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# **EXAMINATION OF THE WINCHESTER DISTRICT LOCAL PLAN 2020-2040**

## **MATTER 3: THE PLAN'S VISION AND STRATEGIC POLICIES**

**On behalf of Wates Developments Ltd.**

**April 2025**

**Carter Jonas**

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## 1.0 INTRODUCTION

- 1.1 This statement is submitted on behalf of Wates Developments Ltd. ('Wates') in relation to the Examination in Public of Winchester City Council ('the Council') Local Plan 2020-2040 ('the Local Plan'). Carter Jonas LLP is instructed by Wates.
- 1.2 Wates is promoting the development of land on the northern edge of Sutton Scotney ('the site'). The site is identified in the 'Regulation 19' consultation draft of the Local Plan under draft Policy SU01 'Land at Brightlands'
- 1.3 Wates has been supportive of the preparation and principal direction of the key elements of the plan. Wates supports the overall strategy and the aim to provide a stable policy context for developers to help deliver much needed housing across the Local Plan area in a sustainable manner.
- 1.4 Wates made representations in response to the consultations held on the informal (Regulation 18) Plan and the Publication Plan (Regulation 19) consultation on the Local Plan.
- 1.5 In this submission, Wates sets out its responses to Matter 3: The Plan's vision and strategic policies.
- 1.6 This statement should be read in combination with Wates' responses to the Inspector's other Matters, especially with reference to its response to Matter 8.

## 2.0 ISSUE: 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?**

- 2.1 The Local Plan policy titles clearly differentiate which policies the Council regards to be strategic and which it does not.
- 2.2 Notwithstanding the very serious concerns set out in response to Matters 2 and 4, Wates is content that the structure and principle of the strategic policies sets out a clear and sound strategy for the pattern of development.

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

- 2.3 Wates is not clear about the justification for a plan period which starts in 2020 and runs to 2040.
- 2.4 Starting the plan period in the past does not comply with Planning Practice Guidance (PPG) which encourages the use of the Standard Method for calculating housing needs. PPG is clear, and it repeatedly refers to the date of the Local Plan submission as the starting point for the calculation of housing needs, and therefore also for the start of the plan period. The only justification for a plan period which starts in 2020 which can be discerned from the Local Plan, and its evidence, is that there was a period of strong delivery in previous years. While strong delivery is to be lauded, PPG is again clear that past trends are considered in the Standard Method (Reference ID: 2a-011-20241212) and therefore there is no need to consider this matter any further. Past trends should also therefore not be used as an argument to depart from the Standard Method.
- 2.5 Therefore, the Plan period should start in 2024.
- 2.6 The NPPF is also clear at paragraph that:
- Strategic policies should look ahead over a minimum 15 year period from adoption...*
- 2.7 The examination of the Local Plan is due to run into June this year, and there are likely to be modifications that will need to be consulted upon thereafter, and the Council will need to await a final report from the Inspector. It is likely then, that the Local Plan will be adopted in early 2026.
- 2.8 Therefore, the Plan period should end in 2041.

### Policy SP1: Vision and Objectives

**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?**

- 2.9 Wates welcomes the aims of policy SP1, and supports the Council in its vision to deliver high quality sustainable and inclusive development.

- 2.10 Wates is particularly pleased to note the reference to partnership working, which will be key if the overall quantum and scale of growth required by the area is to be achieved, especially because that scale increases under the revised National Planning Policy Framework and as such the partnership working will require some flexibility and pragmatism from all parties.
- 2.11 Moreover, because this Local Plan is being considered under the 'transitional arrangements' of the NPPF this should be acknowledged in the plan vision, and especially in the objectives. The necessity for an early review of the Local Plan must be made clear in the objectives.

## **Policy SP2: Spatial Strategy and Development Principles**

**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?***

- 2.12 Yes. Wates acknowledges that it is set out in national policy that where a plan has been adopted that meets less than 80% of local housing needs, as assessed using latest standard method, the planning authority will be expected to start work on a new plan to address the shortfall in housing need (paragraph 236). However, it is important for the Council to commit itself to such a review and for there to be a specific local monitoring vehicle to ensure that housing needs are met, policies remain up-to-date, and for clarity.
- 2.13 Moreover, Wates notes that paragraph 78(c) of the NPPF will require the Council to include a 20% buffer to its 5-year housing land supply from July 2026. However, given the difference between Local Housing Need (as derived from the new Standard Method) of 1,157 dwellings per annum (dpa) compared to the proposed Local Plan requirement of 756 dpa, which is about 65% of the LHN, a 20% increase is unlikely to be sufficient incentive for the Council to prepare a new local plan that will address this shortfall.
- 2.14 Alternatively, the Council could consider 'reserve' sites or commit to reviewing the development capacity at specific sites, and locations where more development might reasonably be achieved without additional harm (for example, increasing the potential development capacity at Land at Brightlands).
- 2.15 Nevertheless, Wates supports the Council's the principle of the overall spatial strategy – as set out in Matter 2 – and acknowledges that the most sustainable location for new development are likely to be those with the most services and facilities. The spatial strategy also recognises the need to support the more rural parts of the plan area, and the need to strike a balance between the social, economic, and environmental needs of the area.

**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?***

- 2.16 Yes. Notwithstanding that the overall number may also need to be reviewed.

**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?***

- 2.17 No. Wates' view is that there should be greater and more explicit policy support for at least a minimum amount of employment land in each of the spatial areas. There is a risk that the approach set out in Policy SP2 could lead to an imbalance of housing compared to employment provision if there is a specific target for the former, and not the latter.

- 2.18 This appears to be a gap in the policy structure of the plan and would make policy E2 more effective, especially where it somewhat ambiguously states that:

*Appropriate growth and maintenance of existing employment within the key settlements will be supported in accordance with the principles set out in SP2*

- 2.19 It is unclear in this case what “appropriate growth” means, and this should be set out at least in minimum in Policy SP2.

### Policy SP3: Development in the Countryside

**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?**

- 2.20 Wates has an overall concern about the scale of support shown in the Local Plan for development in more rural parts of the plan area. As is set out in response to Matter 2, Wates considers that there are several opportunities at the outskirts of market towns and villages which should be more positively embraced in the Local Plan.

- 2.21 Acknowledging sustainable development at the edge of more rural settlements would ensure that the Local Plan is positively worded and complies with the NPPF at paragraph 83:

*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.*

- 2.22 Also, that previously developed land in sustainable locations can provide a good source of development should be included in the Local Plan, so that it demonstrates the general ‘brownfield first’ principle which is inferred in the NPPF 2023 but is explicit in updated government planning policy.

- 2.23 Collectively these changes would comply with paragraph 89, as suggested in the following question.

**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 encouraged where suitable opportunities exist.’?**

- 2.24 As currently drafted policy SP3 is not in conformity with NPPF paragraph 89, however, some relatively simple modifications to the policy which acknowledge the importance of previously developed land, and sites adjacent to settlements, should remedy this matter.

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

- 2.25 No. This is illogical, if a site is designated for development that is an acknowledgement that its character will inevitably change.

**4. Does policy SP3 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?**

2.26 Yes. This would ensure that the policy is in conformity with the NPPF at paragraphs 165 and 187 (b).

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

2.27 The policy can suggest that development proposals should have regard to the Local Nature Recovery Strategy, because it is not a statutory part of the development plan, and this detail should be included to promote biodiversity management, and improvements where possible.

