

WINCHESTER LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor ID: ANON-AQTS-329Q-8

Representor: Bloor Homes Limited

Matter: 2

**Spatial strategy and distribution of
development Policies SP1, SP2, SP3,
H1, H2, H3, and E1 and E2**

Date: April 2025

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Examination of the Winchester District Local Plan 2020-2040 (the submitted Plan/the Plan)

Hearing Statement

Prepared by tor&co on behalf of Bloor Homes
04 April 2025

Introduction

- 1.1 This examination Hearing Statement has been prepared by tor&co on behalf of Bloor Homes (Representor ID: ANON-AQTS-329Q-8) in respect of **Matter 2 – Spatial Strategy and Distribution of Development** of the Winchester Local Plan examination in public.
- 1.2 The comments made within this Statement respond directly to the questions set out in the Planning Inspectors Stage 1 Matters, Issues and Questions (ID13), and are presented in the context of the ongoing promotion of Land at Mill Lane, Wickham (Draft Policy WK5 and SHLAA ref. WI02 and WI06).
- 1.3 This Statement should be read in conjunction with the Bloor Homes Regulation 19 representations and Stage 2 Hearing Statements.

Matter 2: Spatial strategy and distribution of development Policies SP1, SP2, SP3, H1, H2, H3, and E1 and E2

Issue: Whether the spatial strategy and distribution of development is positively prepared, justified, effective and consistent with national policy.

1. ***The Settlement Hierarchy Review (2024) scores settlements and groups them which provides the settlement hierarchy in the District. Is the methodology used robust and the outcomes accurate? Is the distribution of development between the tiers of settlements justified and how has it been established?***

No comment.

2. ***Is the spatial strategy and settlement hierarchy as set out in Strategic policy SP2 justified as an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence?***

No, the spatial strategy and settlement hierarchy set out in Strategic Policy SP2 are not justified as an appropriate strategy and will not be effective as it would not provide a strategy that provides sufficient housing to meet objectively assessed need and the identified unmet need of its neighbours.

Bloor Homes agrees with the principle of supporting the delivery of new housing and economic growth across the three identified spatial areas: Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Area. It is emphasised that all

three spatial areas are critical to delivering on the district's growth requirements. It therefore, welcomes the increased provision in the Market Towns and Rural Area.

Part i) specifies provision for 5,640 new homes in Winchester City, principally comprising existing allocations and commitments, with a disproportionate reliance on a select few large allocations and windfall sites. Only 1,110 homes are to be provided through new allocations, representing just 20% of the proposed spatial allocation for Winchester City. In the South Hampshire Urban Area, only 9% of homes are to be provided through new allocations and in the Market Towns and Rural Areas, 25% of new homes are to be provided through new allocations.

An over-reliance on sites already contained within the old, adopted plan does not represent an ambitious or positive approach in providing for current and future development needs. It also leads to the unjustified approach of seeking to manipulate delivery such that the trajectory can be balanced out (as set out in the Housing Topic Paper in relation to phasing). The reality is that these previously planned developments were needed and should have been completed years ago, but they are to be reallocated now due to the delays incurred. This approach is wholly inadequate in the face of the current unmet need pressure from the Partnership for South Hampshire (PfSH) area and the affordability challenge set out in the Strategic Housing Market Assessment (SHMA) (July 2024). Relying on existing allocations will not be sufficient and will further compound the district's affordability pressures. The Council should consider providing for additional development, beyond that set out in the emerging plan, during the plan period to meet the unmet needs of neighbouring authorities and any non-delivery on allocated sites.

NPPF paragraph 11 states that 'plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change' with paragraph 86 d) of the NPPF requiring planning policies to be "*flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances*". The NPPG is clear that the standard methodology set out within it provides a "minimum" figure of housing need (ID: 2a-002-20190220). It is a "starting point" (ID: 2a-010-20201216). This particularly applies in respect of the need to contribute to addressing the (growing) unmet need within the Partnership for South Hampshire area, as part of the Duty to Cooperate.

Consequently, to ensure that the plan is flexible and positively prepared to cover the whole of the plan period, the realistic need for homes above these targets should be acknowledged within the policy wording. The wording of i, ii and iii amended to read 'at least XX new homes'.

Winchester City Council should consider providing additional development, beyond that set out in the emerging plan, during the plan period to meet the unmet needs of neighbouring authorities and any non-delivery on allocated sites, thereby ensuring the plan is flexible.

Having established that there is a need to increase the current housing provision, there is a range of large and smaller sites in sustainable locations across the three spatial areas, with potential to provide additional housing, for example Land at Mill Lane, Wickham.

The key to a successful plan is to ensure that each area achieves a level of growth that enables their economies to grow and not stagnate, ensures that services and facilities can continue to be provided so that the sustainability credentials of both higher and lower tier settlements can be maintained and enhanced.

Given the chronic affordability challenge within the district, as set out in the SHMA (July 2024) relying on existing allocations will not be sufficient and will further compound the district's affordability pressures. This further emphasises the need for additional housing to be brought forward across the district.

Wickham is a larger settlement in the 2024 Settlement Hierarchy, with a reasonable level of services and facilities and is a sustainable settlement. There are sustainable options for growth at Wickham which would support and maintain existing services and facilities within the town. This has been recognised through the inclusion of Policy WK5, Mill Lane. This site should be expanded to include land to the north which is equally sustainable.

3. *Is the proposed distribution of housing and other development supported by the evidence in the SHELAA, settlement hierarchy, and IIA, and will it lead to an appropriate pattern of housing and economic growth?*

No, the proposed distribution of housing does not fully align with the evidence in the SHELAA, Settlement Hierarchy (August 2024), and the Integrated Impact Assessment (IIA) (July 2024).

The updated SHELAA report, 2023 (HA04) considers both the proposed allocation (WK5) and WI06 to be deliverable/developable. The majority of considerations have been assessed as Green with limited amber considerations. In light of this, it is unclear why a larger site has not been allocated on Mill Lane encompassing the Land at Junction of Mill Lane, Wickham (WI06). This forms part of the masterplan previously promoted and would increase the total number of units from 40 to approximately 100. This modest level of additional growth in this location would contribute towards supporting the sustainability of Wickham and with careful design would not unacceptably impact its heritage or rural character. It would also contribute to the significant level of unmet need within the Partnership for South Hampshire area and to the future requirement for additional housing provision under the revised standard method.

Settlement Hierarchy

The key to a successful plan is to ensure that each area of Winchester achieves a level of growth that enables their economies to grow and not stagnate, ensures that services and facilities can continue to be provided so that the sustainability credentials of both higher and lower tier settlements can be maintained and enhanced.

There is a chronic affordability challenge within the district, as set out in the SHMA (July 2024). Relying on existing allocations will not be sufficient and will further compound the district's affordability pressures. There is therefore a need for additional housing to be brought forward.

By way of example, Wickham is a sustainable settlement, with sustainable options for growth and is rated as a larger settlement in the 2024 Settlement Hierarchy, with a reasonable level of services and facilities. There are sustainable options for growth at Wickham which would support and maintain existing services and facilities within the town. This has been recognised through the addition of the draft allocation Policy WK5, Mill Lane and is supported by the evidence provided in the Site Selection Paper, Wickham (SD10j).

Integrated Impact Assessment (IIA) - July 2024

Evidence from the IIA demonstrates that Land at Mill Lane, Wickham (Policy WK5) (Site WI02) scores well in terms of sustainability criteria in respect of the majority of objectives. It is Bloors' view that biodiversity issues will not be significantly affected. Whilst the site will involve the development of greenfield land, only a relatively small area will be affected, which is in an otherwise sustainable location.

It should be noted that the site scores more favourably than a number of other proposed allocations e.g. Clayfield Park.

Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which bounds the Land at Mill Lane allocation performs similarly to the allocation, with the exception of the a 'minor negative uncertain' effect on landscape. Bloors are confident that the development of this site can be successfully integrated with the proposed allocation, with impacts on the wider landscape, including South Downs National Park, mitigated through careful design and landscaping.

It should be noted that this site also outperforms the Clayfield Park site (refer to Appendix F, Site Assessment Proformas, pages 148-150) in terms of sustainability within the Integrated Impact Assessment Report (refer to Appendix F, pages 1033-1035). WI06 is in single ownership and is more likely to be deliverable than the Clayfield Park site and can provide 40% affordable housing.

The expansion of the draft allocation at Land at Mill Lane, Wickham (Policy WK5) to incorporate WI06, would increase the total number of units to be delivered from 40 to around 100 and significantly elevate the number of affordable housing units from 16 to up to 40 on the site. This expansion would better reflect the sustainability evidence and settlement hierarchy, assist in addressing affordability pressures by significantly increasing affordable housing provision and ensure the plan is positively prepared and capable of meeting housing needs over the Plan period.

4. *Have settlement boundaries been defined in accordance with a clear and easily understood methodology that is consistently applied?*

No, Bloor Homes contend that the current approach to defining settlement boundaries lacks consistency and clarity.

The methodology used fails to adequately consider national policy priorities and expectations. Specifically, the NPPG emphasises the need for plan makers to be proactive in identifying as wide a range of sites as possible, as well as broad locations for development. Paragraph 20 of the NPPF requires plans to identify an appropriate and sustainable strategy for the pattern and scale of development. National policy further stipulates that new development should be distributed to minimise travel and encourage more sustainable modes of travel.

Wickham is classified as a larger settlement in the 2024 Settlement Hierarchy, with a reasonable level of services and facilities, making it a viable location for sustainable growth. However, Policy SP3, as currently drafted, fails to acknowledge or reflect the growth potential of Wickham or its relative position within the settlement hierarchy. Under the policy's restrictive framework, sustainable development opportunities adjacent to the settlement boundary of Wickham are afforded the same policy status

as sites adjacent to small rural villages. This does not represent a sound basis upon which to take forward the local plan, and constrains the flexibility and responsiveness of the new local plan.

Given Wickham's role within the settlement hierarchy and the pressing housing need, there is a clear case for an up-to-date and consistently applied review of the settlement boundary. The 2023 Strategic Housing and Economic Land Availability Assessment (SHELAA) identified six sites adjacent to Wickham's settlement boundary, with a combined estimated capacity of 957 dwellings. This highlights the necessity of a more consistent and forward-looking approach to settlement boundaries within Wickham and the district as a whole.

Policy WK5 should be expanded to include Land at the junction of Mill Lane, Wickham (WI06), increasing the total number of units on the site from 40 to around 100. The provision of additional housing at this location will ensure that the plan is positively prepared and remains effective over its period.

In conclusion, Bloor Homes consider that the current methodology is unclear, inconsistently applied, and does not adequately consider Wickham's role within the settlement hierarchy or the pressing need for housing.

5. *Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?*

No, the council has not fully considered all realistic options for the distribution of development within the District.

In particular, the wider site at Mill Lane Wickham (WI06) (IIA, Appendix F, pages 1033-1035), which forms part of the masterplan for Land at Mill Lane Wickham, has not been appropriately considered. Bloor Homes has confirmed that this site is available for development as outlined in our response to question 5 (Sustainability Appraisal) within our Matter 1 statement.

Land at Mill Lane, Wickham is conveniently located within a 15-minute walking distance of the market square which features essential amenities such as retail facilities, and there is a local primary school, a health centre, a community centre and playing fields. This accessibility aligns with and even exceeds the ambition for 20-minute neighbourhoods, under Strategic Policy T1. Additionally, the market square provides regular bus services to Winchester and Fareham, enhancing connectivity. It is a sustainable location for new homes that benefits from many locational advantages and should be expanded to incorporate Land at the junction of Mill Lane, Wickham (WI06), increasing the total number of units on the site from 40 to around 100. The provision of additional housing at this location will ensure that the plan is positively prepared and remains effective over its period. The number of homes to be provided within Market Towns and the Rural Area set out at criteria iii should therefore be increased to reflect the wider sustainable opportunity at Mill Lane.

This site represents a highly sustainable location for development and is more sustainable than several sites currently allocated within the emerging plan as evidenced in the IIA.

Therefore, we would urge a more robust consideration of additional development options in this location which would assist in address any shortfall in meeting both

current and future housing requirements, ensuring the plan remains positively prepared throughout its period.

6. *Would the Plan's spatial strategy strike the right balance between the need for development across brownfield and greenfield sites and any related impact on housing affordability?*

No, the Plan's spatial strategy fails to achieve an appropriate balance between brownfield and greenfield development, particularly in addressing the district's affordability challenges.

A number of the brownfield sites that have been allocated are to be brought forward from the current local plan. These include a number of major, complex projects that are located in Winchester city. It is intended that these sites are brought forward ahead of greenfield sites. However, a number of these sites have continually failed to come forward, have stalled or have gone backwards and hence there is a risk that the proposed spatial strategy will fail to deliver the housing required. There must therefore be a better balance between these sites and greenfield sites, which are more likely to come forward sooner to ensure that the plan is deliverable and therefore effective.

The Strategic Housing Market Assessment (SHMA) (July 2024) provides clear evidence of the chronic affordability challenge within the district. However, the current strategy, which relies heavily on previous allocations with only 25% new allocations, will not be sufficient and will further compound the district's affordability pressures. Additional housing must be brought forward.

Under Policy H6, brownfield sites are required to deliver only 30% affordable housing, compared to 40% on greenfield sites. This means that brownfield sites cannot contribute the same level of affordable housing, yet they remain a key focus of the spatial strategy.

Given the priority to deliver affordable housing, there is a disconnect between the reliance placed on brownfield sites, including those that have not delivered any housing to date, and greenfield sites that are more readily delivered and can provide higher levels of affordable housing. Consequently, the draft strategy needs to be altered so that there is a better balance between greenfield and brownfield.

Wickham is classified as a larger settlement in the 2024 Settlement Hierarchy, with a reasonable level of services and facilities. There are sustainable options for growth at Wickham which would support and maintain existing services and facilities within the town. This has been recognised through the addition of the draft allocation Policy WK5, Mill Lane.

To maximise its potential and better support housing affordability, Policy WK5 should be expanded to include Land at the junction of Mill Lane, Wickham (WI06). This would increase the total number of houses delivered on the site from 40 to around 100 and significantly elevate the number of affordable housing units from 16 to around 40 on the site.