

Examination of the Winchester District Local Plan 2020 - 2040

Matter 3 Hearing Statement: The Plan's vision and strategic policies SP1, SP2 and SP3

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

On behalf of Foreman Homes Limited and VIVID



MASTER

LAND & PLANNING

General Matters

Q1: 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?

1. It is the position of FHL that policies SP1, SP2 and SP3 do not provide a positively prepared and appropriate strategy having regard to the content of their representations concerning how growth is not planned for within the PfSH area within Winchester District.

Q2: What is the justification for the Plan period of 2020 to 2040?

2. National Policy is clear that policies in Local Plans should look ahead a minimum of 15 years from adoption. It is not considered the Plan Period of 2020-2040 is justified.
3. The District is located within the Partnership for Urban South Hampshire (PfSH) spatial planning area. In December 2023, PfSH published a Spatial Position Statement (SPS) (document ref: PSH01) which sought to help inform the preparation of and strategic co-ordination of local plans. The SPS has been prepared in line with the NPPF to establish and distribute the objectively assessed needs for housing and economic growth. It provides an overall vision and strategic direction for new development up to 2050 and underpins the assessment of the Winchester District Local Plan under NPPF paragraphs 24 to 27.
4. Given the District's ability to contribute significantly towards the demonstrable unmet strategic housing needs of this area (as discussed later in these representations), the plan period should be extended to align with the PfSH Spatial Position Statement December 2023 to 2050.

Policy SP2

Q1: 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?

5. Yes. The proposed housing requirement for the emerging Local Plan of 15,465 dwellings (773dpa) would meet 67% of local housing needs of 1157dpa (calculated using the standard method published 12 December 2024). The consequence is that *"the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need."* This has been recognised within the Housing Topic Paper Update Jan 2025 (document ref: SD02) paragraph 2.6 and 4.20.

6. Moreover, the Government have re-confirmed (on 27th Feb 2025) the intention to accelerate the plan-making process and for planning authorities to deliver on the ambition of local plans that are prepared and adopted in 30 months¹.
7. The Councils Local Development Scheme Feb 25 (document ref: ED16) sets out the expected timescales for production of the Review, which is planned to commence in summer 2025 prior to the adoption of the current local plan and be adopted by March 2028. The timescales are unrealistic. The Local Development Scheme does not consider the potential impacts of the Local Government reorganisation within Hampshire, which may affect the plan-making process.
8. The Councils proposed modification (PM3) to SP2 suggests a time frame to start the review of the Local Plan no later than 6 months after the adoption of the Plan. The NPPF is clear that a review will be expected to begin in the new system as soon as it is brought into force. There is no basis on which to delay this by 6 months. A more pro-active approach should be taken to identify a timescale by which the review process should be completed, i.e. 30 months from adoption of the Plan.

Q2: 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?

9. Yes, all housing figures should be expressed as a minimum.

¹ <https://www.gov.uk/government/consultations/plan-making-reforms-consultation-on-implementation/outcome/government-response-to-the-proposed-plan-making-reforms-consultation-on-implementation#chapter-2-the-new-30-month-plan-timeframe>