

**Winchester District Local Plan 2020-
2040**

**Examination Statement
Matter 3 - The Plan's vision and
strategic policies SP1, SP2 and SP3**

Prepared by



Prepared on behalf of Croudace Homes Ltd

March 2025

Ref: WIN-2015-AD

Southern Planning Practice Ltd

Registered Office: Youngs Yard, Churchfields, Twyford, Winchester SO21 1NN
Tel: 01962 715770 E-mail: info@southernplanning.co.uk Website: www.southernplanning.co.uk
Registered in England and Wales No. 3862030

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1.0 Introduction

- 1.1 This statement has been prepared by Southern Planning Practice Ltd on behalf of Croudace Homes Ltd who has an interest on Land at Southwick Road, Wickham which is allocated under Policy WK6 of the submission version of the Local Plan, as well as adjoining land. Croudace is also promoting SHELAA Site CC03 and CC03b, Land East of Highbridge Road, Colden Common.
- 1.2 It is pertinent to note that representations have been made on behalf of our client, Croudace Homes Ltd, throughout the preparation of the emerging Local Plan to seek to promote the sites and its suitability for residential development. Whilst this statement is not a duplication of the contents of representations previously submitted to the emerging Local Plan, this statement draws on previous responses where necessary.
- 1.3 Careful consideration has been given to the Inspectors' Matters, Issues and Questions on the relevant published examination material available on Winchester City Council's examination webpage, all of which has informed the preparation of this statement.
- 1.4 This Examination Statement is prepared in response to the Inspectors' Matters, Issues and Questions – Matter 3 - The Plan's vision and strategic policies SP1, SP2 and SP3.
- 1.5 In addition to this Examination Statement, several other statements have been prepared in response to other matters being heard in the Local Plan Examination; where there is cross over between these matters we have sought to cross refer rather than repeat comments previously made.
- 1.6 This statement focuses on the overall development strategy proposed in the Local Plan and therefore primarily responds to questions relating to policies SP1, SP2 and SP3 of the Inspectors' Matters, Issues and Questions set out under Matter 3.
- 1.7 This statement should be read alongside our Regulation 19 representation as well as the separate hearing statements submitted on behalf of Croudace Homes.

2.0 [Response to Inspectors' Questions](#)

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?***

- 2.1 We largely support the vision and objectives for Winchester District over the plan period as set out in our Regulation 19 representations.
- 2.2 The objectives to tackle climate and nature emergencies and create a greener district are supported by Croudace Homes and it is considered that providing these objectives are integrated in a pragmatic, and not overly onerous way, then they could be incorporated within the Plan's strategic policies. However, it is noted that these considerations are already given effect through Policy SP1 and as such, it is not essential for the Plan to be effective to incorporate these objectives within the strategic policies of the Local Plan also.

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?***

- 2.3 Whilst the provisions for the transitional arrangements set out in Paragraphs 234-236 of the NPPF are noted, it is considered that it would be pragmatic and in the interests of good plan-making to make a modification to the Local Plan requiring an early plan review to be undertaken. Such a review would ensure that the Council has a robust supply of deliverable to ensure a sufficient housing land supply is maintained. Further, it is noted that the Home Builders Federation (HBF) often refers to the approach taken in Bedford where its Local Plan

includes a review policy. We would therefore suggest a policy similar to that adopted in the Bedford Local Plan 2030, which was examined under the transition arrangements in the 2019 NPPF. This policy required the Council to submit a new plan within three years of adopting the local plan 2030 and in the event that this submission date is not adhered to, the policies in the local plan which are most important for determining planning applications for new dwellings will be deemed to be ‘out of date’.

2.4 The Council has already taken the unusual step of indicating that work on a plan review will commence in advance of the adoption of the Plan currently at Examination. The Local Development Scheme (LDS) was approved by cabinet on 12 February 2025. The LDS sets out the following timescales for the current Local Plan and a future Local Plan review:

- Examination of the current Local Plan Q1 (April – June) 2025
- TBC - Consultation on the Proposed Modifications to the Local Plan - end of Q1 (April – June) / Q2 (June – September) 2025
- Commence work on a review of the next Local Plan Q2 (July – September) 2025
- Adoption of the current Local Plan Q3 (October – December) 2025
- 1st public consultation on the review of the Local Plan Q2 (July – September) 2026
- 2nd public consultation on the review of the Local Plan Q3 (October – December) 2027
- Examination of the Local Plan Q4 (January – March) 2028
- Adoption of the Local Plan Q4 (January – March) 2028 – assuming that there is no delay in the secondary legislation being published in the Levelling Up and Regeneration Act

2.5 The Council has therefore indicated that they will undertake an early Local Plan review with work commencing in around 5-7 months’ time ahead of the adoption of the Local Plan subject of this examination. Whilst this may not be considered to ‘best practice’ for plan-making, it is considered that the Inspector should seek to make a modification to the Plan to ensure that a review of the Plan is undertaken within this timeframe agreed in the LDS to ensure it is adhered to.

2.6 Further, given the recent changes to the National Planning Policy Framework (NPPF) and in particular the standard methodology which has significantly increased the housing requirement for Winchester district. In addition, the provisions of paragraph 78 c) and the requirement to provide a 20% buffer on the housing land supply from 1 July 2026 where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of the NPPF must be considered. Therefore, a modification to require a Plan review to take place within the timescale set out in the LDS would be necessary to ensure the Plan is found sound.

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 minimum?

2.7 As highlighted in our previous representations to the Regulation 19 Local Plan, we believe that the Council should have indicated that the housing figure set out in Policy SP2 is a **minimum** (our emphasis) number of homes to be delivered over the plan period as required by the current standard method set out in the NPPF. We therefore encourage this policy to be modified to set out that the housing number defined in the Local Plan, as calculated by the standard method, is a minimum and seeks to ensure that the Plan is allocating a sufficient number, and variety, of sites to ensure the Local Plan supports the Government's objectives of significantly boosting the supply of homes as set out in paragraph 60. Paragraph 16 b) of the NPPF sets out that plans should be positively prepared in a way that is aspirational but deliverable.

2.8 As per paragraph 60 of the NPPF, the outcome of the standard method is an advisory starting point for establishing a housing requirement for an area.

2.9 Further, as per the planning practice guidance (PPG), *Paragraph: 001 Reference ID: 68-001-20240205*, the standard method for calculating local housing needed provides a **minimum** (our emphasis) number of homes to be planned for in the plan period. This section of the PPG clearly sets out the authorities should use the standard method as a **starting point** (our emphasis) when preparing the housing requirement for their plan unless exceptional circumstances justify an alternative approach. We do not believe there are any exceptional

circumstances which would justify an alternative approach in Winchester district. As such, the Local Plan should be preparing to deliver the housing numbers calculated by the standard method as an absolute minimum to ensure it is ‘positively prepared’ in accordance with paragraph 35 a) of the NPPF which states:

Plans are ‘sound’ if they are:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

2.10 Further, whilst Croudace is supportive of the provision of 1,900 dwellings for an unmet need allowance from neighbouring authorities, this should also be regarded as the absolute minimum, and not a maximum figure, and certainly not a figure that addresses all unmet need from all neighbouring authorities.

2.11 In light of the Local Plan not indicating its housing requirement to be a minimum, in accordance with the standard method set out in the NPPF, it is considered that the Local Plan is not ambitious enough to achieve the Government’s housing targets. As such, a modification should be made to Policy SP2 to ensure the housing figure is a minimum number of homes required over the plan period. Such an amendment would ensure that the Plan is consistent with the NPPF and therefore would be positively prepared in accordance with Paragraph 60 of the NPPF. Please refer to Matter Statement 4 prepared by Neame Sutton Ltd on behalf of Croudace Homes which provides further detail on the housing requirement of Winchester District.

Policy SP3

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?

2.12 Whilst the policy is seeking to protect the countryside from inappropriate development which could potentially impact the district's landscape, it is considered that the policy is not positively worded to seek to meet local housing needs for local people in the district.

2.13 Given the Government's aspirations to significantly boost housing land supply, it is considered that Policy SP3 should recognise that sustainable locations are sometimes immediately adjacent to, and not just within settlement boundaries. Therefore, Policy SP3 should not restrict all new development to within settlement boundaries, and if there are sustainable sites adjacent to existing boundaries these sites should be considered for new residential development.

2.14 We encourage the Council to allow settlements which are sustainable to deliver appropriate growth as opposed to 'modest' growth otherwise it is considered that growth and in particular new residential development will be limited and not ambitious, as required by the NPPF.

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

2.15 It would not be reasonable to keep the countryside designation afforded by Policy SP2 to apply to sites allocated for new development in the Plan. If such countryside designations were to apply to the allocated sites it is considered that this would present a constraint to development which would delay their delivery and therefore have an impact on the housing land supply of Winchester. It is pertinent to note that for most of the allocated sites, it is proposed to amend the settlement boundaries to include them within the defined settlement.