



# Winchester Local Plan Examination: Response to Matter 3

Fairthorne Grange Farm and Brindle Farm, Botley Road, Whiteley

**Boyer**

Prepared on behalf of Vistry Homes Ltd | April 25

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**REPORT CONTROL**

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## **1. INTRODUCTION**

- 1.1 This Hearing Statement has been prepared by Boyer on behalf of Vistry Homes Ltd ('Vistry'), 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').
- 1.2 Boyer has prepared this statement in response to Matter 3: 'The Plan's vision and strategic policies SP1, SP2 and SP3'.
- 1.3 This Hearing Statement has been prepared in respect to the promotion of Fairthorne Grange Farm and Brindle Farm, Botley Road, Whiteley. The comments in the Hearing Statement relate only to those questions which are pertinent to Vistry's interest.
- 1.4 Representations were submitted by Vistry Homes Ltd to the Regulation 19 Consultation on behalf of Vistry.

## 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

#### 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 strategic policies fail to provide a robust strategy to ensure sufficient development for the Plan Period. As will be set out in this Statement, the Plan fails to act proactively to allocate new sites, relying on extant planning permissions and previously allocated sites. The Plan also fails to make provision for the uplift in housing numbers in the 2024 Standard Method.

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

- 2.2 The original justification was set out in the Housing Topic Paper (2024). Paragraph 2.4 stated the Plan Period start date is set at 2020 *"...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 These completions taken into account in the supply significantly reduces the need to allocate new sites. In other words, the Local Plan seeks to allocate sufficient homes to meet future supply, whilst relying on historic completions. This is demonstrated in the trajectory in the Housing Topic Paper Update (2025) which shows reduced completions towards the end of the Plan Period.
- 2.4 The revised NPPF removed any potential for offsetting over-supply. Whilst the PPG does note that over-supply can be taken into account, it is in reference to calculating housing land supply rather than Plan-making. As such, there is still no basis in policy for the supposed 'over-supply' to be accounted for in the way the Council envisages.
- 2.5 The Housing Topic Paper Update 2025 provided an explanation for commencing the Local Plan in 2020, noting that National Policy does not provide specific guidance on the start date and as such it is up to the Local Authority. The Council also comment that 2020 aligns with key 'needs' studies of their evidence base and use Hart District Council's Local Plan Examination as an example where the Inspector agreed the start date would correlate with the base date of the SHMA.
- 2.6 However, Hart's Local Plan is older, examined against the 2012 NPPF and the Local Housing Need was not derived from the Standard Method. The Examinations are therefore not comparable.

- 2.7 In the case of Winchester, the Standard Method utilises population projections from the relevant base year (in this case, from 2024), alongside housing affordability data (in this case, the median affordability ratio for 2023 which was published in 2024). The Council's proposed approach to the Plan Period is particularly surprising, considering that the most recent evidence-based housing needs assessment is presented in the SHMA Final Report (July 2024). This report examines how housing needs (including affordable and specialist needs and housing mix) have changed since the previous 2020 iteration of the SHMA, with much of the Final Report assessing 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' (as set out in the 2024 Topic Paper).

## 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?**

- 2.8 Proposed Modification (SD14a-PM2) states that the NPPF notes that Local Plans should be reviewed as soon as possible after adoption. However, the NPPF actually requires work to commence on a new Local Plan as soon as the relevant provision under the revised plan-making system (LURA) is published in 2025. It is of fundamental importance that work commences immediately rather than allowing commencement to drift.
- 2.9 A modification must be included to trigger both commencement and completion of an immediate full 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 an appropriate plan within a reasonable timescale. Bedford Borough Council's Local Plan 2030 provides a good example of such a review mechanism.
- 2.10 In the Bedford Local Plan 2030 example, 'Policy 1 – Reviewing the Local Plan 2030' provides that:

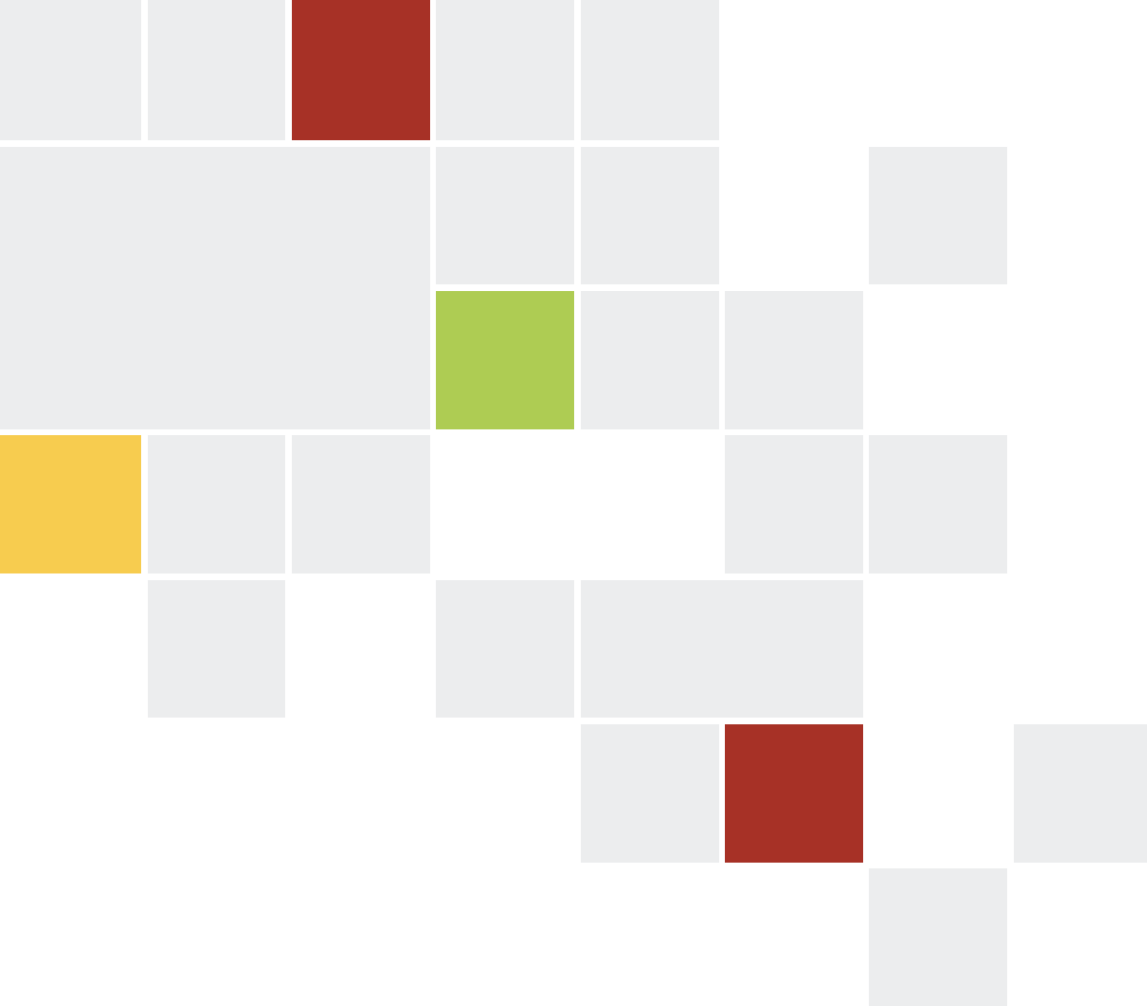
*'The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission 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'.*

- 2.11 This example review policy was included within the Bedford Local Plan 2030 due to similar circumstances, wherein the NPPF (2019) was adopted during the plan-making process, which introduced the Standard Method. The Winchester City Council Local Plan should be amended to introduce a similar review mechanism, if not the requirement to commence an

immediate review (as the per the proposed main modification very recently published in regard to the emerging Spelthorne Local Plan), to ensure the new NPPF and the updated standard method, is taken into account swiftly.

**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?**

- 2.12 Yes, they should be expressed a minimums in keeping with the lexicon and expectations of the NPPF and the NPPG.



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