



Winchester Local Plan Examination: Response to Matter 3

Land at Titchfield Lane, Wickham

Boyer

Prepared on behalf of Cateby Estates plc | March 25

REPORT CONTROL

| | |
|-------------------------------------|---|
| Project: | Winchester Local Plan Examination: Response to Matter 3 |
| Client: | Cateby Estates plc |
| Reference: | 19.1037 |
| Document and revision number | Document No. IMS-F-18, Revision 3 |
| File Origin: | 240919 - Hearing Position Statement - Matter 1.docx |
| Primary Author | ██████████ |
| Checked By: | Click to add initials. |

| Issue | Date | Status | Checked by |
|-------|------|--------|------------|
| 01 | | Draft | ██ |
| | | | |
| | | | |

1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Boyer on behalf of Catesby Estates plc ('Catesby') in response to the Inspector's Stage 1 Matters, Issues, and Questions ('MIQs'), in relation to the examination of the Winchester District Local Plan 2020-2040 ('Local Plan'/ 'the Plan').
- 1.2 Boyer has prepared this statement in response to Matter 3: 'The Plan's vision and strategic policies SP1, SP2 and SP3', as identified in Examination Document ED13 – Matters Issues and Questions – Stage 1.
- 1.3 The Hearing Statement has been prepared with respect to the promotion of Land at Titchfield Lane, Wickham (WI19), over which Catesby holds a specific land interest. Our comments respond only to those questions pertinent to our client's interest.
- 1.4 Boyer submitted representations to the Council's Regulation 19 Consultation on behalf of Catesby.

2. RESPONSE TO MATTER 3

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

General matters

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

- 2.1 Winchester City Council (WCC) published a new 'Housing Topic Paper Update' in January 2025, following the submission of the Local Plan (ED02). This attempts to justify why WCC considers it appropriate to commence the Plan period in 2020.
- 2.2 However, before this updated document is addressed below, it is important to draw attention to the Council's previously stated explanation. This was set out in Paragraph 2.4 of the Housing Topic Paper (2024) (SD10g), which states that this start point serves;

“...to allow some of the Council's recent good performance in terms of housing completions to be taken into account, as there is no specific provision in the NPPF or Planning Practice Guidance for past over-supply to be taken into account and this would otherwise be lost”.
- 2.3 In other words, commencing in 2020 allows the Plan to capture relatively high levels of recent delivery (derived mainly from strategic allocations that have come forward much later than expected) and count this against the housing requirement now identified. This, in turn, allows the Council to propose new allocations for just 2,875 homes at Policy H2 (around 19% of the total requirement).
- 2.4 However, it is notable that the new Government, in publishing the December 2024 NPPF, expressly removed the previous statement in the December 2023 NPPF, which indicated that further guidance on “...the circumstances in which past shortfalls or over-supply can be addressed” would be published via updates to the PPG.
- 2.5 The former Conservative Government did not progress with such an update to the PPG, and the current Government outright deleted references to capturing supposed oversupply in the Framework. As such, there is still no solid policy basis for the alleged 'oversupply' to be accounted for in the way the Council envisages.
- 2.6 Turning to the Housing Topic Paper Update (Jan 2025, ED02), this document attempts to provide a more substantive justification for commencing the Local Plan in 2020. On pages 7 and 8, the Council states that there is no specific guidance in the NPPF or PPG regarding a Plan's start date and argues that it is, therefore, for the planning authority to choose a suitable date.
- 2.7 Following this. at paragraph 3.6 of the ED02, the Council further argues that;

“...2020 also aligns well with the date of key 'needs' studies that form part of the evidence base. The original Strategic Housing Market Assessment (SHMA), Employment

Land Study, Retail Leisure and Town Centre Uses Study, and the Transport Assessment Stage 1 were all published in 2020. While it has been necessary to conduct partial updates of this evidence to maintain its relevance, the 2020 studies informed the Strategic Issues and Priorities (SIP) consultation in 2021 and the subsequent development of the Local Plan”

- 2.8 The Council then proceeds to cite the Examination of the Hart District Local Plan, where the Inspector considered it appropriate to correlate the start of the Plan period with the base date of the SHMA (i.e., 2014).
- 2.9 However, the Hart District Local Plan was examined (under transitional arrangements) against the NPPF 2012. Consequently, the SHMA and the OAHN identified by the examining Inspector were not derived from the Standard Method. Hart’s Local Plan is not comparable to the situation in Winchester, where the submitted Local Plan proposes an LHN established under the auspices of the December 2023 NPPF, the related PPG, and the Standard Method as it operated at that time.
- 2.10 Moreover, it is somewhat incredulous for WCC to argue that the Plan period should align with the 2020 SHMA when the 2024 SHMA Update Final Report (HA01) examines how housing needs (including affordable and specialist needs and housing mix) have changed since the previous 2020 iteration. Indeed, much of the Final Report assesses circumstances in 2024 (as a fixed point in time) or projecting forward from this base year. It seems likely that the Council would have aligned the Plan-period with the 2024 SHMA were it not for the perceived opportunity to artificially claim ‘previous over-supply’
- 2.11 Furthermore, the operation of the Standard Method (as existing per the December 2023 NPPF and the applicable PPG) indirectly accounts for previous over/under-supply through the affordability ratio (PPG 011 Reference ID: 2a-011-20190220). Likewise, including several years of extant housing completions within the Plan period would result in the inclusion of completions that will have (through the mechanics of the December 2023 Standard Method) also fed into the assessment of LHN, which the balance of the Period seeks to address. Put more simply, the Council’s approach blurs the inputs into, and outputs derived from, the Standard Method calculation, thereby conflating housing needs with supply.
- 2.12 Overall, this approach is not positively prepared, justified, effective, or consistent with national policy. In summary, the Plan period should be rebased from 2024, and the Plan’s end point should be extended by a year to ensure it runs for 15-years post-adoption.

Policy SP2

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?

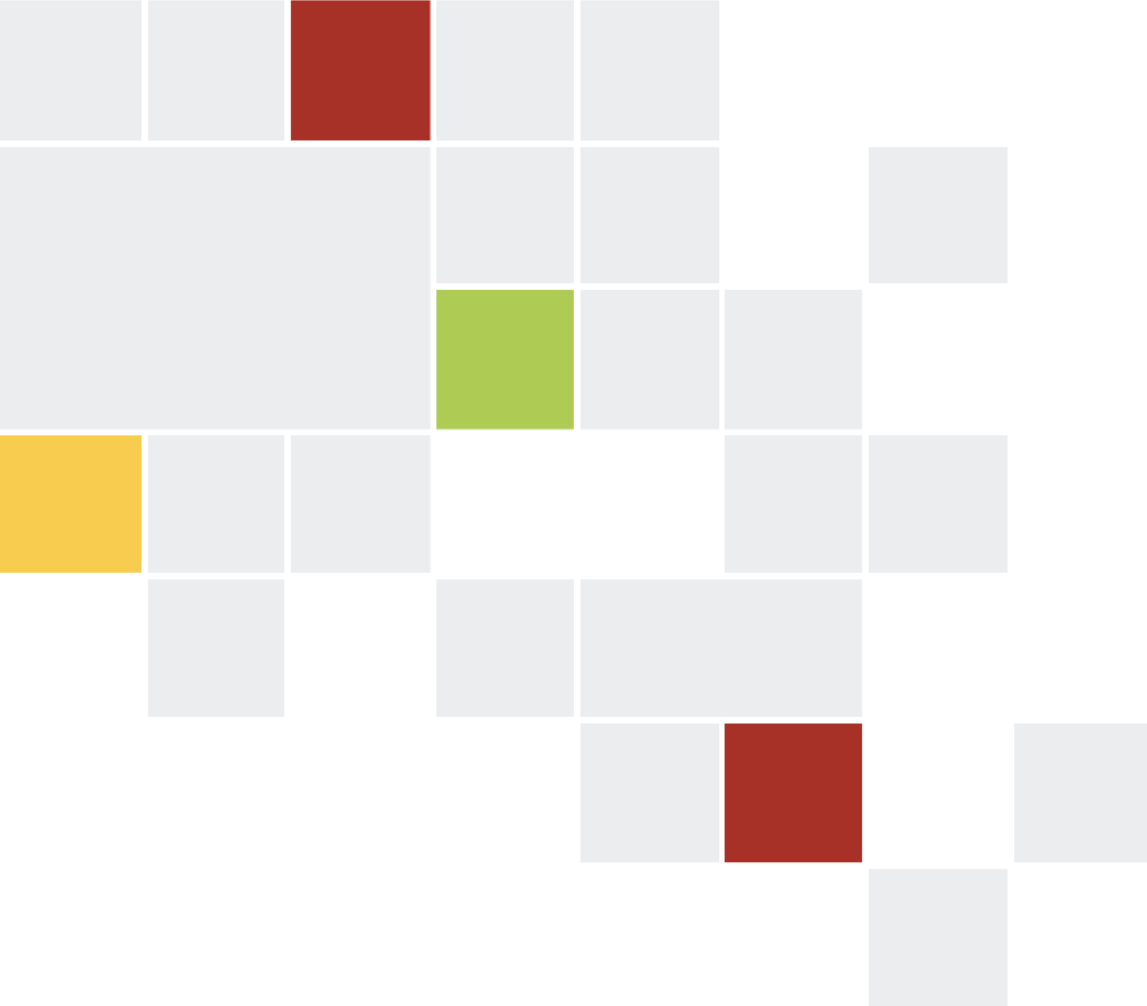
- 2.13 Yes, Catesby considers that a modification must be included to trigger an immediate review of the Plan following adoption. This must include clear timelines and milestones, and stringent penalties must be introduced if the Council fails to progress appropriately.
- 2.14 The Bedford Local Plan 2030 provides a good example of a review mechanism ‘with teeth’, that proved effective in pushing the Council towards the immediate review that was required in that example. This states;

“The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be ‘out of date’ in accordance with paragraph 11 d) of the National Planning Policy Framework 2019”.

- 2.15 A less forceful review mechanism risks being ignored. This is apparent from the example in nearby Eastleigh Borough Council, where the Review of the Local Plan 2016-2036 progresses far more slowly than the Examining Inspector envisaged in their Final Report.
- 2.16 It is noted that the transitional arrangements (in the December 2024 NPPF) would see a 20% buffer applied to five-year housing land supply (5YHLS) calculations from 01 July 2026, as (in the case of Winchester’s submitted Local Plan) the proposed housing requirement is less than 80% of the current (post December 2024) Standard Method LHN figure. Likewise, as para 236 of the December 2024 NPPF indicates, there would be an expectation for Winchester to commence work on a new Local Plan under the revised Plan-making system.
- 2.17 In our view, the threat of a 20% buffer should not be relied upon as a substitute for a very robust Local Plan policy that renders the Plan’s strategic policies out-of-date if Plan-making stalls. Indeed, this is particularly important, given that Local Government reorganisation in Hampshire has the potential to undermine Plan-making, as it has done (for example) in Buckinghamshire.

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?

- 2.18 Yes, they should be expressed as minimums.



Crowthorne House, Nine Mile Ride, Wokingham, RG40 3GZ | 01344 753 220
wokingham@boyerplanning.co.uk | boyerplanning.co.uk

Boyer