

Winchester District Local Plan (2020-2040)

Representations Relating to ED25, ED34a and ED34b On Behalf of Bellway Strategic Land

July 2025

BHLF-AQTS-3289-F

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Author
Daniel Wiseman BSc (Hons) DipTP MRTPI MIoL
Senior Director

Gillings Planning Ltd
2 Wessex Business Park
Colden Common
Winchester
Hampshire
SO21 1WP

[Redacted]
[Redacted]

Client
Bellway Strategic Land

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1.0 Introduction

- 1.1 We are grateful for the opportunity to provide comments on the implications of changing the start date of the Winchester District Local Plan 2020-2040, hereafter referred to as the 'Plan'.
- 1.2 We note that the submitted Plan has a plan period spanning 2020 to 2040. As you know from our written and oral Representations, we consider that the Plan, which effectively looks backwards by five years, looks backwards too much. In looking back so far and carrying forward so many old site allocations it barely looks forwards and will not look forwards for the required 15 years if adopted.
- 1.3 In our view the Plan does not propose enough new site allocations to address the true development needs of the area, and so it is absolutely crucial that the unmet needs of neighbouring authorities are met.
- 1.4 We have made it very clear that, in our opinion, the plan deliberately looks backwards to include past over-delivery of homes to deliberately reduce the amount of new site allocations. This is not positive planning, and the Plan acts more as a 'photograph' and less like a 'plan' in this regard.
- 1.5 We were shocked when we saw the Council's note *entitled "Implications of Changing Local Plan Period to 2022 or 2023"* that was handed out at the EiP on 24th April and later uploaded to the EiP pages as ED25. We were shocked because it shows a fatal flaw in the Council's approach because the Council's approach will reduce the amount of homes provided in the Plan to help meet the unmet needs of neighbouring LPAs, the so-called *"unmet needs allowance"*.
- 1.6 ED25 shows two new scenarios. The first moves the start date to 2022 and the second scenario moves the start date to 2023. The Council were subsequently asked for more clarifications, and a revised note was prepared by the Council, uploaded as ED34b.
- 1.7 ED34b shows three scenarios. The first moves the start date to 2022, the second scenario moves the start date to 2023, and the third scenario moves the start date to 2024. All of these scenarios use the same end date of the Plan, it remains as 2040, as shown in the table overleaf.

Plan Start Date	Unmet Need Allowance (Homes)	Plan End Date	Percentage Change
2020	1,900	2040	
2022	1,099	2040	-42%
2023	714	2040	-62%
2024	290	2040	-84%

- 1.8 The evidence regarding the Duty to Cooperate as set out in the statements of common ground between Winchester City Council (WCC) and their neighbours Havant Borough Council (HBC) and Portsmouth City Council (PCC) shows that both HBC and PCC were expecting 1,900 homes to be provided in the Plan to help meet their unmet housing needs. We won't repeat our arguments that 1,900 is still not enough, but we do wish to comment on the potential lowering of this figure.
- 1.9 It is our opinion that lowering the unmet needs allowance from 1,900 to 1,099 dwellings (a decrease of 42%) does not demonstrate *“effective and on-going joint working”* with its neighbours, which is in our view contrary to the requirements of Paragraph 26 of the National Planning Policy Framework (NPPF).
- 1.10 Lowering the unmet needs allowance even further, to 714 (a 62% decrease) is woeful, and frankly, lowering it down to 290 dwellings (an 84% decrease) begs the question – what even is the point of offering an unmet needs allowance? It would provide a mere fraction of the true unmet needs in the Partnership for South Hampshire (PfSH) area, and we note that PfSH are still completely silent on the housing needs of the PfSH and housing was not on the agenda for their meeting on 14th July 2025.
- 1.11 The last time PfSH discussed housing in a meaningful manner was at their meeting on 6th December 2023 when they published the Spatial Position Statement.
- 1.12 In summary, we are deeply concerned that there is no positive cooperation taking place in the PfSH area at present.
- 1.13 Paragraph 26 of the NPPF is clear, and we are concerned that the unmet needs allowance of 1,900 was a key aspect of the tacet agreement between WCC and HBC, and between WCC and PCC. We are keen to review representations from HBC and PCC.
- 1.14 As Mr Young KC alluded to in his oral representations at the EiP on behalf of Bloor Homes; he opined that Statements of Common Ground are sometimes prepared in a positive manner even when there are in fact concerns so that LPAs can rely on support

from their neighbours in a quid pro quo basis. It is for all parties at an EiP to scrutinise statements of common ground to seek to understand the true feelings of an LPA. We would expect that HBC and PCC would be concerned with a lower 'unmet need allowance' but we are concerned that their statements of common ground may not state this.

- 1.15 We trust that the Plan examination will reach a conclusion that more sites must be allocated to ensure that the Plan can be found sound, and if more sites are not found, we conclude that the Plan is not "positively prepared" or "effective" and does not accord with the provision of Paragraphs 35a and 35c of the Framework.
- 1.16 In our view, the Council must allocate more land for new homes to ensure that 1,900 is an absolute minimum unmet needs allowance because we have no confidence, based on our experience of other Councils such as Eastleigh Borough Council that an "*Early Review*" would conclude within the next four years.