

WINCHESTER LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor ID: ANON-AQTS-329Q-8

Representor: Bloor Homes Limited

Matter: 3

**The Plan's vision and strategic
policies SP1, SP2 and SP3**

Date: April 2025

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Examination of the Winchester District Local Plan 2020-2040 (the submitted Plan/the Plan)

Hearing Statement

Prepared by tor&co on behalf of Bloor Homes
04 April 2025

Introduction

- 1.1 This examination Hearing Statement has been prepared by tor&co on behalf of Bloor Homes (Representor ID: ANON-AQTS-329Q-8) in respect of **Matter 3 – The Plan’s vision and strategic policies SP1, SP2 and SP3** of the Winchester Local Plan examination in public.
- 1.2 The comments made within this Statement respond directly to the questions set out in the Planning Inspectors Stage 1 Matters, Issues and Questions (ID13), and are presented in the context of the ongoing promotion of Land at Mill Lane, Wickham (Draft Policy WK5 and SHLAA ref. WI02 and WI06).
- 1.3 This Statement should be read in conjunction with the Bloor Homes Regulation 19 representations and Stage 2 Hearing Statements.

Matter 3: The Plan’s vision and strategic policies SP1, SP2 and SP3

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?***

The Plan does not fully meet the requirements of NPPF paragraph 21, which requires plans to make clear which policies should be regarded as 'strategic policies.'

Although the titles of the draft policies generally indicate which ones are strategic, there is no clear supporting text throughout the Plan to explicitly confirm the status of these policies. As a result, it is not entirely clear which policies should be considered strategic, which could lead to confusion in their implementation and interpretation.

Policy SP1, for example, does not qualify as a strategic policy because it primarily outlines the vision and objectives rather than establishing specific development requirements. In contrast, Policy SP2 can be regarded as a strategic policy because it defines the pattern and scale of development by assigning housing numbers to different areas. Further comments in relation to Policies SP1, SP2 and SP3 are set out below.

It is considered that the Plan lacks clarity regarding the quality of development. While some strategic policies do address quality-related criteria, these considerations are

also dispersed across non-strategic policies. This lack of clear distinction between strategic and non-strategic policies related to quality adds to the confusion and reduces the effectiveness of the Plan.

To fully comply with NPPF paragraph 21, the Plan should clearly identify strategic policies in a dedicated section. A more structured and explicit approach to differentiating strategic policies from non-strategic ones would enhance the clarity, coherence, and overall effectiveness of the Plan.

Therefore, as it currently stands, the Plan does not provide a sufficiently 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?

Bloor Homes considers that it is entirely unjustified to set the plan period at 2020 for the sole purpose of securing 'over-supply' from the last four years. This precedes the submission of the local plan for examination by four years.

According to the Housing Topic Paper (paragraph 2.3), the Council justifies this approach by aiming to incorporate high levels of recent housing delivery into the local plan. Additionally, paragraph 2.4 of the Housing Topic Paper suggests that this approach is necessary because the NPPF makes no specific provision for past over supply to be taken into account. The Council is concerned about this oversupply becoming "lost" in the planning process.

However, this approach fundamentally misinterprets the standard method, which incorporates past supply via an affordability uplift to determine future housing needs. Furthermore, the use of 2020 as the start date for the plan is not the correct approach to use. This is clear from paragraph 2a-005 of the PPG which notes that, when setting the baseline for the standard method, the current year is used as the starting point for calculating growth.

Paragraph 22 of the NPPF (2023), explicitly requires that that local plans look ahead for a minimum of 15 years from the point of adoption. If the plan is found sound it is likely it is not likely to be adopted before March 2026 and the current proposed plan period would fall short by one year of meeting the 15-year minimum requirement specified in the NPPF. The latest 'interim' Local Development Scheme provides for the adoption of the local plan in Q3 2025, assuming there are no delays to adoption. To ensure a 15 year period from adoption, the local plan would have had to be adopted before the end of March 2025, which is clearly not possible. Revising the plan period has implications for housing requirements, with additional housing needing to be identified to ensure that an appropriate level of supply is planned for, supporting evidence for which would need to be prepared.

The approach to the plan period identified above 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 1) and also by the Inspectors examining the draft Wiltshire Local Plan (Appendix 2).

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?

Bloor Homes support in principle the approach set out in Policy SP1, particularly the need to deliver the aspirations for each sub-area. However, for these aspirations to be met, the Plan must ensure that housing provision is sufficient to meet both the objectively assessed need for housing and the unmet need from neighbouring areas. This includes not only the development of Winchester Town and the South Hampshire Urban Areas but also the market towns and larger rural settlements, including Wickham. We would also highlight that the revised standard method for calculating housing requirements further increases the need for housing in Winchester.

Policy SP1 currently fails to deliver clarity over the vision to “*address the needs of the area...and respond to the wider relationship with neighbouring areas*”. Instead of a positive and flexible response to this element of the vision, and requirements under the Duty to Cooperate (specifically related to the joint working through the PfSH), the plan represents a restrained approach to housing provision and delivery. Indeed, the ‘objectives’ make no reference to delivering homes (including affordable homes) to accommodate the unmet needs of neighbouring areas, with a reference only to meeting ‘local needs’ under objective iv.

Moreover, we would suggest that the Vision and Objectives should be inserted within the Strategic Policy SP1 itself in a succinct form. Presently the policy cross references to supporting text which is not a statutory part of a plan and has a purpose for setting the context and justification for a policy.

In addition, whilst it is important for the plan to have ambition it is necessary that the vision and objectives are practical, affordable and feasible and therefore the theme of deliverability should also be an emphasis of this overarching policy.

The plan Vision recognises the need for all three parts of the district, to play their part. Alongside growth in Winchester Town and the South Hampshire Urban Area, market towns and large villages also need growth to remain viable, respond to local needs and to be sustainable in the future. Appropriate growth needs to be directed to these settlements to ensure the Vision can be achieved. The plan, as currently drafted does not allocate sufficient housing at settlements such as Wickham, a Larger Rural Settlement, to support their sustainability.

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?***

Paragraph 236 of the NPPF (2024) stipulates that if an adopted plan addresses less than 80% of local housing needs, as assessed using latest standard method, the planning authority is required to begin work on a new plan to address the housing shortfall. Given the significant increase in housing need arising from the new standard method (to 1,157 per annum) it is imperative that the Council moves quickly to review the plan.

On this basis we consider a committed timescale should be included within the plan to ensure that the significantly greater housing needs arising from the revised standard method are met going forwards.

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?

Yes, numbers expressed in policy SP2 should be stated as minimums. Whilst it is noted that the policy wording as currently drafted states 'for about' to suggest these are not fixed targets, it is considered that the policy wording should be clearer, i.e., that these are minimum targets.

NPPF paragraph 11 states that '*plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.*' whilst the NPPG is clear that the standard methodology set out within it provides a "minimum" figure of housing need (ID: 2a-002-20190220). It is a "starting point" (ID: 2a- 010-20201216). This particularly applies in respect of the need to contribute to addressing the (growing) unmet need within the Partnership for South Hampshire area, as part of the Duty to Cooperate.

Consequently, to ensure that the draft plan is flexible and positively prepared to cover the whole of the plan period, the realistic need for homes above these targets should be acknowledged within the policy wording. The wording of i, ii and iii amended to read '*at least XX new homes*'.

Winchester City Council should consider providing additional development, beyond that set out in the emerging plan, during the plan period to meet the unmet needs of neighbouring authorities and any non-delivery on allocated sites.

Having established that there is a need to increase the current housing provision, there is a range of large and smaller sites across the three spatial areas, with potential to provide additional growth, for example Land at Mill Lane, Wickham.

The key to a successful plan is to ensure that each area achieves a level of growth that enables their economies to grow and not stagnate, ensures that services and facilities can continue to be provided so that the sustainability credentials of both higher and lower tier settlements can be maintained and enhanced.

Furthermore, there is a chronic affordability challenge within the district, as set out in the SHMA (July 2024). Relying on existing allocations will not be sufficient and will further compound the district's affordability pressures. There is therefore a need for additional housing to be brought forward.