1.1 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of Persimmon South Coast in response to the examination on the Winchester District Local Plan (WDLP).
- 1.2 Persimmon South Coast controls, inter alia, 'Land East of Station Hill, Curdridge' and is promoting the Site for allocation as part of the WDLP process for c. 250-350 residential units.

ISSUE 1: WHETHER THE VISION AND STRATEGIC POLICIES SP1, SP2 AND SP3 ARE POSITIVELY PREPARED, JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY

General Matters

Qu. 1

Having regard to NPPF 21, does the Plan make clear which policies should be regarded as 'strategic policies' and would they constitute a clear strategy for the pattern, scale and quality of development in the District?

1.2.1 No comment- for the Council to address.

**Q**U.2

What is the justification for the Plan period of 2020 to 2040?

1.2.2 No comment- for the Council to address.

**Policy SP1** 

Qu. 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?

1.2.3 No comment- for the Council to address.

**Policy SP2** 

Qu. 1

1.2.4 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?

- 1.2.5 Yes, a Plan review will be required in line with the requirements of NPPF paragraph 236. This is on the basis that if this Plan is adopted, the housing provisions within the Plan meets less than 80% of the local housing need calculated using the standard method in national planning practice guidance, published on 12 December 2024.
- 1.2.6 The Plan is seeking to provide 15,465 dwellings across the Plan period (2020-40).
- 1.2.7 The December 2024 New Standard method calculation identifies a need for 1,157 dwellings per annum, up from 676 (and increase of 71.7). The Plan only provides c. 67% of the required 2024 housing need provision and accordingly a review will be required immediately.
- 1.2.8 Accordingly, we consider a Policy confirming the need for a review would be justified, and to ensure effectiveness, this should set out clear timeframes for a review.

#### Qu. 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?

- 1.2.9 We note the relevant paragraph is 61, which confirms the Government's objective of significantly boosting the supply of homes.
- 1.2.10 The NPPF, para .11 a), makes clear that for plan-making, all plans should, inter alia, meet the development needs of their area. There is nothing that explicitly requires LPA to set out their needs as minimum targets so in our view it is not unsound that the Strategic Policy SP2 does not express the housing targets as minimum figures.
- 1.2.11 Notwithstanding this, we do consider it would make for a more positive policy if the wording was to include the requirements as minimum figures. Indeed, para. 16 makes clear that Plans should be prepared positively, "in a way that is aspirational but deliverable".
- 1.2.12 As noted above, the District's housing need requirement has increased by c. 70%. Despite this Plan not being required to meet this need to be found sound, against the context of this increased need it would be more positive for the Council to seek to exceed its figures where it can and be positive in its approach at the outset. This will provide a far more positive policy framework for future planning applications to be considered against.

#### **Q**u. 3

Policy SP2 sets out housing targets for the three spatial areas in the District. In so doing, does it provide appropriate support for employment uses to meet local needs?

1.2.13 No comment. For the Council to respond

#### **Policy SP3**

#### Qu. 1

Does the policy strike the right balance between protecting the countryside and promoting development to meet local needs? Should the policy explicitly recognise the sustainability of locations immediately adjacent to existing settlement boundaries or previously developed land?

- 1.2.14 No, we do not consider this policy strikes the right balance, and in our view the policy should seek to facilitate suitable locations to come forward for development over the plan period. This is particularly important given the Council has not defined settlement boundaries for a number of its settlements meaning this policy would be overly restrictive and therefore ineffective.
- 1.2.15 As noted above, Winchester District has seen a significant increase in its housing need figure, and additional housing sites are required. The policy as worded also ignores the potential future requirements of rural communities. It would be positive to provide a framework for sustainable sites outside of development boundaries to be come forward for development, if they meet the criteria as set out in paragraph 89.

#### Qu. 2

Would policy SP3 accord with NPPF paragraph 89, which states that '... The use of previously developed land, and sites that are physically well-related to existing settlements, should be encourage where suitable opportunities exist.'?

1.2.16 No. The Policy does not accord with para. 89. We suggest an additional criteria is included within the Policy that makes provisions for the requirements of para. 89. This would be justified and ensure the plan is positively prepared.

#### **Q**u. 3

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

1.2.17 No comment- for the Council to answer.

#### **Qu. 4**

Does policy SP23 provide for the particular locational needs of essential infrastructure such as water and waste water infrastructure in accordance with PPG? Should it state that development should not increase flood risk and assessed any potential loss of the best and most versatile agricultural land?

1.2.18 No comment- for the Council to answer.

#### Qu. 5

To ensure the policy promotes biodiversity should it align with the Local Nature Recovery Strategy?

1.2.19 No comment. For the Council to answer.