WINCHESTER CITY COUNCIL LOCAL PLAN EXAMINATION - STAGE 1 HEARINGS

MATTER 3: THE PLAN'S VISION AND STRATEGIC POLICIES SP1, SP2 AND SP3

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REPORT CONTROL

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1.0 INTRODUCTION

- 1.1 On behalf of Barwood Land, Grass Roots Planning have been instructed to make representations to the emerging Local Plan (LP) for Winchester City Council (WCC) in which we have also sought to promote a site for housing allocation, referred to as Land north of Cranbourne Drive, Otterbourne. Our involvement in this site stretches back to autumn 2022 when we were commissioned to undertake consultation with the Parish Council (PC) and local community on potential proposals for this site and to make representations to the Council's Reg. 18 LP consultation.
- 1.2 We have set out our representations within the earlier consultation stages to the LP which represent our position on the plan and its constituent parts, however this statement seeks to elaborate on the issues and concerns previously raised and also respond to the Inspector's Matters, Issus and Questions (MIQs) set out in the Inspector Note 2 V2 (ED13).
- 1.3 This statement relates to Matter 3 which refers to the plan's vision and strategic policies SP1, SP2 and SP3, however the comments are focused on Policies SP1 and SP2 as relevant to our previous representations.

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

General Matters

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?

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

Strategic Policies

- 1.4 With the inclusion of Strategic Policies 1, 2 and 3, on first glance the LP does look to be clearly setting out those policies considered to be strategic in line with the Framework. However, as is obvious when reviewing policy H1, there is overlap with other policies which we also consider to be strategic (as setting out the overall distribution of housing across the district).
- 1.5 Reviewing Policy SP1, whilst the overall concept of the policy is supportable, there is no real clarity on how the objectives referred to (but not defined) in the policy will be met. The policy

is therefore considered to be overly ambiguous without providing a clear (yet strategic) approach as to how sustainable development should progress. Indeed, a number of the non-strategic polices (EP8, NA3, PEN1 and HU1) refer back to a need to show how they contribute towards the vision and objective set out in SP1, however these are not (as they should be, especially if referred to in other policies) listed.

- 1.6 Para 21 of the Framework (NPPF 2023) also states those strategic priorities of the area should be distinguished alongside any relevant cross-boundary issues. However, there is no reference to cross boundary planning within the strategic policies. The Council's requirement to meet the unmet need of neighbouring authorities is a key concern which we have set out in response to Matter 1 and one that appears to have been overlooked when stating the strategic priorities which face the district. This is reflective of the current buffer included within the LP to meet neighbouring authorities' unmet need which goes nowhere near appropriately addressing the shortfall we identify under Matter 1.
- 1.7 We do not believe the Strategic Policies in the LP offer a clear strategy for the pattern, scale and quality of development, rather they essentially duplicate the requirements set out in other policies and are missing reference to cross boundary considerations.

Plan Period

- 1.8 As set out in the Framework regarding the LP plan period it is expected that '*strategic policies should look ahead over a minimum 15 year period from adoption*' (para 22) and should be reviewed every 5 years. As set out in para 2.2 of WCC's Housing Topic Paper 2024, work on the new LP started in 2018 which was 5 years on from the adoption of the Core Strategy. This also coincided with the updating of the Framework and the introduction of the Standard Method (SM) for assessing local housing need (LHN). A 20-year plan period was progressed with the intention that this would provide 15 years from plan adoption.
- 1.9 The Housing Topic Paper sets out in para 2.4 that the Reg. 19 LP would be progressed to examination with a revised plan period of April 2020 to March 2040 (amended from 2019 to 2039 under the Reg. 18 LP). With this proposed plan period (if the LP makes it successfully through examination) once adopted it will be over 5 years since the start of the Plan period already, which really raises the question as to whether this is a proactive forward-thinking plan. The Plan will also only just cover the bare minimum 15 years from adoption (if that). This is clearly not justifiable or a robust proactive approach.
- 1.10 The only reason WCC is taking the Plan period back to April 2020 is to try and take advantage of the overprovision of housing (against the then housing target) that occurred during this period. Again, as we have referred to in our response to Matter 4, this is clearly not a robust

approach, rather one that fails to appropriately consider the current needs and how to address these in the most sustainable manner.

1.11 As we have previously set out, it is considered more appropriate to further extend the plan period, and as raised by several consultees to the Reg. 19 LP, this should be taken forward to a more recent base date (i.e. 2024 – matching the housing completions data available). However, on this point it is also acknowledged that given the circumstances regarding the updated Framework and SM, the plan period is largely a moot point as WCC (if successful at examination) will be required to immediately review the Plan following adoption, as the current housing target falls so significantly below the updated SM housing numbers.

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?

- 1.12 Policy SP1 as drafted lacks clarity and its implementation would be difficult to assess appropriately given this ambiguity. There is also noted duplication across the more detailed policies as raised in relation to the Strategic Policies question.
- 1.13 It is our understanding that the Policies within the Plan should provide detail on how the vision and objectives of the Plan can be met, rather than reiterating these further. It is also difficult to see how Policy SP1 will aid in meeting the vision and objectives of the Plan.
- 1.14 The Strategic Policies of the Plan should be those that clearly set out from a high level how the vision and objectives will be met, i.e. Policy H1. That said we do not believe policy H1 as it is currently drafted sets out the most appropriate strategy to successfully create a greener district providing homes for all and a vibrant economy, as it is felt a greater focus should be aimed towards those smaller yet sustainable rural settlements which can clearly successfully accommodate a higher housing requirement and deal more quickly with the market and affordable housing which is evidently needed now.

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?

- 1.15 As acknowledged, WCC's LP was submitted for examination before 12th March 2025 and therefore (under para 234 b) of the Framework) the transitional arrangements apply, and the Plan will be examined under the 2023 Framework.
- 1.16 We would firstly highlight in relation to this point, whilst it has been agreed the Plan will be examined under the 2023 Framework in line with the transitional arrangements; there remains serious concerns associated with the robustness of the Plan, which we believe are a direct result of seeking to rush through the LP under those arrangements, without appropriately dealing with issues raised through both the Reg 18 and 19 consultations.
- 1.17 As is clearly stated in para 1.1 of the Procedure Guide for Local Plan Examinations (Aug 2024) "The LPA should rigorously assess the plan before it is published under Regulation 19 to ensure that, in their view, it is sound and meets all the necessary legal requirements" "This approach may raise uncomfortable questions but the purpose of preparing a plan is to address all the necessary matters as far as possible, and not to defer them to future updates or rely on the Inspector to deal with them, or to fix deficient plans at examination".
- 1.18 Reviewing the summary of consultation responses to the Reg. 18 LP, it is clear a range of concerns were not robustly addressed prior to progressing to the Reg. 19 Local Plan, despite the significant amount of time the Council took in publishing the responses, circa 18 months following the consultation end.
- 1.19 The Procedure Guide for Local Plan Examinations goes on to advise that the LPA should look to invest time to produce a focused and comprehensive statement of the main issues raised in the Reg. 19 representations to support the examination providing the Inspector with a response to the issues raised so that they understand from the outset any substantial concerns about the Plan's soundness or legal compliance.
- 1.20 Given the time it took for WCC to summarise and publish the consultation responses from the Reg. 18 consultation, it was clear they would be unable to review and compile a summary of the main issues raised through the Reg.19 LP consultation prior to submission for examination (a period of just 33 days). We acknowledge WCC have now submitted documents which summarise and provide some very brief feedback on the representations; this is, however, clearly an afterthought, and not one that provides any confidence the issues raised have been addressed.
- 1.21 Given the Plan has been progressed without addressing the significant shortfall of housing (arising from the updated SM), WCC will be required to start work on a new plan under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025) in order to address the housing shortfall. With this in mind the LP should also

include a policy which refers to the requirement for an immediate review of the LP, and progressing without such a policy is considered unsound.

- 1.22 WCC's updated Local Development Scheme (LDS), does suggest the work on the new LP will begin in 2025 and that it will reach examination stage at some point in 2028. The Risk Assessment Table included in the LDS highlights what might be required if the Plan is found unsound, and the proposed mitigation for this is to develop a sound and reliable technical evidence base and if necessary, go back to an earlier stage, revise the Plan and resubmit.
- 1.23 In line with this point we feel it is clearly evident that there is more than enough evidence to highlight the current evidence base supporting the plan is less than robust; and given the huge increase in the housing requirement set by the 2024 SM, it is still felt the most appropriate approach would be to withdraw the LP, go back to an earlier stage and revise the approach, taking account of the significantly increased LHN. The current Plan is clearly not proactively drafted or indeed based on sound evidence.

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?

- 1.24 As noted, it is clear the LP has been rushed through in order to be examined under the 2023 Framework (and supporting NPPG) and not, therefore, have to take account of the much increased housing need figure facing the authority and its neighbours. It is pertinently clear that to progress this approach which relies on a housing requirement which is so significantly below that evidenced; not only presents a high level of risk that the required homes needed for this area will not be met; but also clearly highlights that the proposed housing numbers expressed in Policy SP2 should be stated as **minimums** and the Policies updated as such.
- 1.25 This is also reflective of para 040 of the NPPG which states that the housing requirement should be the minimum number of homes that a plan seeks to provide during the plan period.

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?

1.26 As set out in our representations, Policy SP2 is too heavily focused on Winchester Town and South Hampshire Urban Areas, rather than providing a greater proportion of housing to those sustainable rural settlements. In turn we believe the lack of focus on these areas fails to appropriately support a range of employment needs and may in turn affect the vitality of those villages going forward. 1.27 Otterbourne has access to several key employment sites (as highlighted within our representations to Reg. 18 and 19 LP consultations) with the village itself hosting a range of day to day services (including school, village hall, public houses etc) despite this, the requirement for the settlement is very small (to reflect past completions) this is clearly not a sustainable approach or one that will most appropriately meet the needs of the local population.

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. 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.'?

- 1.28 In response to question 1, we do believe the LP should more clearly express the sustainability of locations immediately adjacent to existing settlement boundaries as these more often than not provide the most appropriate locations to meet LHN. The LP is clearly delivering insufficient housing to meet the currently evidenced housing requirement and therefore, as noted, the targets should be referred to as minimums and a differentiation made between the appropriateness of housing development taking place outside but adjacent to the settlement boundary, which is clearly far more sustainable than isolated development in the countryside.
- 1.29 As referred to in question 2, we do not believe that as the policy stands, it appropriately encourages sites which are physically well-related to existing settlements where suitable opportunities exist. As such we believe the Plan should be updated to appropriately reflect this national policy position.

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