
Winchester Local Plan

Local Plan Examination

Hearing Statement relating to: Matter 3 – The Plan's
Vision and Strategic Policies (SP1 – SP2 & SP3)

On behalf of: Bloor Homes Limited

Matter 3: The Plan's Vision and Strategic Policies (SP1 – SP2 & SP3)

NB1 All references to the NPPF in this Statement (unless explicitly noted) are to the December 2023 version of the Framework, as paragraph 234 of the latest, December 2024, version of the Framework sets out that: *“For the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply (b) the plan has been submitted for examination under Regulation 22⁸⁴ on or before 12 March 2025”*. However, it should be noted that as per paragraph 231 of the December 2024 version *“The policies in this Framework are material considerations which should be taken into account in dealing with applications from the day of its publication. Plans may also need to be revised to reflect policy changes which this Framework has made”*. As such, prior to and upon adoption of the Plan, the December 2024 version of the Framework will take effect.

Issue 1.1: Whether the Vision and strategic policies SP1, SP2 and SP3 are positively prepared, justified, effective and consistent with national policy.

General matters:

Q.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?

3.1. No comment.

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

3.2. Bloor Homes Limited (referred to hereafter as ‘Bloor’) confirms that all comments made are expansions upon Bloor’s Manor Parks Regulation 19 (R.19) representations.

3.3. Bloor does not consider the Plan period of (1 April) 2020 to (31 March) 2040 is justified as (a) the plan should be forward looking and (b) the plan period should have a 15-year period from adoption. These points are expanded upon below.

Forward Looking Plan Period

3.4. As above, the draft Local Plan (submission document: SD01) has a period starting in 2020. Bloor disputes the inclusion of a 5-year period before the point of adoption as the purpose of a Local Plan is to manage future development in the district. The Council’s reason for this is set out in paragraph 2.3 of Housing Topic Paper (dated January 2025) (SD10g) confirming that this is expressly to include high levels of recent delivery (4,170 dwellings vs standard method (SM) need of 3,024 dwellings for the period) be included in

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Hearing Statement, Matter 3: The Plan's Vision and Strategic Policies



this Local Plan to mask the actual quantum of growth being delivered as drafted. Paragraph 2.4 goes on to state that this is necessary as the NPPF makes no specific provision for past over supply to be taken into account and the Council does not want this over provision (of 1,146 dwellings) to be “lost”. Bloor disputes that an over provision has been delivered, as explained below.

- 3.5. Work undertaken by Intelligent Land ('IL'), submitted as an Appendix 3 to our Matter 4 Statement identifies that the Council calculates over provision using a combination of completions for the period 2011 to 2016 and projected completions from 2016 to 2018, which amounts to 3,226 dwellings. The SM is then used for the period from 2018 to 2024. The Council, in the AMR (ED03) has measured the past completions against the Local Plan trajectory rather than an average annual requirement for the Plan period.
- 3.6. Table 8 of the submitted IL Appendix demonstrates the scale of over-provision the Council has identified for the adopted Local Plan over the period between 2011 and 2024, and the impact of using this to reduce the housing requirement for the five year period from 2024 using the SM. The Council has also projected this forward for the five year period from 2025. Taking into account past over-provision compared to the adopted Local Plan is not considered to be the correct approach for identifying the housing requirement for the draft Local Plan. If the Council intend to include over provision, as above Bloor express that this should be measured against the annualised housing requirement. Against this measure, table 1 below indicates that a marginal surplus of 32 dwellings would exist.

Table 1: Winchester City Council Annualised Housing Requirements 2011/12 to 2022/23

Monitoring Year	Annualised Housing Need	Compliments	Cumulative Position
2011/12	625	317	(-) 308
2012/13	625	204	(-) 729
2013/14	625	470	(-) 884
2014/15		262	(-) 1,247
2015/16	625	421	(-) 1,451
2016/17	625	555	(-) 1,521
2017/18	625	547	(-) 1,599
2018/19	659	810	(-) 1,448
2019/20	666	636	(-) 1,478
2020/21	692	798	(-) 1,372
2021/22	665	1,141	(-) 896
2022/23	715	1,044	(-) 567
TOTAL	7,772	7,209	(-) 567
+ Communal Accommodation		599	32

- 3.7. Bloor considers the plan period should start from 2024, the year of R.19 consultation when the housing requirement is determined. While Bloor recognises that this would shorten the plan period, the Council's approach fundamentally misunderstands the SM which takes account of past supply through the affordability uplift to determine housing needs moving forward. This is clear from paragraph 2a-005 of the PPG which notes that, when setting the baseline for the SM, the current year is used as the starting point

for calculating growth. This approach was endorsed by Inspector David Reed within paragraph 6 of his post examination hearings letter on the North Norfolk Local Plan Examination date 24 May 2024 (Appendix 2 of our Matter 4 Statement).

- 3.8. If the 2023/NPPF standard method (which we discuss in our Matter 4 Hearing Statement), is used for the plan period of 2024-2040, the Council would have a need of 10,816 dwellings (676 dpa x 16). Having removed the historic completions of 3,170 new homes from the total provision, WCC would have a supply of 12,295 dwellings. While this is clearly sufficient to address its own needs, it is not sufficient to address the manufactured and wholly inadequate unmet need allowance of 1,900 (as per our Matter 4 Hearing Statement) less the 350 dwellings to be provided within the South Downs National Park, which generates a total housing need of 12,366. A shortfall of 71 dwellings would exist.
- 3.9. In the event that it is agreed that the Plan period as proposed (2020-2040) is accepted, Bloor notes there is a fundamental flaw with the Council's calculation of an oversupply of 1,146 dwellings for the period of 2020-2024 which contrives five-year housing land supply calculations (see response to Five Year Housing Land Supply Questions in Matter 4 Hearing Statement) and results in the Local Plan not allocating enough sites to meet minimum housing needs. As such, as set out throughout our Hearing Statements, Bloor considers that a minimum 10% non-implementation contingency should be added to the Plan to allow for flexibility and reserve sites should be identified as a bare minimum, which would be brought forward in the event the Local Plan Review is delayed or annual delivery rates falter.

Fifteen-Year Period from Adoption

- 3.10. The 2023/NPPF states (paragraph 22) (our emphasis added): *"Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. ..."*
- 3.11. It is essential to appreciate the language used in paragraph 22, which expresses the 15-year period as an unambiguous minimum and arguably it should be exceeded where possible.
- 3.12. The February 2025 Local Development Scheme (ED16) confirms that adoption of the emerging Local Plan is anticipated to occur in October-December 2025, before any potential delays to adoption occur. Even in a best case scenario (i.e., adoption before October 2025) it is not possible for the draft Local Plan to look ahead over a minimum 15-year period as the Plan would have needed to be adopted before the end of March 2025.
- 3.13. As such, the draft Local Plan will need to run until 2041 and provide an additional 676 dwellings (NPPF/2023 SM) as an absolute minimum. This approach has been made clear by the Inspectors examining the draft Wiltshire Local Plan.

“The revised spatial strategy topic paper (SD/16) shows the Plan period of 2020-2038 commencing in advance of the date of the most up-to-date calculation of Local Housing Need. In that regard, the plan period would look forward around 13 years from the current date which the Council seeks to justify as being 15 years from the date of the assessments of housing and employment needs. However, paragraph 22 of the Framework (September 2023) expects strategic policies to look ahead over a minimum of 15 years following adoption of the Plan. As a result, the submitted Plan would not appear to look sufficiently far ahead to anticipate and respond to long-term requirements and opportunities.

We identify this matter to you at this early stage as it is clearly a matter of concern and one which will have implications for the rest of the examination, including our consideration of whether the Plan is positively prepared and consistent with national policy with respect to the overall amount of housing and employment land to be identified” [our emphasis added].

- 3.14. The above is considered to be of particular relevance, given it was published after the letter from Matthew Pennycook to the Planning Inspectorate on 30 Jul 2024 which requires pragmatism to only be used where it is likely a plan is capable of being found sound with limited additional work to address soundness issues.
- 3.15. The Council's evidence base (including the SA/IIA (SD02a-d)) has not assessed delivering a higher level of housing. As such, the evidence base would need to be updated which would cause significant delays to examination. Alternatively, the Council could subtract this provision from its 1,900 unmet need allowance allocated to Havant and Portsmouth, however this would further amplify its Duty to Cooperate failings as per section 33A of the 2004 Act. Either approach to rectify this mistake would leave the draft Local Plan unsound.

Policy SP1:

Q.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?

- 3.16. Bloor supports the overall vision set out within the draft Local Plan. The objectives following the vision include (i) Tackling the climate and nature emergencies and creating a greener district, (ii) Living well, (iii) Homes for all, and (iv) Vibrant local economy. Bloor considers that objectives (i), (ii) and (iv) are properly addressed within the vision, however greater emphasis to the importance of delivering new homes (including affordable homes) is required, as opposed to simply referencing “the needs of the area”. The challenge of affordability is evidenced in the Leader's Foreword of the draft Local Plan and at paragraph 9.36 which sets out “The affordability of housing in Winchester district continues to be a major issue and therefore the delivery of affordable homes remains a critical priority of the new Local Plan”. Furthermore,

while Bloor supports the vision and objectives as set out in Strategic Policy SP1 (vision and objectives), it is not considered that the draft Local Plan will deliver these ambitions, meaning the plan cannot be deemed sound.

Policy SP2:

Q.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?

- 3.17. The impact of the 2024/NPPF will be tempered by the transitional arrangements set out in Annex 1. Savills Research confirms that, while over 75% of LPAs will eventually have to adopt a higher housing requirement than they currently have in place, it will take at least five years for local plan targets to exceed the government's aspiration of 1.5 million homes within the parliament.
- 3.18. Where a LPA has an up to date local plan, the new proposed method will not apply straight away for decision making, but it will for the preparation of a new plan, once the current one is out of date. There are currently 84 LPAs (28%) in this position. Around a quarter will become out of date in 2025, but by 2028 there will still be at least 30 LPAs with up to date plans that use housing targets derived from the previous SM. This has knock-on implications for the number of sites these LPAs will have to identify in their 5-year housing land supply, and the standard that they will be held to in the Housing Delivery Test.
- 3.19. These varied provisions for transitions mean that Savills Research expects the combined total of local plan annual targets will remain around 250,000-260,000 homes until 2027, and to only exceed the delivery of 300,000 from the end of 2029¹ by which point to meet the 1.5 million homes target delivery would be required to exceed 400,000 per annum.
- 3.20. While Bloor recognise the transitional arrangements set out in NPPF/2024 Annex 1 and the governments allowance for Plan reviews, there is no legal or policy mechanism to ensure this occurs. The draft Local Plan seeks to artificially suppress delivery, by approximately 400 dpa below previous delivery (2021/22 – 2022/23) and approximately 500 dpa below the current identified minimum local housing need, which the market is clearly capable of absorbing, and as such cannot be deemed sound as it is in direct contradiction to the requirement to plan positively for growth and seek to significantly boost the supply of homes (as per paragraph 61 of the 2024/NPPF) in the height of the housing crisis. As set out within our Matter 1 Statement, at the Warrick District Council EiP in 2015 Inspector K Ward confirmed that an unsound plan cannot be

¹<https://www.savills.co.uk/blog/article/370757/residential-property/what-the-transition-arrangements-for-local-plans-mean-for-housing-delivery.aspx>

made sound via a review. Therefore the only way to ensure adequate delivery in the near future is to find this plan unsound and for the Council to start again under the 2024/NPPF.

- 3.21. While the Council will argue it is better to have an up-to-date Plan in place, Bloor do not consider this to be correct, as the draft Local Plan only plans for 2,875 dwellings of the 15,465 dwelling total District housing need (c. 18%) on new allocations (see Matter 4 Statement).

Q.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?

- 3.22. **Yes.** Bloor considers that numbers stated should be expressed as minimums, however as per our Matter 4 Hearing Statement, we dispute the numbers currently noted and consider that the Council, due to the affordability crisis, sub-regional unmet need and negative trajectory planning, should be planning for a quantum of development significantly above the 2023/NPPF SM, in line with the 2024/NPPF SM. As set out above in paragraph 3.10 Bloor consider that a minimum 10% non-implementation contingency should be added to the Plan to allow for flexibility and reserve sites identified (in the event the Local Plan Review is delayed or annual delivery rates falter).

Q.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?

- 3.23. No comment.

Policy SP3:

Q.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;

- 3.24. **No.** Bloor does not consider that policy SP3 'Development in the countryside' strikes the correct balance between protecting the countryside and promoting development to meet local needs, this is due to the fact that the Council is suppressing housing delivery in the height of a housing crisis (see Matter 4 Hearing Statement).
- 3.25. Bloor agrees with the statement made by the Inspectors in Q.1 above that the policy should explicitly recognise the sustainability of locations immediately adjacent to existing settlement boundaries. This is considered to be of particular importance in regard to sites adjacent to the Tier 1 settlement of Winchester Town.

Q.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.'?

3.26. No comment.

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

3.27. No comment.

Q.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 ?

3.28. No comment.

Q.5. To ensure the policy promotes biodiversity should it align with the Local Nature Recovery Strategy?

3.29. No comment.