

Land North of Wellhouse Lane Winchester

Representations on the Winchester District
Local Plan Regulation 19 Consultation

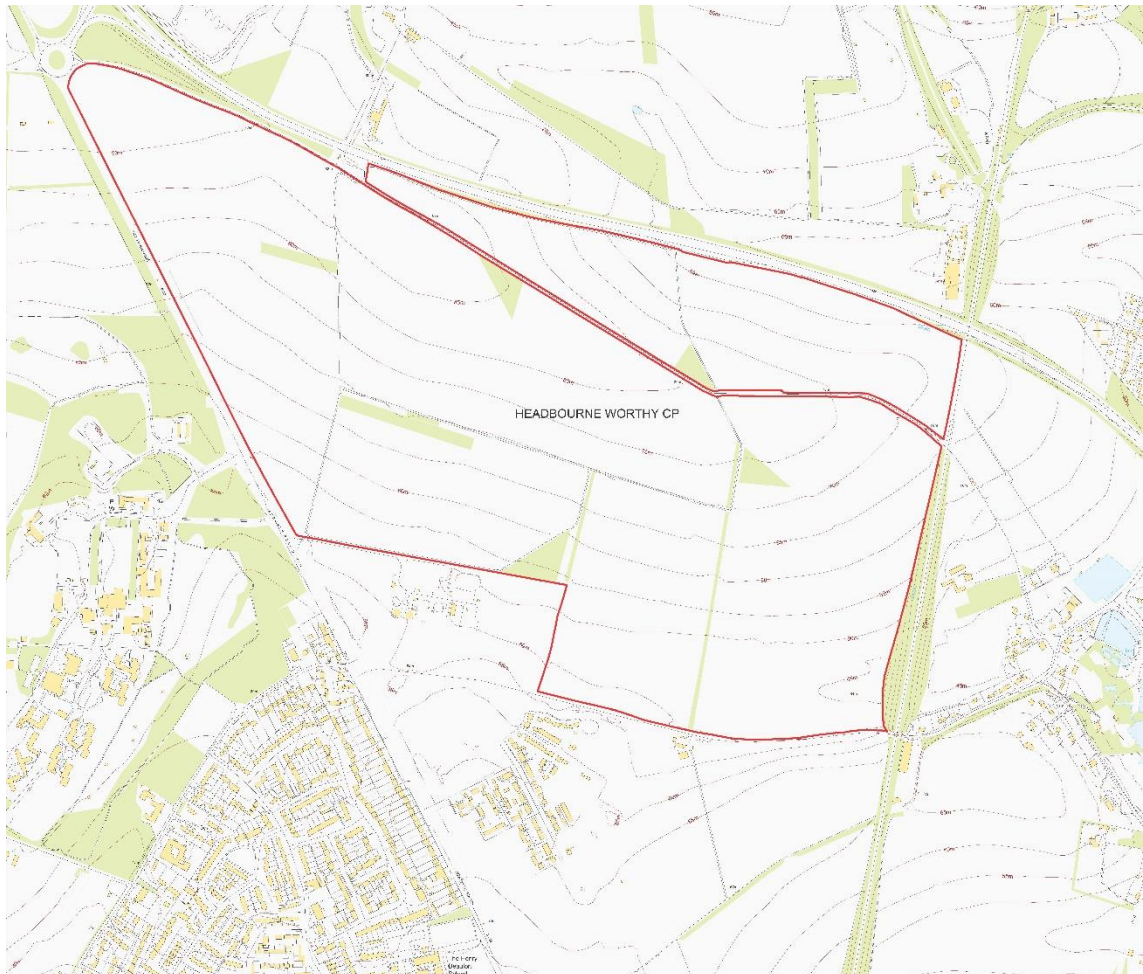
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1. Introduction

- 1.1 The Winchester City Council (WCC) Proposed Submission Local Plan (Regulation 19) is subject to consultation prior to submission for examination under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The emerging 2040 Local Plan is being prepared to replace the current adopted development plan for the district, which comprises the Local Plan Part 1 (Joint Core Strategy) adopted in March 2013 and the Local Plan Part 2 Development Managements and Site Allocations, adopted in April 2017. The review of the emerging Local Plan commenced in 2018 and has been subject to three consultation stages under Regulation 18, the Launch Consultation (September 2018), Issues and Priorities (April 2021), and Your Place, Your Plan (Draft Local Plan) in November 2022. Six years on from the first consultation exercise the planning authority is undertaking a consultation on a version of the Plan that it considers is sound and can now be submitted for examination.
- 1.2 It will be important to acknowledge and recognise the context in which the 2040 Plan is now being consulted upon and the influence that the proposed national policy reforms of the new Government have had on the timetable for preparation of the Plan. The imperative to consult and submit the plan for examination is undeniably driven by a local political desire to ensure that the policies of the 2040 Plan are examined against the December 2023 version of the NPPF.
- 1.3 While the transitional provisions for plan-making outlined by the proposed reforms allow for such scenarios to take place these do not obviate the obligation to ensure that the Government's objectives regarding the planning system are not unduly frustrated. It will be important that the Plan is examined against this backdrop and that there is a clear commitment on the part of all those participating in the process to expedite a policy shift towards higher levels of housing growth, both locally and sub-regionally, via the plan-led system. While the planning authority may be justified in moving forwards at pace to ensure that an 'up to date' development plan is adopted swiftly to provide clarity for decision-making at the local level, it is vital that momentum is maintained beyond this current plan-making stage, regardless of the outcome, so that a development plan, which is 'in-step' with the reformed planning system is adopted as quickly as possible during this Parliamentary term.
- 1.4 Vistry Group (Vistry) and Taylor Wimpey UK Ltd (Taylor Wimpey) have participated at each of the previous Regulation 18 consultation stages and have submitted representations that are consistent in their approach and recommendations. While these submissions relate to the joint land interest identified by Plan 1 (below) they address wider strategic spatial policy concerns that reflect the Council's corporate policy objectives.
- 1.5 These submissions should be read in the context of all previous representations made on behalf of Vistry/Taylor Wimpey and draw in matters raised previously where the policy-making process has failed to address points of challenge.

Plan 1: Site Location Plan



- 1.6 The land interest held by Vistry/Taylor Wimpey is not identified within the 2040 Local Plan. It has been promoted at each previous consultation stage as a development allocation option that could deliver strategic scale growth fully aligned with the Council’s stated corporate objectives, and as a key component of the Council’s drive towards reducing carbon emissions and addressing the declared Climate Emergency. The site has been evaluated by the Council but has been characterised as not required to fulfil the policy requirements of the 2040 Plan. It is notable that the Council has not rejected the location as unsuitable for development (see further below). The site is suitable for development and should be included as a development plan allocation.
- 1.7 Submissions to the Regulation 18 Draft Plan in December 2022 included three supporting appendices outlining:
- Planning for South Hampshire (Report)
 - Vision for Winchester Northern Neighbourhood (Vision Document)
 - Winchester Town – Assessment of SHELAA Sites (Report)
- 1.8 The Planning for South Hampshire report is updated as a component of these submissions to reflect the latest position regarding unmet housing needs within the partnership area and the implications of such for assessing whether the duty to cooperate has been met. The Vision document and the SHELAA assessment are not resubmitted at this consultation stage, but remain relevant as contextual evidence to be considered when this plan is examined.

1.9 The representations to the Regulation 19 Plan will focus on the following sections and policies of the Plan:

- Foreword
- Introduction:
 - Vision for the Area
 - Local Plan Objectives
 - Strategic Policy SP1 – Vision and Objectives
 - Strategic Policy SP2 – Spatial Strategy and Development Principles
- Carbon Neutrality and Designing for Low Carbon Infrastructure
 - Strategic Policy CN1 – Mitigating and Adapting to Climate Change
 - Policy CN2 – Energy Hierarchy
 - Policy CN3 – Energy Efficiency Standards to Reduce Carbon Emissions
- High Quality Well-Designed Places and Living Well
 - Strategic Policy D1 – High Quality, Well-Designed and Inclusive Places
 - Strategic Policy D5 – Masterplans
- Sustainable Transport and Active Travel
 - Strategic Policy T1 – Sustainable and Active Transport and Travel
- Homes for All
 - Strategic Policy H1 – Housing Provision
 - Strategic Policy H2 – Housing Phasing and Supply
 - Strategic Policy H3 – Spatial Housing Distribution
 - Policy H6 – Affordable Housing
- Winchester Site Allocations
 - Policy W1 – Barton Farm MDA
 - Policy W2 – Sir John Moore Barracks

2. Winchester District Local Plan 2020-2040 – Foreword

- 2.1 The Foreword to the Draft Local Plan does not contain policies or raise issues that concern matters of soundness directly. However, there is acknowledgement (1.4) that the Government is consulting on changes to the planning system that will introduce *considerably higher housing requirements* for the district. In introducing this plan, the Council asserts that continuing with preparation of the 2040 plan alongside a commitment to commence plan-making under the new system as quickly as possible thereafter is consistent with the Government’s objectives. This statement is robust only if examination of the 2040 Plan is treated as an interim stage in preparing a Local Plan that will fully address the challenges presented by the proposed changes to the planning system, consultation in respect of which has now closed.
- 2.2 The 2040 Plan does not represent the significant change from previous Local Plan strategies that is claimed; it follows a similar spatial approach to its forerunners and fails to adopt the necessarily ambitious housing delivery targets that will be required by changes to the standard methodology and the National Planning Policy Framework (NPPF). The long overdue reform of the planning system will rightly impose an obligation on local planning authorities to plan positively to meet actual development needs and to tackle the chronic issue of housing affordability that has plagued many local authority areas for decades. The challenges that are cited within the Foreword are real. However, the priorities identified should be re-ordered such that the Council fully embraces the challenge of providing enough housing to address identified needs and to tackle declining affordability within the district.
- 2.3 The Government is clear that it expects all local planning authorities to rise to the challenge within this current Parliamentary term of delivering 1.5 million new homes (300,000 dwellings pa), a figure derived from application of the revised standard methodology. For Councils such as Winchester this represents a significant uplift in the district housing requirement (not reflected in the 2040 Plan) and begins to impose a clear expectation (to be mandated within this Parliament) that unmet housing needs from genuinely constrained neighbouring authorities will be accommodated within related sub-regional areas. In Hampshire this will require authorities such as Winchester to purposefully step-forward to accept much higher levels of housing growth to compensate for shortfalls that will occur within the Partnership for South Hampshire (PFSH) authorities to the south. This will be a genuine step-change in the planning landscape of the district and will be the greatest challenge that the development plan will be required to meet.
- 2.4 The 2040 Plan does not embrace this challenge because it is proceeding in the expectation that the proposed reforms will not influence soundness considerations under the transitional provisions set out within the new Government’s revision of the NPPF. Such a course of action is acceptable only if there is a genuine intention to immediately review the 2040 Plan upon adoption and to swiftly adapt the spatial strategy to accommodate the development that will be required under the proposed reforms. In this respect the 2040 Plan examination should be treated as a prelude to what must follow immediately therefrom, with consideration given to the adaptability and compatibility of the planning framework that the 2040 Plan proposes as a component of a greater ambition to follow.
- 2.5 The Foreword to the 2040 Plan should articulate a commitment, to be translated into a policy undertaking, to immediately review the plan once it is adopted so that the proposed national reforms are translated swiftly into a local policy framework. This should be measurable and should include sanctions that would be triggered if there is failure to instigate an immediate review according to a prescribed timetable.

3. Introduction - Vision for the Area

- 3.1 The Local Plan is the document that gives spatial expression to the development objectives that the Council intends to pursue within its area of jurisdiction.
- 3.2 The Council Plan (2021 Edition) notes that the Climate Emergency and reducing the carbon footprint of the district are the major challenges that the authority faces, alongside factors including poor air quality, expensive housing costs to buy and rent, an ageing population exacerbated by younger people leaving the district, and poor provision of public transport, and safe walking and cycling routes in parts of the district¹.
- 3.3 Arising out of the Council Plan in the face of such challenges the Council declared a Climate Emergency and published a Carbon Neutrality Action Plan 2020-2030, the purpose of which is to set out a series of actions that can be taken to reduce carbon emissions in the district by 2030, to the point that neutrality is achieved. Planning and development are cited as critical factors.
- 3.4 In setting out that facts relating to carbon emissions in Winchester district the main sources of CO₂ are identified in a table on page 8 of the document:

Table 1: Source of District Carbon Emissions (WINACC 2017)

Sector	Tonnes CO ₂	Proportion of Emissions
Transport	287,000	42.5%
Domestic Energy	193,000	28.5%
Commercial Energy	172,000	25.5%
Agricultural/Miscellaneous	24,000	3.5%
Total	676,000	100%

- 3.5 The document notes that if carbon emissions arising from motorway traffic within the district are added emissions associated with transport rise significantly as shown below:

Table 2: Carbon Emissions from Transport (WINNAC 2017)

Sector	Tonnes CO ₂ All traffic	Proportion of Emissions
Transport	492,000	56.0%
Domestic Energy	193,000	22.0%
Commercial Energy	172,000	19.5%
Agricultural/Miscellaneous	24,000	2.5%

- 3.6 It is contended by the Council that it is not appropriate to include motorway traffic because these are emissions arising from the use of 'national infrastructure'. However, this fails to acknowledge that a proportion of the volume of traffic passing through the district on the motorway network will be doing so to reach destinations in

¹ The Challenges We Face – p.5

Winchester. Policy decisions that could be made by the local planning authority have the propensity to influence the number of such trips that are taken (by commuters travelling into the district) and therefore it is misleading to ignore such data.

- 3.7 While not all the traffic passing through Winchester on the M3 will functionally relate to the district, or the policy choices that are made, a proportion of it will. What is notable is that under both scenarios illustrated above transport makes the greatest contribution to overall CO2 emissions, and this is significantly greater than the next highest contributor – domestic energy use. Under either data set the impact of transport requires the greatest focus in tackling the causes of climate change locally.
- 3.8 Section 3 of the Carbon Neutrality Action Plan – Delivery Principles (page 13) notes that tackling the Climate Emergency will be at the heart of everything that the Council does, a priority that will be met by:
- Effect(ing) an increase in the proportion of journeys taken by walking, cycling, and public transport
 - Putting in place an adopted and up to date Local Plan with positive policies, which promote low carbon development and transport while protecting our heritage and natural environment, including policies designed to secure the development and use of land that contribute to the mitigation of, and adaptation to, climate change
 - Deliver(ing) the City of Winchester Movement Strategy and prioritise walking, cycling, and public transport throughout the district. (Nexus emphasis).
- 3.9 The Council Plan indicates recognition of the need to pursue a positive policy agenda around reducing emissions associated with transport. A simple interrogation of the data shows that transport, and principally car use, is the single most significant contributor to carbon emissions. This demands that a focussed policy response ought to be a core component of the Local Plan, having regard to the Council’s stated objectives.
- 3.10 What is lacking currently is a joined-up and purposive approach to land-use and transport planning that recognises that the spatial policy for allocations that underpins the Local Plan has the greatest potential to bring down carbon emissions and to engender behavioural change that will support the drive towards carbon neutrality.
- 3.11 The Foreword asserts that the major new challenges caused by the Climate Emergency faced by the Council demand a significant change to the policy regime set out in the adopted Local Plan. However, in respect of the most important aspect of the new Local Plan – its overarching spatial strategy - the Draft Plan fails to respond adequately to the challenges identified within the Council Plan, or the priorities that it articulates. This is a product, in large part, of adherence to growth requirements (housing) that are soon to be replaced and increased to respond more directly and effectively to need where it arises. The 2040 plan in this regard is out of step with current objectives for the planning system to be introduced via the Government’s reforms. It is therefore of critical importance that this plan does not attain a status that would allow it to frustrate and delay the more ambitious growth objectives that will apply to Winchester once the changes are implemented. If this plan proceeds to adoption it is vital that an immediate review mechanism forms part of the policy framework.
- 3.12 Table 3 below shows that far from embarking on a new strategy that redistributes most growth to locations that will support sustainable lifestyles (notably regarding travel demand and proximity to jobs, services and facilities) the proposed strategy ignores the primacy of Winchester Town and assigns a higher proportion of growth to the other areas of the district, notably the southern margins of the district (SHUA). Winchester ought to be the principal focus for development.

Table 3: Development Strategy Comparison

Development Strategy Area	Housing Requirement	Proportion
Winchester District Local Plan Part: Joint Core Strategy (March 2013)		
Winchester Town	4,000	32%
South Hampshire Urban Areas	6,000	48%
Market Towns and Rural Area	2,500	20%
Total	12,500	100%
Winchester District Local Plan 2020-2040		
Winchester Town	5,640	37.3%
South Hampshire Urban Areas	5,650	37.4%
Market Towns and Rural Areas	3,825	25.3%
Total	15,115	100%

3.13 Such glaring inconsistencies become more difficult to reconcile when reference is made to the section of the Plan that describes the emerging Vision and the three broad geographical areas of the district (carried forward from the adopted Local Plan for the purposes of spatial planning):

Table 4: Sub Area Characteristics

Sub Area	Characteristics
Winchester Town (WT)	<ul style="list-style-type: none"> • Largest settlement in the district/county town • Important centre for housing/employment • Significant commuting flows • Mismatch of workers and residents • Services and facilities hub • Sustainable location for growth and change
South Hampshire Urban Areas (SHUA)	<ul style="list-style-type: none"> • Response to PFSH area • Strong economic/social ties to the south • MDA delivering significant growth • Constrained neighbouring areas
Market Towns and Rural Area (MTRA)	<ul style="list-style-type: none"> • Many smaller settlements – villages to small hamlets • Rural nature is a constraint • Opportunities to address local needs

3.14 What is abidingly clear from this summary of the key characteristics is that Winchester, the principal settlement within the district, is an employment and housing hub that experiences significant daily commuting flows into the urban area, and functions in a way consistent with its county town status. It is acknowledged to be the most sustainable location for growth and change in the district and should intuitively be the principal focus for future growth, including the land to the north of Wellhouse Lane controlled by Vistry and Taylor Wimpey.

- 3.15 The South Hampshire area has strong functional ties with the conurbation to the south and is delivering significant growth via the MDA sites allocated in the adopted development plans of 2006 and 2013, which is expected to continue pursuant to those policy allocations.
- 3.16 The Council's own summary of the functional characteristics of each area supports the representations made to the Local Plan on behalf of Vistry and Taylor Wimpey at each Regulation 18 stage; namely that Winchester Town should be the principal focus for growth within the new spatial strategy. The SHUA sub area should be relied upon to meet the needs of the PfSH area to the south. However, the Council's spatial strategy has not changed, and the justification provided via the Regulation 18 response document do not rebut the substance of the points made with any force.
- 3.17 As stated previously, the Council's proposed spatial strategy does not follow the evidence or provide the spatial response that ought to flow from the wider policy objectives that purport to place the Climate Emergency at the centre of the Plan. There is a fundamental spatial deficit at the heart of the policy framework, which does not place sufficient emphasis on allocating strategic growth at the principal settlement, where the opportunity to drive behavioural change and to deliver genuinely sustainable growth is greatest.
- 3.18 A potential explanation may relate to the characterisation of Winchester and its setting, which is described in the Regulation 19 Local Plan as 'exceptional'², a description carried forward from the adopted Local Plan³. The characterisation of the setting and the historic, cultural, aesthetic, visual, and nature conservation attributes that are applied to the city create a perception that militates against a positive approach towards growth and change.
- 3.19 While many of the qualities that make Winchester a desirable place to live and work are certainly noteworthy, important, and are highly valued; their description as 'exceptional' creates the impression they are somehow remarkable and unequalled (which is not the case when considered objectively). The implication is that new development at or around Winchester will be extremely difficult to realise/implement. While it is necessary to acknowledge the qualities of place and setting that are inherent, it should be noted that there is no national landscape designation; no SPA/SAC designations; and no registered parks or gardens that would present obvious constraints to the realisation of development around the edge of the urban area.
- 3.20 In this context it is interesting to consider some key challenges identified in respect of the Profile of Winchester District contained in the adopted Local Plan (2013) at Chapter 2. It was noted then that *car ownership is high with the number of households with two or more cars approximately 50% higher than the national average. High car ownership provides more freedom of choice in terms of access to goods and services but also has a negative impact on the district's carbon footprint*⁴ (Nexus emphasis).
- 3.21 The profile continued; *a number of these factors, particularly when combined, present some key challenges for the district. Many of the affluent, mobile population commute to higher paid employment elsewhere, driving house prices higher than surrounding areas and creating a significant demand for more affordable housing for those who work in the district and wish to live locally rather than commute in. There is a particular need to address the needs of the ageing population and their housing requirements along with the needs of young people and families to retain sustainable mixed communities, which support a strong local economy*⁵ (Nexus emphasis)

² Winchester District Local Plan 2020-2040, paras 3.1, 12.2 – **Winchester Town**

³ Winchester District Local Plan Part 1: Joint Core Strategy (March 2013), para.2.11.

⁴ Ibid, para.2.2

⁵ Ibid, para 2.4

- 3.22 It is notable that the negative issues affecting Winchester highlighted within the introductory sections of the Pre-Submission Local Plan in 2024, are fundamentally the same as those that were identified by the Local Plan when it was adopted in 2013. Moreover, the Local Plan Review, adopted in 2006, also made particular reference to the difficulties for many people in accessing housing to meet their needs, which forced them to live outside of the district requiring them to commute unsustainable distances to work: *...of particular importance is the need for affordable housing, both for the increasing number of households that cannot afford to buy on the open market, and for those who could enter or move within the housing market if the available property was better suited to their needs. The high cost of housing in the district and the lack of sufficient affordable housing is leading directly to large numbers of local young people leaving the district and can only exacerbate unsustainable patterns of travel and commuting*⁶.
- 3.23 The deep-seated structural issues affecting the economy and the housing market in Winchester, which have a direct impact on commuting patterns and carbon emissions, have not been addressed by successive spatial strategies of the Local Plan. Despite having been identified consistently as a critical and socially divisive issue, the affordability of housing, and the implications flowing therefrom, within the district has not been dealt with effectively by any of the previous iterations of the Local Plan. A shortage of homes that can be afforded by a significant majority of the working population of Winchester has been acknowledged by successive plans, yet each time the policy framework fails to take positive action to address the challenge.
- 3.24 The use of the term 'Homes for All' is disingenuous, because housing in Winchester remains unaffordable to many and the provisions within this plan will fail to positively address what is a deep-seated, chronic problem.
- 3.25 In consulting on the Regulation 19 Plan the Council has acknowledged that there will be a requirement to immediately review the 2040 Local Plan upon adoption and this stated intention must be ensured through provisions that are introduced into the document. Only by accepting the need to swiftly move to a new version of the Local Plan that embraces the revisions to the standard methodology and the mandatory status of the local housing need figures it produces, will the rhetoric within this document be given meaning.
- 3.26 If the Council is truly committed to addressing the affordability crisis within the district through the plan-led system it should be looking forwards beyond the horizon of this proposed plan period, anticipating more complimentary large-scale MDA developments that will guarantee continuity of housing delivery and secure policy compliant levels of affordable housing (as the monitoring evidence collected by the Council demonstrates). It has not proposed such a policy framework in the 2040 Local Plan but must plan immediately for a successor strategy that can address the housing delivery challenges that will be introduced with the new NPPF, prior to the adoption of this version of the Local Plan.
- 3.27 In the context of what will soon be a far greater housing requirement to be met by the development plan for the district, and the importance placed by the Council on tackling the declared Climate Emergency, the revised spatial strategy, to be anticipated by this interim plan, should expect to concentrate significantly higher levels of strategic growth at Winchester. Such an approach would be justified not only because it would be consistent with the Council's carbon neutrality aspirations; it would also respond positively to meeting the needs of many who are simply priced out of accessing suitable housing to meet their needs, near to their families and places of work. The primary objective for this plan (and the future examination of it) should be to ensure that the foundations of a sustainable (in every sense) spatial strategy that can be built upon effectively are put in place.

⁶ Winchester District Local Plan Review – Adopted July 2006, para 2.21

Immediately thereafter a far more ambitious and purposeful development strategy should be developed that is in-step with the Government's ambitions.

- 3.28 Recognising that there will be an obligation to look beyond the 2040 Plan to address the requirements of the new planning system that the Government is in the process of introducing, the Vision for this Plan should properly look further ahead (consistent with the advice in paragraph 22 of the December 2023 NPPF), recognising that there will be development objectives that extend beyond the 2040 Plan period.
- 3.29 As drafted the Vision is not sufficiently ambitious in articulating the development challenges that the district faces and there is no mention of the acute housing affordability problems encountered by many of the population who live and work across Winchester district. The foreword to the Plan recognises that this is a significant issue for many, but the Vision does not mention anywhere how the plan will tackle it.
- 3.30 There is too great an emphasis, relatively, placed on combating climate change and protecting environmental assets when the fundamental purpose of the development plan is to manage development and growth to meet the needs of the population. The Vision should be clearer on what positive steps will be taken to deliver growth and what the outcome of these policy decisions will be; it should demonstrate how the spatial strategy and the development management policies that will be applied to the implementation of that strategy will create a district in 2040 that is founded on a low carbon society, where active travel choices are available to all, where suitable, accessible, and affordable housing is available to all, where the economy is thriving and successful, and where the built and natural environmental assets that the district possesses, and which are highly valued, are preserved and enhanced.

4. Strategic Policy SP1 – Vision and Objectives

Objectives

- 4.1 Paragraph 3.6 explains that the Vision of the Plan will be delivered pursuant to a series of objectives set under four sub-headings:
- Tackling the climate and nature emergencies and creating a greener district (7 objectives)
 - Living well (3 objectives)
 - Homes for all (1 objective)
 - Vibrant local economy (4 objectives)
- 4.2 It is notable that the subheading relating to homes has only a single objective that lacks any real ambition and fails to acknowledge the deep-seated inequalities that exist within the local housing market and the profound affordability challenges that have prevailed in Winchester for decades. Paragraph 2.13 advises that the delivery of affordable housing remains a key priority of the Local Plan, yet the Vision and objectives do not reflect this. The inference is that ‘affordability’ is a recurring problem that has pervaded successive plans (and the evidence supports this), yet there remains a lack of positive intent within the Council to proactively tackle the issue, an approach which the 2040 Plan maintains.
- 4.3 It is for this reason that there is a strong imperative to ensure that this plan is succeeded immediately by a new iteration prepared to reflect the revised standard methodology. This will ensure that local planning authorities are obligated to deliver levels of housing growth that tackle affordability in a more meaningful way, via targets that are derived using a stronger affordability multiplier, within an overall approach that directs homes to where they are most needed and are least affordable.
- 4.4 Local Plan making in Winchester demonstrates that the capacity to accommodate significant housing growth exists if the obligation to allocate housing is mandated by Government (the Kings Barton MDA is such an example). It is therefore vital that there is a swift transition from the 2040 Plan to its successor, in accordance with the proposed reforms.
- 4.5 **Strategic Policy SP1** is not effective or justified insofar as it requires development proposals to demonstrate how they will deliver the ‘*aspiration for each sub-area*’ set by the Vision and in turn contribute towards the objectives of the Plan. It is too vague and wide ranging to be purposeful.
- 4.6 To conform to the policy all development proposals/planning applications in Winchester would need to demonstrate how they would maintain the status of the city as the cultural and economic centre of the district with a significant range of services, facilities and employment, and help to attract a range of new uses as the role of the town evolves. They would also need to show how they would support the importance of the visitor and tourism economy, and the creative and education sectors. This is far too generic and could more appropriately be addressed by detailed topic specific policies later in the Plan.
- 4.7 The Vision and the provisions of SP1 are such that it is unclear how development proposals should respond to the requirements of the Policy. The Vision is not sufficiently grounded so that measurable outcomes can be derived from it, hence the purpose and need for the policy are unclear. It would be more appropriate to require development proposals to be aligned, where relevant, with the Vision and Objectives of the Plan by demonstrating compliance with the more detailed policies that flow from the Vision and Objectives. The current construction/wording of the policy could be deleted without affecting the robustness of the Plan.

- 4.8 However, under the circumstances that prevail around the consultation exercise, and the likely timetable for submission of the 2040 plan there is an imperative to ensure that the development plan swiftly accords with the Government's objectives for the planning system. On this basis Policy SP1 should be revised to include an immediate review mechanism, the requirements of which should be incorporated into the policy wording:

Strategic Policy SP1 – Reviewing the 2040 Local Plan

The Council is committed to delivering the objectives that underpin the Local Plan and recognises that to achieve this effectively it is vital that the policies and provisions within the development plan are up to date and reflect national objectives for the planning system. The Council will undertake an immediate review of the 2040 Plan upon its adoption, with an updated or replacement version of the Plan submitted for examination not later than 18-months from the adoption date of the 2040 Plan, and in any event no later than the end of December 2026.

If an updated or replacement plan that accords with the provisions of the National Planning Policy Framework (NPPF) is not submitted in accordance with the timetable specified above, the policies in the 2040 Plan that relate to the supply of land for housing will be deemed to be out of date in accordance with the terms of paragraph 11 (d) of the NPPF.

5. Strategic Policy SP2 – Spatial Strategy and Development Principles

5.1 The spatial strategy and development principles contained in **Policy SP2** are the fundamental components of the Local Plan upon which will be founded the success or failure of the Plan. The level of housing provided for by the Local Plan is central to the purpose and effectiveness of the Local Plan. Failure to plan properly to address housing needs locally, and in the wider functional economic area, would undermine a key purpose of the operation of the planning system. There is a context that must inform the future examination of this plan created by the proposed reform of the planning system that should be considered particularly when assessing the efficacy of the proposed spatial strategy.

5.2 The 2040 Plan has been prepared having regard to national planning policy provisions set out within the December 2023 NPPF, and previous published versions that were in place during the local plan review process, which commenced in 2018. The incoming Government has made very clear how it views this iteration of national policy via the consultation document accompanying the proposed reforms to the National Planning Policy Framework and the Planning System:⁷

11. The last Government's reforms to planning policy in December 2023 were damaging for housing supply, disrupting plan-making and undermining investor confidence. We are therefore acting swiftly to reverse many of these changes, and implement our manifesto commitments, so that local councils, developers and investors understand exactly how we expect the planning system to function, over this parliament and beyond.

12. We expect immediate action. We are keen to engage with all stakeholders to understand the impacts of these reforms. The Deputy Prime Minister will write to all local planning authorities making clear that we expect universal coverage of local plans, and reviews of Green Belt boundaries where necessary to meet housing need. In this consultation, we have therefore set out exactly how local planning authorities should proceed to make ambitious local plans as quickly as possible. (Nexus emphasis)

5.3 This Local Plan is being advanced with the objective that it will be examined against the requirements of the December 2023 NPPF and therefore will not be obligated to make provision for a district housing requirement derived using the new standard methodology, which will take necessary steps to address chronic housing affordability issues that exist in districts such as Winchester. The 2040 Local Plan is not therefore in-step with changes to the planning system that are taking place nationally and which are central to the Government's manifesto commitments. It is clear, with reference to the text quoted above, that such a plan is dramatically out of step with the current Government's thinking and would be irrelevant in terms of its approach to implementing a robust and up to date housing strategy from the outset.

5.4 The Government has proposed transitional arrangements for local authorities with local plans that are in preparation, set against the objective that universal plan coverage should be achieved as swiftly as possible, so the foundations for a plan-led system that can deliver 1.5 million homes within this Parliamentary term can be achieved. This ambition is founded upon implementation of the reformed NPPF and associated revisions, not a continuation of the 'damaging' existing version. The explanatory document accompanying the proposed reforms is clear in this respect⁸:

5. To provide stability and certainty for plans at latter stages of scrutiny, those plans at examination will continue to be examined under the version of the NPPF they were submitted under. However, if the revised LHN figure is

⁷ MHCLG – 02/08/24

⁸ Ibid – Chapter 12

more than 200 dwellings per annum higher than the annual housing requirement set out in the adopted version of the plan, upon introduction of the new plan-making system, the local planning authority will be required to begin preparation of a plan under the new system as soon as possible, or in line with any subsequent arrangements set out to manage the roll-out of the new system.

6. To help local planning authorities with advanced plans to proceed to examination at pace and support the Government's ambition to build more homes, those plans that have reached Regulation 19 publication stage but not yet been submitted for examination one month after the revised framework is published, with a gap of no more than 200 dwellings per annum between the local planning authority's revised LHN figure and its proposed housing requirement (as set out in the Publication version of the plan), should also progress to examination under the version of the NPPF it has used when preparing the plan thus far.

7. However, those with a more significant gap of over 200 dwellings per annum between the local planning authority's revised LHN figure and the emerging housing requirement will need to revise its plan in line with the revised NPPF before submitting the plan for examination no more than 18 months after the publication of the revised NPPF. We recognise that these arrangements would require some local planning authorities to undertake unforeseen additional work and reopen engagement with communities. Therefore, the Government will provide direct funding support to help these authorities progress their plans to examination quickly.

- 5.5 It is necessary to pay heed to the situation at the time of writing, and to that which prevailed during consultation on the proposed reforms to the NPPF that commenced on 30 July 2024, when reflecting on this plan's objectives and the spatial strategy that flows from them.
- 5.6 At the time the NPPF consultation commenced, Winchester was at the Regulation 18 stage of plan making, a stage that had been ongoing since September 2018. Within a period of four weeks, a Regulation 19 version of the Plan had been voted through Council (informed by a report containing advice from King's Counsel) and was subject to this pre-submission consultation exercise. The six-week consultation period, which closes at midnight on Sunday 13 October 2024, will likely swiftly then be followed by the Regulation 22 submission stage, ensuring that the 2040 Plan is formally at examination by the effective date⁹. This is important because the housing requirement within the 2040 Plan is (significantly) more than 200 dwellings per annum below that to be set for the district by the revised standard methodology, which would mean (under the terms of paragraph 7 quoted above) that the Plan would need to be revised to bring its strategy into line with the requirements of the new NPPF and to be submitted for examination within a period of 18-months from the effective date, had the Regulation 22 stage not be reached. The Council is proceeding at pace to avoid this scenario.
- 5.7 While the Council can work to this timetable under the terms of the transitional provisions, it is critically important when the 2040 Plan is examined that all consideration of the policy provisions contained within it are viewed through this prism; recognising that the Council has proceeded within the letter, if not the spirit, of the proposed reforms.
- 5.8 To ensure that the Government's objectives are not circumvented, in a district where the acute affordability challenges that the reforms seek to arrest are rife, it is vitally important that there is a strict sanction in place that guarantees the Plan is immediately reviewed to bring it into line with the Government's national objectives. The requirement to review the plan '*as soon as possible/at the earliest opportunity*¹⁰' is insufficient because such a phrase has no certain meaning. The obligation to review plans that are progressed in the manner that Winchester City Council is proposing should be immediate and unavoidable. Failure to ensure such in the context

⁹ One month after publication of the revised NPPF

¹⁰ Proposed NPPF para.227

of the process relating to this plan, through mechanisms inserted into it to guarantee immediate review, would be a perverse decision, set against the changing national picture.

- 5.9 Should it be determined that the 2040 plan is able to proceed to adoption it is vital that the immediate review mechanism proposed to be inserted into **Policy SP1** is incorporated into the plan.
- 5.10 Policies SP2 and H1 are closely interlinked and therefore the response to the provisions contained within each necessarily overlap. The submissions set out below were made in largely the same vein at the Regulation 18 consultation stages during preparation of the 2040 Plan and were germane in the context of the earlier iterations of the NPPF. However, these representations assume greater force when considered against the changing national context that will dramatically raise the starting threshold for calculating a mandatory minimum housing requirement for the district once the revised NPPF is published. While the Council is technically able to advance the plan under the transitional provisions, it is material to consider how it would be required to prepare a plan that would be consistent with the revised NPPF, when examining the soundness of these policies.
- 5.11 As highlighted above, successive Local Plans have recognised chronic structural challenges that affect the district, which exert a strong influence on the quality of life enjoyed by residents and workers within the district. These also place stress on the natural environment. With the declared imperative to tackle the causes of climate change that are being keenly felt locally, the spatial strategy that defines the Local Plan ought to have a carbon-reducing objective at its heart. It does not and fails to properly address the challenges that lie at the heart of the Plan – most notably the chronic lack of housing that is affordable to the majority of the working population of the district.
- 5.12 This issue is central to everything that the Council is proposing to achieve. The revised standard methodology will introduce a much stronger affordability multiplier that will require planning authorities to make provision for higher levels of housing growth designed to tackle the acute issues that prevail in places such as Winchester. By choosing to proceed with the 2040 Plan at pace and therefore avoid having to revise this plan to incorporate a higher housing requirement a conscious decision has been taken to ignore the opportunity to tackle the structural issues that affect the district and contribute to the climate emergency the Council is determined to address. There is a lack of joined-up thinking that will defeat proper planning of the area.
- 5.13 By choosing not to proactively address the affordable housing challenges the district faces the Council cannot hope to fully deliver against its carbon neutrality objectives because the district will be unaffordable to those who sustain the local economy and provide the services and support on which the (increasingly ageing) resident population relies. Consequently, much of this population will be resident in more affordable locations outside the district and will continue to commute into the city, mostly by car. The step-change that the Council requires to drive down carbon emissions will not occur. The spatial strategy pursued by this plan is not in step with the zero carbon aspirations espoused by the Council.
- 5.14 As drafted the spatial strategy is not sufficiently ambitious to deliver against the key objectives the Council has identified as central to the philosophy of the Plan, or to anticipate and plan for the likely development pressures that will arise in the South Hampshire Urban Area that will need to be accommodated in less constrained districts, such as Winchester. This Plan is deficient in tackling the basic, central purpose of a development plan – namely planning for sufficient housing to meet the needs of the district population (working and resident); a fact clearly demonstrated by the new standard methodology outcomes for Winchester.
- 5.15 There is a complimentary, sustainable, deliverable spatial strategy available to the Council that would be aligned closely with the overarching (stated) ambitions of this Plan, and which could offer a tailored solution that would

meaningfully contribute to meeting development pressures that will arise in the southern part of the county, that Winchester will in due course be required to respond positively to.

- 5.16 Previous submissions made on behalf of Vistry/Taylor Wimpey to the Regulation 18 Draft Plan consultation (December 2022) set out clear arguments why the Council should have chosen a far more ambitious housing target for this plan, using the original standard methodology as a starting point, but going significantly beyond it as a means of addressing the chronic affordability issues that prevail.
- 5.17 The ratio of median house prices to incomes is an accepted proxy for demand within the housing market, clearly showing that for areas where the multiplier is greatest, demand is highest. Winchester is in the top 5% of least affordable districts in which to live (outside London and the Isles of Scilly) and therefore the Council could have taken this as a clear signal that a significant uplift in the requirement would be justified. It chose not to.
- 5.18 The Introduction to the Draft Plan acknowledges that it is becoming harder and harder for people of all ages to find a suitable house they can afford¹¹ and states that the delivery of affordable housing is a **key priority of the Local Plan**¹². However, as with other aspects of the Plan the rhetoric is largely empty when the approach is examined.
- 5.19 Vistry/Taylor Wimpey advocated within earlier representations that the Council should incorporate an upward adjustment factor of its own to address the specific problems of affordability that prevail and pursue an allocation strategy founded upon strategic scale allocations, where there is greater potential to impose strict affordable housing delivery requirements and where evidence shows there is more certainty that policy compliant levels of delivery will be achieved (unlike small sites/windfalls). The Council's MDA policies have demonstrated that strategic allocations have the greatest propensity to achieve significant affordable housing delivery, and to positively influence placemaking in support of the Council's wider corporate objectives. This plan does not build on this spatial option in a meaningful way.
- 5.20 However, with the advent of a higher housing requirement for the district derived from the new standard methodology, and a clear obligation to cooperate purposefully on strategic matters (such as accommodating unmet housing needs) through plan-making, the reforms to the planning system will require Winchester to adopt an ambitious future spatial strategy; active consideration should be given to this now. A material consideration of great weight at the forthcoming examination should be the extent to which the proposed spatial strategy can be built upon and developed to accommodate the much higher levels of housing growth that the reforms will demand.
- 5.21 The 'Homes for All' section of the 2040 Plan considers the distribution of growth proposed and the component of supply that is identified to help meet unmet housing needs arising from the PfSH area. Further comments relating to the spatial strategy and the soundness of the approach are submitted against these policies.

¹¹ Para 1.2

¹² Para 2.15

6. Carbon Neutrality and Designing for Low Carbon Infrastructure

- 6.1 Vistry and Taylor Wimpey are committed to tackling the challenges of climate change and acknowledge the important role the development industry has to play in the national transition to a low and zero carbon society.
- 6.2 In this respect, while support is expressed for the overarching aims of **Strategic Policy CN1** that seek to mitigate and adapt to the impacts of climate change, and for the Council aspiring to become a carbon neutral authority, there are reservations.
- 6.3 Indeed, as stated elsewhere within these representations, the principal response to tackling the causes of the Climate Emergency the Council has declared should be via a spatial strategy that focusses development at scale in the most sustainable locations, near day-to-day services and facilities so that motorised travel demand is reduced. As consistently highlighted within successive sets of representations, carbon emissions generated by transport are significantly higher locally than those arising from any other sector. A joined-up, sustainable, spatially coherent strategy should therefore underpin the Local Plan, with development at scale concentrated at Winchester Town where the greatest potential exists to promote active travel and to reduce travel demand. This is the most effective response to the declared climate emergency that the Council could pursue.
- 6.4 The submission plan notes at paragraph 4.6 that *'planning does not have control over all of the actions that are needed..to encourage us to live a more carbon neutral lifestyle. Change will be required across many areas that fall outside matters that spatial planning can control'*. The irony of this statement is that while the Local Plan highlights the issue, it does not then focus purposefully on spatial planning matters that would have the greatest potential to make a difference via the planning system – the pursuit of spatial development policies that are focussed on reducing carbon emissions.
- 6.5 The importance of planning at scale, a policy response pursued successfully in the adopted Local Plan through the MDA allocations, is evidenced by the propensity for such sites to include the provision of local centres and facilities that can meet the needs of the resident population, support self-containment, and foster the creation of 15/20-minute neighbourhoods. The North Whiteley MDA is a highly successful example of this policy approach, and the adjoining Kings Barton MDA will create locally accessible facilities to meet the needs of its population in due course. In the case of Whiteley, the scale of the MDA (3,500 dwellings) provides greater potential to create a wider range of services and facilities compared to Kings Barton (2,000 dwellings). However, a decision to continue growth northwards incorporating the land to the north of Wellhouse Lane would create a cohesive neighbourhood of up to 4,000 dwellings matching and exceeding the scale of Whiteley, with all the self-containment advantages and active travel opportunities that would associate with such critical mass. If the Sir John Moore barracks site is also, eventually, brought forward (see later comments under Policy W2) the critical mass of planned growth to the north of the city centre would be in the region of 5,000 dwellings, with appropriately scaled supporting infrastructure. This would have huge potential to drive behavioural change in support of low carbon-generating lifestyles.
- 6.6 The Council, within the Regulation 18 response paper, contends that the proposed allocations within the 2040 plan are the product of assessment with the focus on sustainable locations that have the greatest potential to support the use of public transport and sustainable modes. However, reference to the Integrated Impact Assessment (IIA), which has informed the Council's policy framework, suggests otherwise. It appears, contrary to the claims made, that the Council has chosen not to pursue strategies that have the greatest potential to achieve significant reductions in carbon emissions.

- 6.7 The IIA assesses the likely sustainability effects of the various options for growth that comprise the spatial strategy (Table 4.2 p.110). Five options are evaluated against the 14 objectives that formulate the IIA. Objectives 1 and 3 – Climate Change Mitigation and Climate Change Adaptation achieve the highest scores against the options that concentrate growth at Winchester/and or within large scale strategic allocations. Furthermore, if the performance across all 14 objectives is quantified (by applying a consistent numerical scoring system to the methodology in the IIA in place of the series of +/- and ?) to allow for direct comparison and then compared, the spatial option of concentrating growth at Winchester is the highest performing option.
- 6.8 If reference is then made to the evaluation sections that follow the assessment table, there is acknowledgement that *‘the most significant source of carbon emissions and air pollution in the district is from transport’* (para.4.29). In this context the text notes that: *‘Winchester Town provides access to frequent bus services to Southampton, Harestock and Kings Worthy amongst other locations..(and) The town also benefits from a higher number of bus stops than other settlements in the District as well as four park and ride sites, which allow for connections to the town centre and railway station. From Winchester Town there are direct train connections to London Waterloo, Southampton, Portsmouth, Bournemouth, Weymouth, Micheldever, Shawford and Botley’* (para.4.29).
- 6.9 Expanding on this theme, paragraph 4.30 notes: *‘The highest levels of emissions per capita from commuting are in the north of the district including South Wonston, Wonston, Sutton Scotney, Micheldever and Micheldever Station. The areas of the district which perform most favourably in terms of mean CO2 emissions per capita include parts of Winchester Town.’* Paragraph 4.31 continues: *‘Data available at the MSOA level also shows that within Winchester Town only one area (MSOA Winchester 005 - Winchester West) reports levels of commuters driving to work by car or van that is over 20% (and) Areas within Winchester Town also have the highest percentage of commuters travelling to work by foot and by train.’*
- 6.10 Despite recognising all these positive spatial strategy attributes and noting that the spatial option of concentrating most development at Winchester would: *‘strengthen the role of Winchester Town as the main service provider in the plan area (and) provide increased opportunities for residents to work locally or commute by train or bus’* (para. 4.42) the assessment somehow concludes that focussing growth where there is the greatest potential to reduce reliance on the private car could have adverse impacts by creating undue pressure on services, resulting in an uncertain effect. The assessment outcomes do not reflect the evidence and imply a likelihood of bias against a Winchester focus that is not objectively founded on the evidence.
- 6.11 **Policy CN1** should be set within the strategic context of a spatial policy framework that places the locational aspects of tackling climate change at its heart. As drafted the new Local Plan does not have sufficient focus on this opportunity and is therefore starting from the wrong place in determining the overall strategy. There is not a suitably wide suite of allocations that are based on this principle: the reduction of carbon emissions driven by the objective of curtailing travel demand and promotion of highly accessible places as the foci for development.
- 6.12 MDA scale development to the north of Barton Farm/Kings Barton on land controlled by Vistry and Taylor Wimpey, alongside the proposed W2 allocation at Sir John Moore Barracks (building on the W1 MDA allocation at Kings Barton) would provide the bedrock for a spatially coherent development strategy with carbon reduction ambition at its heart. In the context of a far greater housing delivery requirement via the new standard methodology that will shortly be introduced, it is vitally important the Council swiftly embarks upon updating the proposed spatial development strategy via an immediate review of the 2040 Plan.
- 6.13 The approach taken by **Policy CN2 – Energy Hierarchy**, should be adjusted to include reference to the positive spatial aspects of planning that will reduce energy consumption, noting that all sites should be designed and planned in ways that minimise travel demand (as a secondary component of an overall spatial strategy advanced

by the Local Plan that allocates sites with this objective in mind). The pursuit of an energy hierarchy policy that includes this factor as the first consideration would be more robust.

- 6.14 Policy CN3 – Energy Efficiency Standards to Reduce Carbon Emissions.** The policy requires all new residential development to demonstrate net zero operational carbon onsite by prescribing acceptable energy use standards comprising space heating demand of less than 15 kWh/m²/year, and overall total energy demand of less than 35 kWh/m² per year, calculated using energy performance predictive modelling tools.
- 6.15** The construction of energy efficient homes that are adaptable and flexible is supported, but Vistry and Taylor Wimpey consider that such requirements could and should be mandated most effectively, nationally, via the Building Regulations and the Future Homes Standard (FHS), thereby applying a consistent national standard that all developments should be required to meet, irrespective of location.
- 6.16** The Council is electing to impose requirements locally that go beyond current standards, in doing so it must be able to demonstrate that this is consistent with national policy and is in accordance with the provisions of the most recent written ministerial statement (WMS) addressing the matter (13/12/2023). In addition, the policy approach should have clear regard to the recent High Court judgement ([2024] EWHC 1693 Admin – 02/07/2024), which challenged the WMS, a ground of which argued that the WMS unduly restricted local authorities in exercising powers granted to them in respect of policies addressing climate change. The challenge failed on all three grounds and confirmed that energy efficiency standards that are included within local plan policies should be within the scope of the Building Regulations to avoid circumstances where multiple, inconsistent regulatory requirements are set.
- 6.17** To ensure the policy is sound the Council must be able to demonstrate that the requirements of the WMS are adhered to fully; additional standards over and above Building Regulations, which provide the baseline technical standard for all new homes, should be required only if they address a clearly evidenced locally occurring need, justified by locally specific data and where their impact on viability has been considered. This position is reinforced by NPPG, paragraphs 007 Reference ID: 56-007- 20150327; and 020 Reference ID: 56-020-20150327. It is acknowledged that the City Council has an ambition to accelerate the move towards carbon neutrality as a proactive response to climate change and this is supported in overall terms.
- 6.18** Vistry and Taylor Wimpey recognise the importance of delivering development that is truly sustainable and appreciate the role that the development industry must play in this respect. The Council must ensure that its Plan is in-step with national policy frameworks in this respect and demonstrate that the approach taken locally is justified and sound.
- 6.19** However, as set out above the spatial strategy that underpins the plan is not sufficiently rooted in tackling climate change because it fails to focus development at locations where the opportunity to support sustainable lifestyles is greatest. The planning system is concerned principally with the development and use of land; therefore, the most effective contribution that can be made to combatting climate change is through the preparation of spatial development strategies within Local Plans that allocate land for development in locations that actively support the adoption of sustainable lifestyles.

7. High-Quality, Well-Designed Places and Living Well

- 7.1 Vistry and Taylor Wimpey are committed to high-quality placemaking and recognise and support the intentions of **Policy D1**.
- 7.2 With regard to the ensuing paragraphs of this section of the 2040 Plan Vistry and Taylor Wimpey are interested particularly in the assessment of Winchester and its setting described at paragraphs 5.43 – 5.50. There is agreement that the three spatial areas that are used to inform the strategy of the Draft Plan are distinct and different and that they each perform different roles. It is critical that the Draft Plan is clear and consistent in its messaging and that the spatial hierarchy that underpins the entire plan is transparent in pursuit of its objectives, at the heart of which is the drive to address the Climate Emergency the Council has declared. The primacy of Winchester Town must be front and centre in all policy decisions that are taken.
- 7.3 The key components of the Local Plan Vision for Winchester (p.80) should be revised throughout the plan as set out below:

Local Plan Vision – Winchester

As the largest settlement in the district and the county town, Winchester is the principal focus for housing and employment in the area covered by the Local Plan. The Town experiences significant unsustainable daily commuting flows due to a lack of housing that is affordable to large sections of the working population. Established travel links to London also support high levels of out-commuting. Policies in this Local Plan will aim to address the imbalance between affordable homes and jobs as a key objective in the path to achieving carbon neutrality. Winchester Town is a hub for many services and facilities that benefit residents and businesses throughout the district and beyond and is the most sustainable location where growth and change can occur in response to the challenges presented by the Climate Emergency. While growth and change are needed, they must be managed sensitively in ways that preserve and enhance the important natural, historical, cultural, visual and aesthetic qualities that define the character and setting of the town.

- 7.4 The Vision should be captured in a way that balances the necessary imperative for sustainable growth, while ensuring that the quality of place, which is recognised and valued, is preserved. However, the Plan should face into the challenges that the Climate Emergency presents comprehensively, ensuring that the spatial strategy is aligned fully with the need to reduce travel demand, encourage growth in the right places, and control how that growth takes place, through the imposition of policy criteria that apply directly to specific allocations.
- 7.5 The summary of the characteristics of the setting of Winchester and the numerous historic buildings and attributes possessed by the Town are noted. However, it should be recognised that views across and toward the Town are not all equally sensitive, or constrained, as the Landscape Character assessment identifies¹³. Views from the north, from Down Farm Lane towards the centre, are characterised predominantly by the outer suburbs of the urban area and the emerging form of the Kings Barton MDA. The significant historic forms that are identified in paragraphs 5.43 and 5.44 are characteristic, but not so in views from this direction. The opportunity to make provision for further MDA scale growth within this relatively unconstrained northern sector is significant and would not compromise the factors that are highlighted.

¹³ Winchester City Council Landscape Character Assessment (April 2022)

- 7.6 It is notable also that growth in this location would be contained by the line of the A34, which provides a clear and defensible demarcation between the urban sphere/envelope and the open countryside beyond.
- 7.7 Paragraph 5.49 notes the desire to move towards the 15-minute City model and to an urban environment that is not dominated by the car, and which supports walking and cycling. The most effective means via which such a strategy could be implemented would be through the concentration of growth at scale in locations that support such a modal shift, and which provide opportunities to masterplan new communities based around active travel. Piecemeal responses that seek to retrofit solutions in locations already constrained by established street patterns, heritage assets, and land availability will necessarily be limiting.
- 7.8 In this regard Vistry and Taylor Wimpey support suggestions made by the City of Winchester Trust via the consultation that a masterplan for the whole of the urban area should form part of the Local Plan, with strategic growth planned for in a comprehensive manner founded upon principles that support modal shift towards active travel and foster the creation of 15-minute neighbourhoods. The Vision for the Winchester Northern Neighbourhood submitted by Vistry and Taylor Wimpey in support of the R.18 Draft Local Plan consultation in December 2022 is based on such an approach and should be a key component of a revised spatial strategy that defines the approach of the successor Local Plan that should be prepared to meet the development challenges that will be presented by the new NPPF.
- 7.9 The Winchester Town Neighbourhood Character Areas map that appears on page 82 of the plan should be expanded to focus on the full extent of the urban area of the city/town, given that the purpose of this section of the plan is to inform a vision for Winchester. The context surrounding the 2040 Plan is vitally important and this document should anticipate changes to come immediately following the conclusion of this 'interim' preparation/examination stage. In support of this contention (given what are newly occurring circumstances surrounding the examination of this plan) it would be entirely reasonable to interpret paragraph 22 of the NPPF in a way that demands that the planning authority adopts a visioning approach that looks further ahead – at least thirty years – because it is clearly going to be the case that the policy framework of this document will need to be immediately revisited and adapted to anticipate the increased development requirements that will prevail before this plan is adopted.
- 7.10 A requirement to plan for higher levels of housing growth will be manifest once the new NPPF is published and Winchester, as the most sustainable location within the district, should be the primary focus. The vision referred to by this plan must be re-cast in recognition of this and should therefore extend to include those areas that will potentially become part of the city in future. It would be appropriate against this background for the contextual plan to be extended to cover a wider area, with all the land contained within the sweep of the A34/M3 included to illustrate the potential that exists for the city to expand.
- 7.11 This area does not necessarily need to be earmarked by this document, recognising that due process needs to be followed, but to ensure there is clarity and transparency, the explanation of the vision should highlight that future development pressures (beyond the scope of the 2040 plan) are likely to require the future expansion of the city, which this plan acknowledges and has regard to. The allocations proposed within this document form the initial stages of a longer-term development vision that will involve the assessment and future allocation of land around the urban area to address future growth requirements.
- 7.12 **Strategic Policy D5 – Masterplans.** Vistry and Taylor Wimpey acknowledge the purpose and value of comprehensive masterplanning and recognise that high quality placemaking is dependent on clarity and certainty in this regard. However, the policy as drafted is vague and unclear as to its purpose and operation. There is no clear definition of when a masterplan will be required, reference is made to 'large sites' in multiple

land ownerships without defining qualifying criteria clearly. There is also a lack of clarity regarding when such plans would need to be provided - pre-planning application, or as part of an application, or how such plans would be agreed, or the weight they would carry.

- 7.13 Paragraph 5.71 refers to *'agreed plans'* that will *'guide....future development proposals'*, which infers there will either be a pre-application requirement that such plans will be approved so they can inform future planning applications (SPD), or that they will form part of an outline scheme and therefore guide subsequent reserved matters submissions. The policy is unclear. Paragraph 5.72 adds further to the confusion, suggesting that the need for any such plan will be decided by the local planning authority on a *'site-by-site basis'*, unless an allocating policy specifically requires one.
- 7.14 A more effective way to ensure that high quality placemaking is achieved by the Local Plan is to embark from the outset of plan-making in a truly collaborative manner by engaging positively with landowners and site promoters in identifying and developing properly considered and planned development allocations that include key principles defined within the allocating policy. Such an approach would avoid uncertainty and would ensure that key sites on which the spatial strategy of the plan relies are robust and comprehensive in their foundation. The uncertainty inherent in this policy reflects the decision to allocate sites, as core components of the development strategy, that the planning authority is unable to decisively plan for. Policy W2 illustrates the situation; the Council is uncertain as to the capacity of the site and defers a range of issues to future masterplanning exercises, that will occur beyond the scope of the allocating policy.
- 7.15 The policy is unclear and lacks the necessary precision to be considered effective and therefore sound.

8. Sustainable Transport and Active Travel

- 8.1 Vistry and Taylor Wimpey endorse fully the rationale and reasoning advanced within the Draft Local Plan that supports the promotion of sustainable travel opportunities and reducing reliance on forms of transport that drive climate change. The background and supporting paragraphs within section 6 that precede **Policy T1** are aligned fully with the representations made concerning all aspects of the 2040 Local Plan and its strategy.
- 8.2 There is clear recognition within the document that transport is a key contributor to climate change and therefore significant intervention is required to change travel behaviours and support the transition to less polluting modes of travel. However, there is a glaring disconnect between the assessment of conditions that prevail currently and the actions required to implement positive and effective change.
- 8.3 The logic that is articulated across paragraphs 6.1 to 6.25 of the 2040 Plan suggests that the Plan contains a clear spatial strategy founded upon focussing development at locations that dramatically reduce the need to travel, where access to public transport and non-polluting forms of transport is highest. Vistry and Taylor Wimpey endorse the observations and sentiments that are set out. However, as set out in submissions to **Policy CN1**, which refer to the findings of the Integrated Impact Assessment (IIA), the evidence is not followed.
- 8.4 The IIA makes clear that Winchester city is the most sustainable location in the district in transport and travel terms and has the greatest propensity to drive sustainable travel behaviours. Despite acknowledging this the spatial strategy does not act upon the evidence and fails to focus development at Winchester proportionately in ways that would drive sustainable travel behaviours.
- 8.5 In this regard the policy is redolent of so much else in the Draft Local Plan; there is much rhetoric and positive intent but a profound lack of policy that will in any coherent or effective way tackle the considerable challenges that exist. It is vital that the 2040 plan is reviewed immediately to ensure the spatial development strategy that succeeds that which is now proposed for this plan is founded squarely on the principles advanced by the Council in respect of sustainable travel and carbon reduction. The Council has identified the right parameters to inform the strategy but has produced a policy framework that cannot hope to deliver effectively to address the challenges the Council asserts are central to this plan-making exercise.

9. Homes for All

- 9.1 The text preceding **Strategic Housing Policy H1** that introduces this chapter of the 2040 Plan is important in the context of this consultation and the examination process that will follow.
- 9.2 Paragraph 9.1 sets the scene and highlights that the Government wants to boost the supply of new homes and is therefore planning for the delivery of ‘*about 300,000 homes per annum nationally*’ (1.5 million homes within this Parliamentary term). It is stated that the minimum amount of additional housing required in the future is set by Government. The proposed reform of the planning system being undertaken by the Government confirms that this is the case.
- 9.3 The consultation document that accompanied the proposed changes to the NPPF makes clear that the reformed system for plan-making will:
- A). make the standard method for assessing housing needs mandatory, requiring local authorities to plan for the resulting housing need figure, planning for a lower figure only when they can demonstrate hard constraints and that they have exhausted all other options;*
- C). implement a new standard method and calculation to ensure local plans are ambitious enough to support the Government’s manifesto commitment of 1.5 million new homes in this Parliament.*
- 9.4 While the previous Government made changes to the NPPF in December 2023, which diluted the obligation to meet minimum local housing needs generated by the standard methodology – characterised by this Government as damaging to housing supply – the proposed reforms will remove this uncertainty. As described at paragraph 9.1 of the 2040 plan, the new standard methodology will set the minimum housing requirement to be included in local plans. The new methodology is designed to be aligned more closely to the Government’s aspirations and will achieve a more balanced distribution of homes across the country, by directing new homes to where they are most needed and are currently least affordable¹⁴. This is the backdrop against which this plan is being consulted upon and will be examined, albeit the objective of the Council is to ensure that the 2040 plan in examined against the provisions of the 2023 version of the NPPF, which this Government has characterised as ‘*damaging for housing supply*’¹⁵.
- 9.5 The new standard methodology generates an annual minimum housing need figure for Winchester district of 1,099 dwellings, compared to the figure of 676 dwellings generated by the original version, which the 2040 plan uses (paragraph 9.4).
- 9.6 Vistry and Taylor Wimpey submitted comprehensive representations to the Regulation 18 draft Local Plan consultation in December 2022, which set out a clear argument in favour of treating the standard methodology derived figure of 676 dwellings very much as a minimum starting point, a point also made within the earlier Regulation 18 consultation responses, submitted in April 2021.
- 9.7 Table 7 of the December 2022 representations proposed (and the preceding text made the case for) a housing requirement for the district of 20,230 dwellings (1,011 dwellings pa) over the proposed 20-year plan period, a figure remarkably similar to that which is generated by application of the new standard methodology. The recommended changes were not incorporated by the Council into the Regulation 19 version of the plan and the

¹⁴ Proposed Reforms to the NPPF and Planning System – MHCLG August 2024 – Chapter 4 para.4

¹⁵ Ibid Chapter 2 – para.11

response paper forming part of the evidence base does not explain in any detail why the arguments were rejected, citing only the Housing Topic Paper as the basis on which the housing figure is justified. The rationale presented by that document was in place at the time of the Regulation 18 consultation and therefore, in essence the Council has simply ignored the case presented.

9.8 The views of Vistry and Taylor Wimpey have not changed, and the basis of the cases presented in April 2021 and December 2022 remain; the arguments are not reproduced herein, but remain as supporting submissions to these representations, because the Council has not answered the challenges presented in the submissions.

9.9 Importantly, in not departing from the position adopted at the time of each of the previous consultation exercises (that the Government/standard methodology sets the housing requirement), the Council may finally indirectly accept the veracity of the case that has been made on behalf of Vistry and Taylor Wimpey, once the new standard methodology is introduced.

9.10 As the MHCLG consultation document explains the new standard method responds in a far more focussed and targeted way to address the problems that are manifest in highly unaffordable district such as Winchester. The new methodology:

A) *uses a baseline set at a percentage of existing housing stock levels, designed to provide a stable baseline that drives a level of delivery proportionate to the existing size of settlements, rebalancing the national distribution to better reflect the growth ambitions across the Midlands and North;*

B) *tops up this baseline by focusing on those areas that are facing the greatest affordability pressures, using a stronger affordability multiplier to increase this baseline in proportion to price pressures; and*

C) *removes arbitrary caps and additions so that the approach is driven by an objective assessment of need.*

9.11 Rejection of household projections in favour of a baseline multiplier derived from actual housing stock overcomes the problem of perpetuating the 'baked-in' suppression of household formation rates that has plagued unaffordable areas for years. The new standard methodology addresses the inadequacies of the previous version and assessments of need that preceded it, such that there is now the real prospect that the step-change in housing supply demanded for years to address the national housing crisis may finally be achieved.

9.12 Winchester has maintained its position that the standard methodology is the appropriate arbiter of what a local plan housing requirement should be and therefore in due course will be required to accept that an appropriate starting point for housing supply within the district over a twenty-year plan period will be in the region of 20,000-22,000 dwellings. The 2040 plan falls significantly short of this requirement, demonstrating the absolute necessity of embarking on a new plan-making process as swiftly as possible once this process is concluded.

9.13 It is acknowledged that the planning authority is able, under the transitional provisions, to advance the 2040 plan against the objective of having the examination take place against the provisions of the December 2023 version of the NPPF. If the examination proceeds on this basis the resulting plan will include a housing requirement that is significantly below that required to address the structural deficiencies redolent within the local housing market area. Such a position must be swiftly rectified.

9.14 Aside from this fundamental objection to the foundation of Strategic Policy H1, which will be effectively out of date from the outset; there are other points of objection that militate against the housing requirement set by Policy H1.

- 9.15 The proposed plan period commences in 2020, which will be around five years prior to the point at which the plan is submitted for examination, meaning that 25% of the period covered by the document will have elapsed by the time the policies within are subject to scrutiny via the examination process. This would allow the Council to incorporate higher rates of delivery (arising largely from the MDA sites allocated within previous iterations of the development plan) into the supply trajectory, the consequence of which would be a lower residual requirement looking forwards and therefore avoidance of the need to allocate more land for housing development.
- 9.16 The Housing Topic Paper seeks to justify this approach by suggesting that if such an approach is not taken the 'over supply' would somehow 'be lost' from the overall equation of need vs supply. This contention fundamentally misunderstands the construction of the standard methodology, which considers past supply in applying the affordability adjustment (which responds to price signals in the market, which are in part a product of supply side factors).¹⁶
- 9.17 In simple terms local plans are supposed to plan for the future, not the past. The standard methodology also bases the affordability adjustment it applies on the most recent data, which is the median affordability ratio for 2023, published in March 2024. It is therefore appropriate that the starting year of any plan should be that upon which the affordability ratio is based, in this case 2024, which will be the year prior to which the examination takes place.
- 9.18 A start date of 2024 would allow minimum plan period of fifteen years to be achieved but would also signal, further, the need for an immediate review to provide the longer-term horizon advocated within these submissions.
- 9.19 Strategic Policy H1 makes provision for 15,115 dwellings over the twenty-year plan period (756 dwellings pa) based on a standard methodology derived figure of 13,565 dwellings (678 dwellings pa), an unmet needs allowance of 1,900 dwellings, and a reduction of 350 dwellings to account for supply within the district to be met within the South Downs National Park (SDNP) area. This should be a minimum figure.
- 9.20 The figure allocated as the Winchester district contribution to unmet housing needs that will arise within the Partnership for South Hampshire (PFSH) sub-region, which includes the southern portions of Winchester district is an unduly modest uplift to the baseline LHN figure. It will manifestly not address the scale of unmet needs that will arise within the PFSH area and is insufficient to address meaningful duty to cooperate engagement. Increased housing provision within Winchester will be required to address the level of unmet need that will arise.
- 9.21 The non-statutory strategic policy context for South Hampshire is set out in the PFSH Spatial Position Statement published in December 2023. The key points from the SPS are:
- The assessed housing need for the local authority areas within the PFSH area between 2023 and 2036 is approximately 78,500 dwellings.
 - The identified supply for 2023 and 2036 is only 64,909 dwellings (a shortfall of 11,771 dwellings).
 - The proposed approach for addressing the needs of authorities unable to meet their own housing needs in full is:
 - **Short / Medium Term:** Encourage East Hampshire, Eastleigh, Fareham, Test Valley and Winchester to exceed their housing need generated by the Standard Method.

¹⁶ NPPG - Paragraph: 006 Reference ID: 2a-006-20190220

- **Longer Term:** Ask East Hampshire, Fareham, Havant, Test Valley and Winchester to explore bringing forward development at the seven locations identified in the ‘Broad Areas of Search for Growth Assessments’ report (December 2023).

9.22 While a shortfall of 11,771 dwellings is obviously substantial, a review undertaken by Nexus of the evidence contained in emerging and adopted PFSH Local Plans (see **Appendix 1**) suggests that the real figure is significantly higher. The key considerations in this respect being:

- **New Forest, Eastleigh and Fareham:** These authorities adopted Local Plans in 2020, 2022 and 2023 respectively and have yet to undertake consultation on revised plans.
- **East Hampshire, Test Valley and Winchester:** These authorities are in the process of preparing new Local Plans and the documentation indicates that they will be able to accommodate their own housing needs.
- **Gosport, Havant, Portsmouth and Southampton:** These authorities are in the process of preparing new Local Plans and have confirmed that they are unable to meet their own housing needs. As indicated by the table below, the anticipated shortfall is **20,466 dwellings**.

9.23 As set out in the table below, the combined shortfall for the four authorities that have confirmed they are unable to meet their housing needs in full will increase significantly to **30,725 dwellings** with the introduction of the new standard methodology.

LPA / Plan Period	Latest Local Plan Consultation Document			Proposed Revisions to Standard Method		
	Housing Requirement	Housing Supply	Shortfall	Housing Requirement	Housing Supply	Shortfall
Gosport 2021 to 2038 (17 years)	5,576 dwellings	3,500 dwellings	2,076 dwellings	7,905 dwellings	3,500 dwellings	4,405 dwellings
Havant 2023 to 2043 (20 years)	10,320 dwellings	6,011 dwellings	4,309 dwellings	17,480 dwellings	6,011 dwellings	11,469 dwellings
Portsmouth 2020 to 2024 (20 years)	17,980 dwellings	13,603 dwellings	4,377 dwellings	21,960 dwellings	13,603 dwellings	8,357 dwellings
Southampton 2022 to 2040 (18 years)	26,500 dwellings	16,816 dwellings	9,684 dwellings	23,310 dwellings	16,816 dwellings	6,494 dwellings
		Total:	20,466 dwellings		Total:	30,725 dwellings

¹Proposed Revisions to Standard Method

9.25 It should be noted that the actual unmet need figure for the PFSH area as a whole is likely to be significantly higher than the shortfall indicated above because:

- **Gosport:** The Council has acknowledged that the plan period should be extended to 2040, increasing the shortfall by **930 dwellings**.
- **New Forest District:** The Council is embarking on a review of the 2020 plan, with initial consultation in 2025. The revised standard methodology figure for the district is 1,465 dwellings per annum, well in excess of the 521 dwellings per annum requirement in the adopted Local Plan. Given that the Council was unable to accommodate 460 dwellings on behalf of the National Park across the whole of the current plan period it

is unrealistic to expect that there would be no requirement for other PfSH authorities to accommodate a significant amount of unmet housing need on their behalf.

9.26 In terms of the potential for partner authorities to contribute to accommodating the unmet need, analysis provided at **Appendix 1** indicates that the following PfSH authorities will have capacity to accommodate some of the unmet need:

- **East Hampshire:** The most recent Local Plan consultation document indicates there is willingness to help address unmet needs on behalf of other PfSH authorities. Discussions are underway with Havant and Portsmouth.
- **Fareham:** The recently adopted Local Plan included an allowance of 900 dwellings to help address unmet needs of neighbouring authorities (including 800 dwellings for Portsmouth). This indicates the Borough is likely to have capacity to accommodate further unmet need in the future under a version of the NPPF that mandates housing delivery across strategic planning areas.
- **Test Valley:** The most recent Local Plan consultation document indicates a willingness to help address unmet needs on behalf of other PfSH authorities.

9.27 Notwithstanding that assessing the exact capacities of East Hampshire, Fareham and Test Valley to accommodate unmet needs is beyond the remit of these representations, it is important to note that the level of unmet need that will need to be disaggregated between these authorities is substantial, and significantly greater than has been contemplated to date.

9.28 In this context the 900-dwelling provision in the Fareham Local Plan and the 1,900 dwelling allowance identified within the 2040 plan are significantly below the future provision that will be required. Currently, the aggregated figures achieve less than 14% of the unmet need arising in Southampton, Portsmouth, Gosport, and Havant, falling to less than 10% against the new standard methodology.

9.29 The PfSH Spatial Position Statement published in December 2023 suggests that the longer-term solution to meeting housing needs is to ask East Hampshire, Fareham, Havant, Test Valley and Winchester to explore bringing forward development at the seven locations identified in the 'Broad Areas of Search for Growth Assessments' report from December 2023. However, the total quantum of development that could be accommodated in these locations (9,700 dwellings) is also far short of the amount needed to address the level of unmet need that will arise.

9.30 It is clear from the Statements of Common Ground ('SOCG') published alongside the Regulation 19 consultation document that both Havant and Portsmouth (two of the four PfSH authorities unable to meet their own needs) consider the contribution of 1,900 dwellings towards the unmet needs to be insufficient. Key points being:

- **Havant:** The SOCG states:

"As part of this formal letter, and within Havant Borough Council's representations on the Draft Winchester Local Plan (Regulation 18), it was noted that a buffer is provided to contribute to the PfSH shortfall. The letter confirmed the Council's position of concern that in the absence of a Joint Strategy which shows how the development need of the South Hampshire sub-region will be met in full, there is no clear mechanism to address the significant need arising from Havant and the wider sub-region.

At the time of publication of this interim SoCG, Havant Borough Council has not reviewed the Winchester City Council Proposed Submission Local Plan (Regulation 19). It will do so as part of the 6 week public

consultation that started on the 29 August 2024. Nonetheless, whilst WCC has responded to the March 2024 request, this did not contain an offer to accommodate the unmet need from Havant Borough nor an offer to engage regarding the preparation of the Winchester Local Plan. No other offers were received from other local authorities. As such there is an unmet housing need of 4,309 remaining at the point of signature of this interim SoCG.

Havant Borough Council notes that there has been no engagement between the Regulation 18 and Regulation 19 stages from Winchester City Council to address the matters raised in earlier representations or the letter of 5th March 2024. Havant Borough Council is mindful that the NPPF indicates that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for.

Given the circumstances above, whilst Havant Borough Council will undertake a full review of the Winchester City Council Proposed Submission Local Plan (Regulation 19) as part of the 6-week public consultation, it reserves the right to raise concerns regarding the soundness and legal compliance of the plan through the consultation and examination. This would include amongst other matters consideration of whether the Duty to Cooperate can be considered to be met."

- **Portsmouth: The SOCG states:**

"PCC considers that WCC should identify specific sites in its Plan to help meet the unmet need of the city and other LPAs as necessary. Relevant sites should be located close to the boundaries of the relevant LPAs and within the relevant housing market area."

9.31 It is notable that SOCG's do not yet appear to have been agreed the other two PFSH authorities unable to meet their own housing needs (Gosport and Southampton). However, it is reasonable to assume that their views on the level of contribution towards unmet need will be similar.

9.32 In terms of Winchester specifically, preparation of a new local plan provides an opportunity to address unmet needs arising within the PFSH area in the part of the district that is closest to where the need arises and which, by the Council's own admission, has a strong functional relationship with the urban areas to the south. While there is limited scope for the intensification or expansion of the existing commitments that lie in this part of the district, and understandable reluctance on the part of Parishes and residents to countenance further MDA style urban extensions or new communities around these fringes, it would be sensible and appropriate to assign the existing committed growth, and minor extensions proposed in the SHUA part of the district to meeting the shortfalls that will arise within the wider PFSH area.

9.33 This would not require further land to be developed within these marginal areas, eroding the levels of separation achieved or denuding areas of green space, it would merely require that the 'core' housing requirement to be provided for by the Local Plan (derived from use of the SM/LHN) is met elsewhere in the district beyond the SHUA area. This would be via an increase in the level of growth assigned to Winchester Town, which quite apart from considerations relating to the level of unmet need arising from the PFSH area, would positively meet other key objectives and structural challenges faced by the Local Plan, which are addressed elsewhere in these representations.

9.34 The figure of spatial strategy could be reapportioned to anticipate pressures that will arise in accordance with the duty to cooperate. Such a response to a very particular and credible 'threat' to the Council's strategy could be determined without fundamentally changing the broad parameters of the proposed spatial strategy, which

could continue to be based on the three broad spatial areas, but with a reassignment of their roles: the SHUA area would be approached principally as a repository area to accommodate the unmet needs of the partner authorities in South Hampshire, while the remaining areas (Winchester Town and the MTRA) would address local housing needs generated by the standard methodology.

- 9.35 In following such an approach, the SHUA commitments and allocations at West of Waterlooville/Newlands and Whiteley – 5,650 dwellings - could be assigned to accommodating unmet needs arising within the PfSH area.
- 9.36 This would necessitate a corresponding increase in the housing requirement for Winchester Town, creating greater opportunity for people to live and work in close proximity by delivering housing to meet the needs of those workers currently commuting into Winchester from the PfSH area on a daily basis. Increasing supply at Winchester Town would facilitate the creation of supply ‘headroom’ within the PfSH area, therefore responding to the unmet need that is forecast to arise indirectly through provision of housing for in-bound Winchester commuters who reside currently in the PfSH area.
- 9.37 **Strategic Policy H2 – Housing Phasing and Supply** provides a suggested approach to housing delivery based on the proposed housing strategy, the principal components of which are already committed via allocating policies (largely MDA policies) contained in the adopted Local Plan, and the significant unplanned contribution expected from windfall sites. The supporting text notes that the new Plan can therefore exert no control over these sources of supply, which are expected to be developed in the first half (sic) of the plan period, 2020-2030 (in effect within five years of the plan being adopted).
- 9.38 The intention is therefore to impose a policy that prevents green field development sites from coming forward before April 2030 and thereafter to allow annual supply to fall generally year-on-year from around 2025-26, shortly after the plan is scheduled to be adopted¹⁷. During the early years the graph indicates that supply will exceed the annualised rate of provision across the plan period (755 dwellings pa) and then fall consistently from around 2034/35. It is notable that under the proposed strategy of the 2040 plan, which does not pursue an ambitious allocations policy, that from the likely date of adoption (2025/26), supply is consistently well below the threshold of 1,000 dwellings per annum, which would need to be exceeded annually to meet the minimum housing requirement for the district under the new standard methodology.
- 9.39 As contended throughout these representations, the future development plan strategy should focus on allocating MDA scale development at Winchester to ensure that sufficient housing is provided to address the structural challenges that exist and to provide continuity of supply. As already evidenced by the examples of Whiteley, Waterlooville, and Barton Farm, MDA developments have longer lead times compared to smaller non-strategic sites (although the experience locally in respect of these three examples is not typical due to unusually protracted land assembly and ownership constraints) and therefore naturally phase themselves over a plan period without the need to impose artificial restrictions, which are not supported by national policy.¹⁸ The introduction of new strategic scale development in the form of successor MDA allocation(s) would provide for continuity of supply over an extended plan period, picking up delivery as the committed MDA sites move towards completion, offering certainty and predictability of housing supply. It is vital that purposive planning at scale is undertaken via the immediate review of this plan. The land controlled by Vistry and Taylor Wimpey would provide a highly sustainable and compatible MDA scale allocation to the north of Winchester, building upon the successful allocation of land at Barton Farm.

¹⁷ Winchester District Local Plan 2020-2040 Effect of Phasing on Housing Trajectory page 218

¹⁸ NPPF – Chapter 11: Making Effective Use of Land (December 2023)

- 9.40 The Council's proposed phasing policy would not be necessary in the form proposed if a proactive and coordinated MDA policy is incorporated into the Local Plan.
- 9.41 **Policy H3** describes the proposed spatial apportionment of housing in accordance with the spatial strategy, which is critiqued within wider submissions to the 2040 plan. Vistry and Taylor Wimpey disagree that the proposed spatial strategy and resultant distribution are sound, due to the failure to prioritise growth at Winchester and by maintaining a strategy that assigns a significant component of the 'core' housing requirement for Winchester derived from the standard methodology to the South Hampshire areas of the district. This serves to continue with an approach that has its origins in regional planning guidance (RPG9), that was continued with greater prescription by the long since revoked Southeast Plan. The South Hampshire Sub-Regional Strategy Area included the southern parts of Winchester district within the sub-region, pursuant to the provisions of Policies H1, H1a, H1b, and SH1, which allocated development to this area specifically. The adopted Local Plan and the emerging 2040 Plan largely continue this spatial response. While the spatial rationale has merit and may well be returned to in due course via future revisions to the planning system, the regulatory framework has changed.
- 9.42 Regional planning was revoked by the Coalition Government, and through the advent of the duty to cooperate introduced via the Localism Act, the requirement to plan strategically across local authority boundaries is most often carried out with an obligation only relating to process rather than outcomes. Quantified spatial prescription exists now only in respect of individual planning authority areas, via application of the standard methodology, with a duty to discuss the accommodation of unmet housing needs from outside imposed by S.33A.
- 9.43 As is widely understood, the obligation to make provision for housing from other local authority areas is not mandatory, only the requirement to cooperate in examining the capacity to meet such needs is obligatory. The extent to which cooperation has genuinely taken place is a matter of compliance that can result in failure of emerging plans at examination if sufficient consideration has not been given. As noted above, the duty to cooperate is concerned with process rather than outcome and consequently can be circumvented in terms of providing for the proper strategic planning of an area. Even where some regard is had to the duty, which Winchester City Council will assert is the case with the 2040 Plan, there is unlikely to be an effective response that fully addresses unmet needs (see response to Policy H1).
- 9.44 As highlighted in the response to Policy H1, Winchester is one of the partner authorities able to identify land that could make a significant contribution to addressing the levels of unmet need that are, and will be, manifest. Having regard to the spatial arrangement of the district it would make obvious sense to treat the southern areas – the South Hampshire Urban Areas (SHUA) – as defined locations to meet the unmet needs that will arise in Havant, Portsmouth, Southampton, Gosport, and potentially other PFSH areas. Rather than treating housing that is already committed and due to be allocated in the SHUA area as contributing to meeting the 'core' minimum requirement for Winchester generated by the standard methodology, it would be more appropriate to assign it to meeting unmet needs from the PFSH area given the spatial and functional characteristics. Additional housing could then be allocated around Winchester, including the land to the north of Wellhouse Lane, and potentially elsewhere, in accordance with sustainable development objectives, to address the quantum of housing to meet locally arising needs generated by the standard methodology.
- 9.45 The contention at paragraph 9.27 of the 2040 Plan that Winchester Town is heavily constrained is not accepted. Compared to partner authorities to the south the undeveloped areas around Winchester are unaffected by national/international designations that would preclude development. Previous submissions to the Regulation 18 consultation stages have alluded to this situation and have provided evidence in support of the contention.

9.46 **Policy H6** – Affordable Housing provides the latest policy response to the ‘key priority’ identified earlier in the 2040 plan. The challenge of providing sufficient levels of affordable housing to meet needs arising within Winchester district and at Winchester Town specifically has been a long established and chronic problem that remains unresolved. Reference to past rates of delivery shows that policy ambitions are not being realised:

Winchester District Affordable Housing Requirement/Delivery 2011-21 (AMR/SHMA – WCC)

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	Totals
Total	314	204	487	227	430	578	560	819	627	798	1141	1044	7,229
Total AH	71	68	149	82	92	153	169	283	142	300	511	382	2,402
% AH	23%	33%	31%	36%	21%	26%	30%	35%	23%	38%	45%	37%	33%

9.47 The delivery of affordable housing across the district since 2011 has consistently fallen short of the Council’s policy objectives, and only once in the last twelve years has affordable housing supply as a component of overall supply exceeded 40%. The average over this period has been 33%.

9.48 The Council began examining affordable housing delivery against the adopted spatial strategy in its 2020/21 AMR, which shows the MDAs (policies W2, SH2 and SH3) delivered 158 of the 300 affordable homes constructed that year, 53% of the affordable housing completions in the district.

9.49 Across the three MDAs an average of 43% of new homes delivered have been affordable, compared to just 22% at Winchester Town, and 36% within the MTRA demonstrating clearly the comparative effectiveness of the MDA strategy.

9.50 The paragraphs preceding Policy H6 recognise and assess the problems faced by those trying to access the housing market in Winchester and note at paragraph 9.31 that the affordability of housing in Winchester district continues to be a major issue..therefore the delivery of affordable homes remains a critical priority. These statements naturally provoke the question: what therefore does the Council propose to do about this issue in policy-making terms that differs from the measures that have been taken before that have demonstrably failed to resolve the major/critical issue that the Council recognises and classifies as a ‘key priority’ it must tackle through the policies of this new Local Plan?

9.51 The supporting text notes that viability is a key factor in securing delivery and that national policy now requires viability to be taken into consideration when formulating policies that require affordable housing provision. The Council’s own evidence in this regard, referred to in paragraph 9.45 of the supporting text, notes that larger sites will be more able to deliver affordable housing, and that a proportion of 40% should be achievable above the threshold. Notwithstanding, a range of caveats are applied identifying circumstances that may militate against provision in line with the need that exists. Policy H6 is then constructed to impose different levels of expected provision according to site characteristics.

9.52 Noting that the Council has identified affordable housing delivery as a major/critical priority in policy making, Vistry and Taylor Wimpey highlight the far greater propensity of large MDA scale developments to deliver affordable housing. As has been consistently advocated throughout successive sets of representations to the emerging local plan, the most effective means available to the Council to address the major/critical/chronic problem associated with the affordability of housing within the district is to allocate a greater proportion of new housing to major housing sites, in preference to a pronounced reliance on small sites/windfall sites, which often

fall below the threshold for delivery of affordable housing, as key components of the district housing strategy. Small housing sites and previously developed sites, as recognised by the latest iteration of the H6 affordable housing policy, are subject to greater viability challenges and so are less likely to deliver affordable housing, or to do so in quantities that meet the overall objective to tackle this major/critical issue.

10. Development Allocations

10.1 The representations submitted in response to the 2040 Local Plan consultation should be read together and treated as overarching commentary on the strategy of the Plan. Vistry and Taylor Wimpey do not consider that the 2040 Plan is founded upon a soundly based development strategy that is consistent with the key objectives and priorities that the Council has described as central to its plan-making purpose.

10.2 Chapter 12 of the plan sets out the development allocation policies relating to Winchester. Submissions made to the Regulation 18 consultation stage in autumn 2022 included two supporting reports submitted as appendices to the representations, outlining the case in favour of creating a new Northern Neighbourhood for Winchester on land to the north of the Kings Barton MDA, and a SHELAA assessment report explaining why the land is the most appropriate option for future strategic growth at Winchester Town. These submissions remain valid and relevant to the future examination of this plan. They are not re-submitted to this Regulation 19 consultation but may be cited in support of submissions at a future hearings stage.

Development Allocations - Winchester

10.3 The supporting introductory text at paragraph 12.2 characterises Winchester as a unique place (a description that could be applied to any town or city in the country) which benefits from a series of exceptional characteristics in terms of historical and cultural value, set within some of the most beautiful landscape in the country.

10.4 As noted elsewhere in these submissions, while Winchester is undoubtedly an important historic and cultural centre with many valuable assets it is far from unique in this respect with numerous towns and cities across the country also characterised by heritage and cultural assets of great importance. This is not to undermine the quality of the place, but to recognise that there are other towns and cities that must also balance the desire to conserve and protect against the need to flourish and grow, to accommodate contemporary needs socially, culturally, and economically.

10.5 The landscape surrounding Winchester while attractive and rich in places, is varied in terms of its quality. While to the east the National Park is of undoubted significance and beauty, the countryside setting to the north, particularly; to the west, and to the south is not marked out specifically or recognised as being nationally significant. If this was the case, it would be reasonable to expect that nationally significant landscape designations would apply, denoting the importance that the Draft Plan attests.

10.6 Vistry and Taylor Wimpey are not seeking through these representations to deny that the landscape setting of the town is attractive, or in places possesses important qualities that are worthy of preservation. However, it is important not to overstate the importance, or to confer undue constraint, because this will preclude necessary development from taking place; stifling the growth and change that the Draft Plan asserts is necessary and therefore perpetuating the status quo.

10.7 The table provided on page 307 illustrates the limited strategic planning ambition for Winchester that is proposed by this plan. Having stated in the evidence base and in the plan that Winchester is the most sustainable settlement in the district (paragraph 9.27), the level of growth planned for is unduly limited:

10.8 Most of the growth that is listed is in the form of already committed development, or is simply rolled forward (58%):

- Completions 879
- Outstanding permissions 328
- Barton Farm (W1) 1,541
- Central Winchester Regeneration (W7) 300
- Station Approach (W8) 250

- 10.9 Moreover, after the rolled forward MDA at Barton Farm/Kings Barton the next largest component of housing land supply at Winchester occurs in the form of windfalls (18%), which by their very nature are unplanned. This means that 76% of the dwellings identified as forming the Local Plan housing supply at Winchester are not newly arising, planned developments. This demonstrates that the 2040 plan is lacking both the ambition and positive intent to address the key strategic challenges that the document claims are of critical importance to the Council.
- 10.10 **Policy W1** relates to the Barton Farm MDA (known as Kings Barton), which is carried forward from the adopted Local Plan. Vistry and Taylor Wimpey support the allocation and advocate strongly that development to the north of Wellhouse Lane on land they control would provide a compatible, sustainable, and cohesive extension to the existing MDA; the 2040 Plan and any future revisions to the development plan should build upon the opportunity it presents to create a greater sustainable, integrated, northern neighbourhood, the case in favour of which was advanced at Regulation 18 stage on behalf of Vistry and Taylor Wimpey (see above).
- 10.11 In this regard attention is drawn to the 'Winchester Town' and 'Wider Context' plans pp. 308, 309 respectively). These show the 'carried forward' Barton Farm MDA and the Sir John Moore Barracks 'New Site Allocation' on the Winchester Town plan. The Wider Context plan on p.309 allows for these allocations to be appreciated better in the context of the wider setting of the urban area, demonstrating that, when taken together with the land controlled by Vistry and Taylor Wimpey immediately to the north, and contained by the line of the A34, there is an obvious and spatially cohesive major development opportunity that exists at Winchester.
- 10.12 The wider context plan shows quite clearly that the urban area has expanded historically to the east beyond the floodplain of the river Itchen up to the line of the M3/A34 that extends northwards from junction 9. The road infrastructure functions as an obvious containment barrier delimiting the potential future extent of the urban area. Embracing this opportunity would allow the Council to positively address many of the challenges that it identifies within the 2040 plan through visionary, long term strategic planning of the town. This plan has not taken up this opportunity.
- 10.13 A future spatial strategy prepared in accordance with the objectives of the new NPPF should be based on a long-term development strategy that positively embraces comprehensively planned strategic growth at north Winchester.
- 10.14 Policy W1 includes a range of criteria that could readily be applied to an allocation of the land to the north of Wellhouse Lane, notably the requirement (i) to create: *A distinctive, well-integrated suburb of Winchester Town, which respects its local context, and enhances the standards of sustainable design in the locality.*
- 10.15 The design coding and reserved matters approvals that govern the delivery of the Barton Farm site were approved by the local planning authority and therefore can be assumed to meet this principal criterion of the policy. There is no reason why a carefully crafted policy allocating the land to the north, similarly as an MDA, could not achieve development of equal quality, but with provisions tailored specifically to meet the current challenges faced by the Council in combatting climate change. Barton Farm serves as a blueprint for what could be achieved on the land to the north of Wellhouse Lane, in respect of which the Council could exert full policy control if the opportunity to allocate the site is taken.

- 10.16 **Policy W2** – Sir John Moore Barracks is the most significant new allocation proposed at Winchester Town within the Draft Local Plan, with a dwelling capacity assumption of 900 homes applied; it is placed third in the hierarchy of contributions to housing delivery at the town behind the residual component of Barton Farm (1,541 dwellings) and the windfall allowance (1,035 dwellings). However, there remain uncertainties surrounding the availability of the site and its potential capacity, as demonstrated by the terms of the draft policy. Such uncertainties limit the potential of the site to make a meaningful contribution to housing land supply in the early years of the plan period and therefore to make any meaningful contribution to achieving a robust five-year housing land supply.
- 10.17 In identifying this site as the only new major planned component of housing supply at the principal and most sustainable settlement in the district, the Council is inviting a significant risk factor into the deliverability of its entire housing strategy. In the context of a pressing affordability crisis, a declared climate emergency driven in large part locally by transport related carbon emissions, the Council should be pursuing a robust, certain, strategically-scaled policy response that is able to guarantee continuous housing delivery.
- 10.18 Instead, the Council has chosen to identify an operational military facility as the only new strategic residential site at Winchester. The site was identified initially following a review of the Defence Estate that took place in November 2016 aimed at significantly rationalising and reducing the scale of military infrastructure arising out of the 2015 Strategic Defence and Security Review (SDSR). Much has changed in the period since these studies were commissioned.
- 10.19 In November 2016 it was estimated that the Sir John Moore site would be vacated in 2021. That date has now been revised to 2026, with the House of Commons database relating to the disposal programme for the Defence Estate currently describing the status of the site as being under ‘assessment’. The team acting for the DIO promoting the site as a development opportunity forecast in December 2020 that a planning application for redevelopment would be made in 2021, with on-site delivery occurring from 2022. This timetable has clearly been superseded. The DIO project website now indicates that the site is due to be vacated in 2026, although any reference to a timetable for a planning application has been removed. A conceptual sketch masterplan (Stage 3) (September 2024) shows the current position. There is high level supporting information but limited clarity as to the precise nature of the development that is planned.
- 10.20 The reliance placed on this site as the only new strategic residential allocation at Winchester within the 2040 Plan is disproportionate. If the plan to vacate the facility remains in place the site provides a realistic growth opportunity. However, should the decision to decommission the base be revisited the opportunity is called into question. Plan-making should provide certainty and should be based on policies that are ‘unambiguous’, on which basis there should be clarity when sites are identified that they will be both available for development and able to contribute as expected in a timely manner in the prosecution of the strategy upon which the plan is based. When such sites are intended to perform as the main strategic residential allocation at the principal settlement, it is reasonable to expect that the land will be available.
- 10.21 This level of certainty is not achieved in respect of the Sir John Moore Barracks site. The Council should not be relying on this site as the key new component of its housing strategy for Winchester Town. Questions about the availability of the site apart there are other significant factors that compound this view when the supporting text to the draft policy is scrutinised.
- 10.22 Attention is drawn particularly to several factors identified by the Council from paragraph 12.14 onwards:
- Half of the site lies within the NE7 settlement gap the objective of which is to maintain separation between Littleton and Winchester (12.14, 12.23)

- The site is obviously contained and separate from surrounding land uses being fenced, screened, and secured commensurate with its use as a military base (12.16 – 12.18)
 - The site contains a SINC and is adjacent to the Littleton Conservation Area (12.19)
 - There is no clarity provided on how the site will be developed, or the areas that will be incorporated into the settlement boundary highlighting the sensitivity of the location, the propensity for harmful coalescence to take place, and the lack of understanding that exists regarding the true potential of the opportunity (12.26)
 - The site has potential historical significance as a military facility dating from WW1 (12.16, 12.27, 12.28)
 - There is landscape, biodiversity and conservation value to the site (12.19)
 - A masterplan will be required to demonstrate how any scheme could respond sensitively to the constraints that exist – settlement gap, sensitive countryside location, military history/historical significance (12.26, 12.27)
 - The masterplan should demonstrate how strong integration can be achieved for pedestrians, cyclists and public transport (12.29)
- 10.23 The characteristics that are highlighted show that the opportunity that exists for development is far from certain; most importantly in terms of the availability of the site for development at all, the timetable for the departure of military personnel being unclear; and in respect of the potential of the site to provide a cohesive, integrated, and well-connected neighbourhood that respects its sensitive setting,
- 10.24 The characteristics that apply to the site, notably its high degree of containment and separation from surrounding land, suggests that it would be extremely difficult to integrate new homes and facilities with neighbouring development, without dramatically altering the landscape setting of the site (a factor afforded significance in initially selecting the site for development). Development would also undoubtedly compromise the integrity of the settlement gap between Littleton and Harestock protected under the terms of **Policy NE7**. In this regard the Littleton Gap is a long-established policy tool carried forward through successive plans that would be greatly compromised if the site is comprehensively developed.
- 10.25 The range of sensitivities and uncertainties highlighted within the supporting text to the policy demonstrate that the level of reliance placed on the Sir John Moore Barracks site is premature at this stage. While there may be future development potential, the Council should not be relying on the site as the core new component of its housing strategy for Winchester Town.
- 10.26 Noting the lack of clarity surrounding the future of the military facility it would be more robust to treat it as a potential opportunity/contingency site, the potential of which should be treated as uncertain in the context of a defined allocations strategy. Should the status of the site become clear during the plan period, it could be developed as a parcel of (partially) previously developed land that is an adjunct to the housing strategy for the Winchester Town area. Vistry and Taylor Wimpey recognise that if the site becomes available for development during the plan period, it would be appropriate to investigate its potential for supplementary residential, or other alternative non-military uses as part of the development of a new northern neighbourhood for Winchester, subject to the multiple constraints identified by the Draft plan being successfully resolved.
- 10.27 However, it is not appropriate to treat the site as the main new strategic development opportunity that underpins the housing strategy of the new Local Plan. The land controlled by Vistry and Taylor Wimpey to the north of Wellhouse Lane is suitable, available, and achievable in the context of the proposed plan period and, in accordance with submissions made at Regulation 18 stage, would provide a more certain strategic development opportunity on which the spatial strategy of the Local Plan could be based. The numerous caveats applied to the draft policy show that this is an entirely reasonable and proportionate conclusion to draw.