
Winchester Local Plan

Local Plan Examination

Hearing Statement relating to: Matter 5 – Site
Allocation Methodology

On behalf of: Bloor Homes Limited

Matter 5: Site Allocation Methodology

NB1 All references to the NPPF in this Statement (unless explicitly noted) are to the December 2023 version of the Framework, as paragraph 234 of the latest, December 2024, version of the Framework sets out that: “For the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply (b) the plan has been submitted for examination under Regulation 22⁸⁴ on or before 12 March 2025”. However, it should be noted that as per paragraph 231 of the December 2024 version “The policies in this Framework are material considerations which should be taken into account in dealing with applications from the day of its publication. Plans may also need to be revised to reflect policy changes which this Framework has made”. As such, prior to and upon adoption of the Plan, the December 2024 version of the Framework will take effect.

Issue 1.1: Whether the site allocation methodology for proposed housing, mixed use and non-residential site allocations is justified, effective and consistent with national policy?

Methodology and Application:

Q.1. How have the proposed allocations been identified?

Q.2. Do they accord with the Plan’s spatial strategy as set out in strategic policies SP1, SP2, SP3 and H1, H2, H3 and E1-E3, in terms of the overall provision throughout the District?

- 5.1. Bloor Homes Limited (hereafter referred to as ‘Bloor’) confirm that the below statement is a response to Q.1 and Q.1 to avoid repetition. All comments made are expansions upon Bloor’s Manor Parks Regulation 19 (R.19) representations.
- 5.2. As set out in our Matter 4: Meeting Housing Need Hearing Statement, the draft Local Plan (submission document SD01) seeks to allocate only 2,875 dwellings of the 15,465 dwelling total District housing provision. The remainder of the requirement is to be provided from sites which have either completed (3,170 dwellings), have planning consents (6,870 dwellings), or have been carried forward (747 dwellings) or from windfall sites (1,895 dwellings). As such, circa 18% of the total housing requirement is being newly planned for within this draft Local Plan. Bloor does not consider that this minimal new contribution can allow the Plan to be considered to have been positively prepared.
- 5.3. Due to the above, Bloor is concerned that the planned housing provision, and therefore allocations, do not accord with the Plan’s spatial strategy. Our reasoning for these concerns is set out in full in our Matter 2: Spatial Strategy & Distribution of Development Policies Hearing Statement and reiterated below.
- 5.4. The draft Local Plan’s development strategy identifies three ‘spatial areas’ within Winchester District (Strategic Policy SP2). Strategic Policy SP2 sets out an indicative requirement of 5,640 dwellings in

Winchester Town (37.2%), 5,650 dwellings in South Hampshire Urban Areas (SHUAs) (37.3%) and 3,850 in the Market Towns and Rural Area (MTRAs) (25.5%).

- 5.5. Paragraph 9.6 of the draft Local Plan sets out that *“The Local Plan sets out a development strategy based on a sustainable settlement hierarchy (informed by the Settlement Hierarchy Review). Sites have been selected for allocation based on whether they would help deliver the Local Plan strategy, an assessment of their benefits and impacts (including Sustainability Appraisal and viability assessment) and whether they can provide the types of housing needed in various locations”*. Bloor raises no objection to a spatial strategy that delivers a balanced approach to housing that meets the needs of the Authority as a whole, however has concerns regarding the conflicts of Strategic Policy SP2 with the wider draft Local Plan objectives and policies and how the spatial strategy has been developed.
- 5.6. The draft Local Plan’s spatial strategy fails to prioritise Winchester Town as the most sustainable location for growth. The proposed distribution of development commits disproportionate growth to areas with limited active travel and public transport infrastructure. This will result in an over-reliance on private car use that will inevitably lead to increased congestion, emissions, and community severance, negatively impacting resident health and well-being. This approach contradicts the Plan’s own IIA criteria and conflicts with both current and emerging national planning policy, raising significant questions about the Local Plan’s soundness. This is explained below.
- 5.7. Paragraph 2.1 of the Development Strategy and Site Selection (July 2024) document (SD10b) states that the growth strategy for the District was informed by a ‘settlement hierarchy’ approach which ranked and classified settlements based on the availability and accessibility of a broad range of facilities and services, a settlement’s economic role and the environmental constraints to development. The spatial strategy resulted in the following spatial areas:
- Winchester Town Area (WTA);
 - South Hampshire Urban Areas (SHUA);
 - Market Towns and Rural Area (MTRA).
- 5.8. Paragraph 4.4 of the Transport Assessment (August 2024) recognises that *“there are disparities in transport provision across the district”* and this mirrors similar recognition set out in the ‘Transport Assessment Stage 1 Report’ (September 2020). In this respect, the evidence has been consistent over time.
- 5.9. Such differences are understood within paragraph 4.14 of the Transport Assessment (August 2024) (evidence base document ST15), which recognises that, within the South Hampshire Urban Areas, *“proximity to the strategic road network, combined with lower levels of amenities and employment opportunities with each urban area, encourages commuting trips to other towns being made by car,*

compounded by available public transport options being infrequent and limited in terms of accessible destinations and journey time”.

- 5.10. The transport baseline summary provided on numbered page 38 of the Transport Assessment report states *“most existing housing developments within the SHUAs provide footpaths which are attractive enough for most people to consider short trips by foot, however the distance to destination reduces the attractiveness of trips being made by this mode. Public transport options currently consist of limited and infrequent bus services between settlements...combined with lower levels of service for public transport and active travel modes means that the existing population is likely to have a relatively high dependency on private car travel...”*
- 5.11. The geography of part of the Market Towns and Rural Areas results in a broadly similar position as the SHUA and the transport baseline summary provided on numbered page 38 of the WCC R19 LP Transport Assessment report (2024) recognises that, *“based on the current situation, the relatively high distance from the settlements within this spatial area to the strategic road network may mean that increased development could result in higher congestion on the local road network as well as other transport related impacts such as vehicle collisions and reduced air quality”.*
- 5.12. Conversely, the transport baseline summary on numbered page 37 recognises that *“the Winchester Town Area has the highest levels of transport accessibility across the District, with services and supporting infrastructure for public transport, walking and cycling in the district.”* Furthermore, paragraph 4.61 recognises that *“Winchester Town Area is relatively small, compact and is visually attractive, meaning it is potentially conducive for most people choosing to walk for part, if not all of many regular journeys. In fact, most of the people who live and work in the city currently walk or cycle to work (60%).”*
- 5.13. The above statistic mirrors those presented by Bloor’s transport consultant in its Feasibility Report (Appendix 4 of our R.19 submission) which identified that the equivalent Winchester Town Area comprises of more than 40% of the available jobs in the District – 11 times greater than the next largest area of employment. This is four times the size of the next largest cluster of job opportunities.
- 5.14. In this sense, Winchester Town Area will always remain the largest attractor of commuting trips in the District and this is recognised within the WTA transport baseline summary provided on numbered page 37 of the Transport Assessment (August 2024) report, which states that *“travel demand in highway peaks is primarily caused by the significant in and out-commuting patterns to/from the centre of Winchester and reflects the City’s role as a regional employment centre”.* Consequently, delivering significant growth in other areas will be highly likely to result in the need to commute to the city over longer distance to access those opportunities.

- 5.15. However, on the Council's own evidence, such locations (i.e., smaller towns and villages) are poorly served by public transport and active travel connections, such that those longer distance journeys will inevitably need to be made by car – compounding existing congestion, delay, air quality and variance in public transport journey times within WTA.
- 5.16. This is in contrast to growth occurring within the WTA which would have access to more than 50% of the District's jobs [paragraph 4.56 of the Transport Assessment Report] within compact urban area which reduces travel distances, ensuring that over 60% of existing trips are already undertaken by non-car modes. In this way, there is a proven ability for trips to be undertaken without reliance on private car travel, in combination with an ingrained propensity for the existing population to actively travel by more sustainable modes. It is also true that such behaviour can more easily be influenced through vision-led strategies and travel planning interventions.
- 5.17. In addition to the above, the spatial strategy fails to demonstrate adequate integration with existing public transport networks and lacks a clear framework for aligning future development with public transport provision. Indeed, the proposed allocations outside of the WTA are on low frequency bus routes with significant journey times into the WTA, where over half of all journeys would relate to travel to access employment. This creates the conditions for car dominance that would result in more trips on the local and strategic road networks, compounding congestion and air quality issues.
- 5.18. Despite the fact that there is such explicit recognition that WTA is the most sustainable location for growth, throughout the various iterations of the evidence base, the draft Local Plan at Strategic Policy SP2, as above sets out an indicative requirement of 5,640 dwellings in Winchester Town (37.2%), 5,650 dwellings in South Hampshire Urban Areas (SHUAs) (37.3%) and 3,850 in the Market Towns and Rural Area (MTRAs) (25.5%).
- 5.19. The spatial strategy therefore proposes to deliver some 63.7% of growth outside of the Winchester Town Area and, therefore, as recognised in the Council's own evidence, in the less sustainable locations in the District. This is entirely misaligned with national policy and conflicts with the Plan policies and objectives. In addition to this significant flaw, of the 5,640 dwellings allocated to the Winchester Town Area, according to the Council only 1,660 dwellings are to be delivered from new allocations. Bloor disputes this provision and notes the carried forward Central Regeneration Area and Station Approach are counted as new allocations which is incorrect. As such, only 1,110 new dwellings are being planned for, of which 900 are from the Sir John Moore Barracks (SJMB) site which is currently in active MoD use. If the release of SJMB is delayed (which cannot be considered unlikely, given the Prime Minister's recent announcement to significantly increase defence spending), just 210 new dwellings would be provided in the Winchester Town Area. Bloor considers this to be wholly inappropriate and to be in direct contradiction to the government's requirement for Local Plans to be positively prepared.

- 5.20. The only reasonable conclusion to draw is that political motivation has had an unbalanced influence on the outcome of the Plan. This position has sought to detract from the consistent and explicit recognition of the significant locational advantages that exist in the Winchester Town Area, in contrast to physical and service barriers within the SHUA and MTRA.
- 5.21. The approach to the plan-making has not only distorted the strategy which now not only conflicts with the draft Local Plan's stated objectives and strategic policies but also with its emerging policies and with national policy. In its current state, the Local Plan is obviously unsound and further evidence and evaluation is required to underpin the current strategy – or to inform of a revised strategy.
- 5.22. Bloor stress the importance of the Council taking the tough choices now to ensure the right decisions are made to meet housing needs and assist in the national agenda of fixing the foundations of the housing system and crisis. Delaying these issues being addressed until the Local Plan review goes against their moral obligation set out by Deputy Prime Minister Secretary of State Angela Rayner and is simply “kicking the can” down the road. The consequence is significant as based on the Councils past precedent of Local Plan reviews, namely taking c. 12 years to review adopted LLP1, and government Devolution which will likely slow down this process further, even by the end of the current Parliament, Winchester will still likely not have an adopted Local Plan using the 2024/NPPF standard method. As such to press ahead with the draft Local Plan as drafted can only be seen as a political agenda from the Council in the aim of never having to deliver in line with the labour governments growth agenda. This is fundamentally wrong and cannot be deemed positive planning.

Q.3. How were the site boundaries, areas and dwelling/other capacities determined? Are the assumptions justified and based on robust evidence? In particular, are the indicative residential capacities, set out in the Plan's site allocations justified by the evidence and consistent with NPPF paragraphs 123 to 126?

- 5.23. No comment.

Q.4. How would the proposed allocations provide flexibility in the event that some sites do not come forward?

- 5.24. Bloor does not consider that the proposed allocations provide any flexibility in the event that some sites do not come forward as the Council has not allocated or reserved sites which provide a higher number of housing than its minimum housing need (13,565 standard methodology need plus 1,900 unmet need allowance) across the plan period.
- 5.25. As per our Matter 4: Meeting Housing Need Hearing Statement, we consider that flexibility is essential, due to fact that the draft Local Plan places heavy reliance on carried forward allocations which have not successfully been delivered under the adopted Local Plan (i.e., the Winchester Central Regeneration Area and the Station Approach Regeneration Area which are anticipated to provide 550 dwellings) and the

reliance on the Sir John Moore Barracks as the only new strategic allocation, which is currently an operational MoD site which was initially noted to be due for release in 2022 and is now scheduled for release in 2026. Furthermore, work undertaken by Savills Research demonstrating that approximately 25% of planning consents granted nationally over the past 10 years have not been implemented.

- 5.26. As such as a minimum, Bloor considers that a minimum 10% non-implementation contingency should be added to the Plan to allow for flexibility and reserve sites identified as mentioned in our Matter 3 Hearing Statement (in the event the Local Plan Review is delayed or annual delivery rates falter).

Q.5. *In addition, for each site allocation the Council should provide evidence to justify their delivery within the Plan period.*

- 5.27. **Yes.** Bloor considers that it is essential for the Council to provide evidence to justify the delivery of homes from each site allocated within the draft Local Plan. Due to the reasons set out in response to Q.4. this is considered to be of fundamental importance for historic sites carried forward from the adopted Local Plan which have not been delivered in the past, and Sir John Moore Barracks (SJMB) which is currently an operational MoD site for which the release date continually gets pushed back and the actual deliverable quantum is not yet known. Our concerns regarding the deliverable quantum of development on SJMB is evidenced by the fact the draft Local Plan policy W2 states the site will provide between 750 and 1,000 dwellings, yet it is confirmed to provide 900 dwellings towards the Winchester Town total provision. Bloor note if the delivery of SJMB falls to the minimum identified quantum (i.e., a reduction of 150 dwellings) the Council would not be able to meet its minimum housing requirement (including the committed unmet needs allowance).

Q.6. *The Council has set out tables relating to housing supply in each of the settlements within the spatial areas in the 'Development Allocations' section of the Plan. In relation to each spatial area, the Council should provide robust evidence to justify the number of dwellings anticipated to be delivered in the Plan period, including net completions, outstanding permissions, windfall allowance, and development equivalents, Neighbourhood Plan allocations, extant Plan existing commitments, and new site allocations.*

- 5.28. **Yes.** Bloor considers that this information should be provided.