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Winchester District Local Plan

Winchester City Council Local Plan Examination

Hearing Statement Matter 3:

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

April 2025



Winchester
City Council

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

Issue 1: Whether the Vision and strategic policies SP1, SP2 and SP3 are positively prepared, justified, effective and consistent with national policy.

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General Matters

1. Having regard to NPPF 21, does the Plan make clear which policies should be regarded as ‘strategic policies’ and would they constitute a clear strategy for the pattern, scale and quality of development in the District?

WCC response:

1.1 Strategic policies are clearly identified within the Plan, explicitly titled in both the contents section and within the policies themselves. All policies outlined in the Introduction are strategic, and within each topic area, Strategic Policies are positioned at the beginning of the topic to set out overarching principles. The Proposed Submission Local Plan (Regulation 19) includes the following Strategic Policies: SP1, SP2, SP3, D1, D2, D3, D4, D5, CN1, T1, NE1, HE1, HE5, H1, H2, H3, E1, E2, E3 and E4.

1.2 These policies play a key role in delivering the Plan’s vision, establishing a clear spatial strategy and guiding approaches to housing, community development, the economy, and transport. Additionally, they place a strong emphasis on sustainable development and the protection of both the natural and historic environment.

Table of Strategic Policies and if they response to scale, pattern and/or quality of development:

Policy	Scale	Pattern	Quality
SP1	Yes	Yes	Yes
SP2	Yes	Yes	Yes
SP3	Yes	Yes	Yes
D1	No	No	Yes
D2	No	No	Yes
D3	No	No	Yes
D4	No	No	Yes
D5	No	No	Yes
CN1	No	No	Yes
T1	No	Yes	Yes
NE1	Yes	Yes	No
HE1	Yes	Yes	Yes
HE5	Yes	No	Yes
H1	Yes	Yes	No
H2	Yes	Yes	No
H3	Yes	Yes	No
E1	Yes	Yes	Yes
E2	Yes	Yes	No
E3	Yes	Yes	Yes
E4	Yes	Yes	No

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

WCC response:

- 1.3 The Council's latest Local Development Scheme ([ED16](#)) dated February 2025 anticipates the adoption of the Local Plan in Autumn 2025. Subject to the progress of this examination, this remains realistic and an end-date of 2040 would give 15 years from adoption (NPPF paragraph 22).
- 1.4 In any event, planning authorities are required to maintain up to date local plans and the City Council propose to commence an immediate review of the Local Plan following its adoption. This Local Plan, will therefore, be subject to early review and that will provide the opportunity to address longer-term needs, as may be required by the new NPPF. Since the Local Plan was submitted for examination the [Chief Planning Officer](#) has contacted all Local Planning Authorities and requested that they agree an updated LDS by the 6th March 2025. An updated LDS ([ED16](#)), which replaces document SD11 was agreed at a [Cabinet meeting on 12 February 2025](#) that fulfilled this requirement by outlining a clear and realistic timetable for the adoption of the Proposed Submission Local Plan (Regulation 19) that is the subject of this examination and it also covers the production of the next Local Plan following that.
- 1.5 Regarding the start date, in the absence of any NPPF or PPG requirements about the start date, it is for the planning authority to choose a suitable date. Apart from the fact that local plans in the District typically use a 20-year plan period, 2020 also aligns well with the date of key 'needs' studies that form part of the evidence base. The original Strategic Housing Market Assessment (SHMA), Employment Land Study, Retail Leisure and Town Centre Uses Study, and the Transport Assessment Stage 1 were all published in 2020. While it has been necessary to conduct partial updates of this evidence to maintain its relevance, the 2020 studies informed the Strategic Issues and Priorities (SIP) consultation in 2021 and the subsequent development of the Local Plan. Paragraphs 3.5 to 3.8 of the Housing Topic Paper update ([ED02](#)) provide further explanation.

Policy SP1

- 1. The Plan sets out a vision and objectives to tackle climate and nature emergencies and create a greener District, living well, homes for all and a vibrant local economy. Those are given effect through Policy SP1. In so doing would that Plan be effective? Should the Plan objectives be incorporated within the Plan's strategic policies?**

WCC response:

- 1.6 The Vision and Objectives have been prepared to provide a clear vision and framework for the Plan area. They have directed and informed the policies of

the Plan. The Vision sets out a clear spatial vision for each of the three defined areas within the Plan area. This is then followed throughout the Plan including in policies D2 to D4.

1.7 Overall, it was considered appropriate for the Vision and Objectives to be included as a specific policy in the Plan, to ensure there was a clear read across from the Vision and Objectives to development outcomes.

1.8 The Objectives have informed the production of the Plan’s policies. The objectives set out targets for each of the themes of the Plan, and primarily relate to each chapter as set out in the table below.

Plan Objectives	Local Plan Chapter
Tackling the climate and nature emergencies and creating a greener district	Carbon Neutrality and Designing for Low Carbon Infrastructure Biodiversity and the Natural Environment
Living Well	High Quality Well-Designed Places and Living Well Sustainable Transport and Active Travel The Historic Environment
Homes for All	Homes for All
Vibrant Local Economy	Creating a vibrant economy

1.9 The Objectives set out what the Council is trying to achieve with the Plan – the policies set out a framework for guiding development to deliver that. The Plan’s policies have their own monitoring framework as set out on pages 502-526 of the Proposed Submission Local Plan (Regulation 19). It is therefore considered there is no need to repeat the objectives in the policies themselves.

Policy SP2

1. Given the transitional arrangements set out in NPPF December 2024 paragraphs 234-236) would a modification requiring a Plan review within a stated timescale be clear and effective? Given the above national policy would such a modification be necessary for soundness?

WCC response:

1.10 Yes to both questions. The Council has proposed modifications to the Plan (PM2 and PM3) in the Schedule of Proposed Modifications ([SD14a](#)) which make clear the intention to review the Plan. Since the submission of the Plan the Council has approved a Local Development Scheme ([ED16](#)) in February 2025 to put this into effect.

2. To accord with national policy at NPPF paragraph 60, to boost significantly the supply of homes, should the numbers expressed in policy SP2 be stated as minimums?

WCC response:

1.11 Paragraph 60 of the 2024 NPPF confirms the Government's objective of significantly boosting the supply of homes. This Plan does so through the identification of significant new allocations to meet housing need and additional development in response to unmet need in neighbouring authorities. The Plan also allows for the proposed allocations and windfall to be supplemented by affordable housing rural exceptions schemes under proposed policy H7.

1.12 The level of housing development in Policy SP2 (and Policy H1) are described as "about" 5,640 homes in Winchester Town, 5,650 in the South Hampshire Urban Areas and 3,850 in the Market Towns and Rural Area. This follows the approach taken in policies WT1, SH1, MTRA2 and others in adopted Local Plan Part 1 ([LP02](#)) and the site allocations in adopted Local Plan Part 2 ([SD04](#)). This has proved to be an appropriate basis for considering the development potential of site allocations and the likely level of development which will come forward in each sub area. It demonstrably has not restricted the development potential of allocations as and when they have come forward, nor has it prevented the housing targets in the adopted plan from being exceeded, given that completions during the period covered by Local Plan Part 1 (2011 to 2024) of 8,810 have exceeded the adopted plan target of 7,300 by 1,510 dwellings.

1.13 It is considered that expressing the figures in Policy SP2 as minima would not change the approach to delivery in the Plan nor the approach to considering the development potential of each site as it comes forward for development. But it would lead to greater uncertainty for all parties, including service providers such as utility companies with whom the Council has engaged regarding infrastructure capacity and anticipated housing delivery.

3. Policy SP2 sets out housing targets for the three spatial areas in the District. In so doing, does it provide appropriate support for employment uses to meet local needs?

WCC response:

1.14 Strategic Policy SP2 sets out the spatial strategy of each of the Plan sub areas identified in the local plan Vision. The policy sets out the nature of economic growth envisaged for each sub area. Subsequent policies in the Plan then provide further detail on the approach to delivering growth. Strategic Policy E1 sets out the Plan's approach to the economy. Strategic Policy E2 sets out the spatial distribution of economic growth for each sub area, and identifies the locations within each area where new growth can be accommodated. Policies E6 (Retaining Employment Opportunities) and E9 (Economic Development in the Rural Area) also contribute to the strategy.

1.15 Taken together, these policies are considered to provide appropriate support for employment uses to meet local needs. Therefore it is considered that Policy SP2 provide appropriate support for employment uses to meet local needs.

Policy SP3

1. Does the policy strike the right balance between protecting the countryside and promoting development to meet local needs? Should the policy explicitly recognise the sustainability of locations immediately adjacent to existing settlement boundaries or previously developed land;

WCC response:

1.16 The development strategy contained in the Plan, including the allocation of new sites, has already taken into account the sustainability of locations and presence of Previously Developed Land (PDL) as set out in the Development Strategy and Site Selection Background Paper ([SD10c](#))

1.17 There is a need to give communities and all parties a level of certainty when considering development proposals outside of the settlement boundaries. The city council considers that if there was a general promotion of development on sites that were adjacent to the settlement boundary or previously developed land (PDL), this would undermine that certainty, and potentially undermine other aims of the Plan including the retention of employment land and delivery of rural exception affordable housing schemes.

1.18 Instead, Plan policies NE2, H4, H7, H12 and E9 to E11 all provide for development within the countryside which enable the merits of the sustainability of locations or presence of PDL to be considered as and when proposals come forward.

2. Would policy SP3 accord with NPPF paragraph 89, which states that' ... The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.'?

WCC response:

1.19 Policy SP3 explicitly allows for previously developed land, and sites that are physically well-related to existing settlements, where they have come forward under the various circumstances set out in criteria i to vii as outlined in the answer to the previous question. In particular, criterion iii encourages the reuse of suitable buildings in the countryside and Plan policies NE2, H4, H7, H12 and E9 to E11 all provide for development within the countryside which

enable the merits of the sustainability of locations or presence of PDL to be considered as and when proposals come forward.

3. Should the countryside designation afforded by policy SP23 remain on sites allocated for development in the Plan?

WCC response:

1.20 Yes. Many of the proposed developments in the Plan are on large sites, where the disposition of uses cannot be defined at present (e.g. Sir John Moore Barracks). In those cases the intention is for future iterations of the Plan to update the settlement boundary as required when the exact layout of those development sites is determined. To accommodate this situation, Policy SP3 criterion i seeks to make it clear that development proposed in this Plan or made neighbourhood plans will be permitted on land currently outside the settlement boundaries.

4. Does policy SP3 provide for the particular locational needs of essential infrastructure such as water and waste water infrastructure in accordance with PPG? Should it state that development should not increase flood risk and assessed any potential loss of the best and most versatile agricultural land?

WCC response:

1.21 The Council request two proposed modifications (PM4 and PM5 in SD14a) in relation to the wording of policy SP3 to ensure that the policy provides for the particular locational needs of essential infrastructure in accordance with the PPG, flood risk and the potential loss of the best and most versatile agricultural land and in the response made by Southern Water, the Environment Agency and Natural England. The proposed modifications are set out as follows:

1.22 PM4 in the Schedule of Proposed Modifications ([SD14a](#)) - Development proposed in accordance with this policy should **not increase flood risk**, cause unacceptable harm to biodiversity and the water environment, to the character and landscape of the area or neighbouring uses, or create unacceptable noise/light and traffic generation. **Where appropriate, proposals should demonstrate they have considered and assessed any potential loss of the best and most versatile agricultural land.**

1.23 PM5 in the Schedule of Proposed Modifications ([SD14a](#)) – ii. Development which has an operational need for a countryside location, such as agriculture, horticulture, forestry, **essential infrastructure** or outdoor recreation; or

5. To ensure the policy promotes biodiversity should it align with the Local Nature Recovery Strategy?

WCC response:

- 1.24 It is important to read the plan as a whole. Criterion iii. of Policy NE5 specifically references retaining, enhancing and protecting biodiversity through Local Nature Recovery Areas and the Local Nature Recovery Network, which are part of the Local Nature Recovery Strategy. Any planning application that comes forward for development in the countryside would need to be assessed in conjunction with Policy NE5.