

## Winchester Local Plan EIP

### HBF Statements Matter 3

#### Matter: 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.

##### *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?

No comment

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

The HBF does not consider the plan period to be justified. The decision to start the plan period at 2020 has seemingly been made to include a period of higher delivery solely to reduce the number of homes it must deliver in future. This approach is not consistent with the approach to assessing housing needs which takes into account the fact that the standard method is forward looking assessment of housing need that takes into account past delivery. As set out in our representations, HBF consider such an approach to be inconsistent with the standard method. HBF also consider the plan period to be inconsistent with paragraph 22 of the NPPF which states that local plans should look ahead for at least a minimum of 15 years from the point of adoption. If the plan is found sound it would seem likely that the plan will be adopted before March 2026. As such the plan will be one year short of the requirement in paragraph 22 and should be extended to 2041.

##### *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?

NPPF24 states in paragraph 236 that a plan which has been adopted that meets less than 80% of local housing needs, as assessed using latest standard method, the planning authority will be expected to start work on a new plan in order

to address the shortfall in housing need. However, while this statement in national policy is welcomed HBF considers it to be essential that a commitment is included in the local plan that a new plan will start to be prepared immediately, in order to provide greater certainty that these actions will be undertaken. However, too often promises are made with regard to plan preparation only for councils to row back on these commitments with no consequences resulting from this decision.

HBF recognises that paragraph 78c of the NPPF24 will require the Council to include a 20% buffer in their 5-year housing land supply from July next year. However, given the scale of the housing delivery the Government considers is necessary in Winchester when compared to the requirement in this local plan, HBF do not consider this to be sufficient incentive for the Council to prepare a new local plan that will address this shortfall. As such HBF considers it essential that not only that a policy is included in the local plan committing the Council to the submission of a new local plan for examination within two years of the adoption of this plan but also that if this submission date is not achieved then the policies relating to housing supply in this plan will be considered out of date. This was considered to be an appropriate approach in the Bedford Local Plan 2030 and one that is considered essential with regard to this local plan given that the housing supply from the point of adoption will fall short of housing needs of over 7,000 homes.

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?

Yes.

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