

WINCHESTER LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor ID: ANON-AQTS-329Q-8

Representor: Bloor Homes Limited

Matter: 5

Site allocation methodology

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 5 – Site Allocation Methodology** 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 5: Site allocation methodology

Issue: 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

1. How have the proposed allocations been identified?

Supporting paragraph 11.2 of the draft Regulation 19 plan states “*in many cases, allocations in the existing development plan are being carried forward where they have not been substantially completed*”. In addition, “*the Council has undertaken a review of those allocations which do not yet have planning permission to consider if the allocation should be retained*”. The plan acknowledges that “*in some cases development has commenced and may be substantially underway*”; these allocations have still been carried forward.

Paragraph 5.1 of the Development Strategy and Site Selection report (SD10b) states “*consideration was given to those allocations in the adopted Local Plan which had not been completed to assess if there was still an intention to develop the sites and that they could be considered developable and be carried forward as allocations into the new Local Plan. These sites had already been found to be suitable and deliverable through the existing local plan process and the presumption was that they should be carried forward unless new issues had arisen that clearly demonstrated that they sites are not deliverable and the site should not be rolled forward into the new Plan*”. Little further information is provided to justify such sites being carried forward, even where it is clear that they should have been delivered some time ago.

For example, at paragraph 6.6 of SD10b, the table outlines very limited information in relation to allocated sites that are being carried forward.

This overreliance on long-standing allocations, particularly in Winchester City, is evident in the Winchester Housing Sources table (page 307 of the draft Plan). Of the 5,643 identified dwellings, only 20% are from new allocations.

An over-reliance on sites from the previously adopted plan is neither ambitious nor positively prepared. Many of these long-standing allocations should have been delivered much earlier but have been delayed for various reasons. Consequently, it is apparent that such sites have been included within the plan to accommodate previous housing requirements under the existing plan period, and not future need at this point in time. This approach is wholly inappropriate and inadequate given the significant unmet housing need within the Partnership for South Hampshire (PfSH) area and the district's affordability challenge. With respect to affordability, there is a chronic issue within the district, set out in the SHMA (July 2024). Simply relying on existing allocations will not provide a sufficient supply of new housing and will only serve to exacerbate affordability pressures across the district.

NPPF paragraph 11 states that *“plans should seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.”* This is especially relevant in fulfilling the PfSH strategy and as such, the plan should maximise opportunities to deliver housing throughout the district.

The current methodology for site allocations is wholly inadequate for the district's needs, due to the overreliance on existing allocations (and completions pre-dating the submission of the local plan). Instead, all deliverable sites in sustainable locations should be allocated in line with the settlement hierarchy, including in Wickham, which is classed as a larger rural settlement. Whilst Bloors support the use of the SHELAA to inform the site selection process, as set out in the SD10b, in respect of Wickham a narrow view has been taken to the identification of sites, with only those sites located adjacent to the settlement boundary considered. This has resulted in larger, sustainable sites such as the combination of WI02 and WI06, which adjoin each other, being overlooked, with no clear basis as to why both sites have not been allocated.

In respect of Wickham, the Wickham Site Selection Paper (SD10j) provide details of why and how sites within Wickham have been identified. It confirms that Wickham is a sustainable location for additional development. It identifies the 5 sites considered for allocation, and identifies the outcome of the Integrated Impact Assessment, SHELAA assessment and Landscape Sensitivity Assessment and Heritage and Archaeology, Transport and Flooding considerations. The Site Selection Paper clearly identifies within the conclusion the reasons for the identification of the two sites proposed to be allocated, which includes land under Bloor Home's control, WK5 (Land at Mill Lane, Wickham).

The Wickham Site Selection Paper notes that WK5 could “arguably be larger” but does not extend north of the existing site boundary due to the relative merits of alternatives and the higher landscape sensitivity. Nevertheless, it is Bloor's view that there is a clear opportunity to meet further housing needs by including **Land at the Junction of Mill Lane, Wickham (WI06)**. This modest expansion would still enable Wickham to maintain its identity and character, without having an adverse impact on its heritage or rural setting, as demonstrated in the Vision Statement submitted with Bloor's Regulation submission.

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?

Bloor Homes support the principle of delivering new housing across the three spatial areas, recognising that all three are essential to meeting the district's growth needs.

However, the proposed approach to allocations fails to sufficiently address both potential housing supply or housing need within these areas. As a result, the approach does not align with the overarching vision and objectives of the spatial strategy. The over-reliance on existing allocations and housing delivery before 2024 highlights the inadequacy of the current proposed allocations. This constrained approach to site allocations renders the draft plan inflexible, meaning it does not accord with Policy SP2 and H1 and is not positively prepared in accordance with the NPPF.

Additionally, the plan places excessive reliance on brownfield sites, which may not be deliverable as anticipated. This raises concerns that the plan will not be deliverable in its current form.

A clear and pressing need exists for additional allocations based on a significantly higher housing requirement than currently set out in the draft Local Plan. This is justified on the following grounds:

- The housing 'target' should be explicitly defined as a **minimum requirement**, as outlined in our Regulation 19 representations.
- The plan period should be **reset to look forwards, not back**, with both the housing requirement and supply calculated from this base date.
- An **uplift to the Standard Method Local Housing Need** is fully justified. The Housing Topic Paper fails to provide sufficient rationale for rejecting a further uplift.
- The current response to **unmet need** is wholly inadequate. Winchester can and should do more to meet NPPF paragraph 11b), the **Duty to Cooperate** (NPPF paragraphs 27 and 61) and section 33A of the Planning and Compulsory Purchase Act.

The current approach to site allocations does not provide a sound or robust basis for progressing the draft Regulation 19 plan. To meet the district's growth requirements, additional allocations must be made, or existing draft allocations expanded, without delay. One example is **Land at Mill Lane, Wickham (Policy WK5)**. Expanding this allocation to include **Land at the Junction of Mill Lane, Wickham (WI06)** would increase housing delivery on the site from 40 to approximately 100 homes, significantly boosting the number of affordable housing units to around 40 on site.

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?

Paragraph 123 of the NPPF 2023 requires planning policies and decisions to promote an effective use of land.

The 2023 Strategic Housing and Economic Land Availability Assessment (SHELAA) assumes a capacity of 47 dwellings at Land at the Junction of Mill Lane, Wickham (WI02). This site has been allocated within the draft Local Plan under Policy WK5 (Land at Mill Lane, Wickham) with an indicative capacity of 40 dwellings. However, as demonstrated in the submitted Vision Study accompanying our Regulation 19 representations, there is potential to provide additional housing beyond the indicative 40 dwellings at Policy WK5, ensuring a more efficient use of the site, subject to detailed design, in line with the NPPF.

While Bloor support the draft allocation at Mill Lane (Policy WK5), there is a clear opportunity to further meet housing needs by expanding the allocation to include Land at the Junction of Mill Lane and Blind Lane, Wickham (WI06). This site forms part of the masterplan previously promoted and could increase the total capacity to approximately 100 dwellings.

Paragraph 124a of the NPPF 2023 states that planning policies and decisions should encourage multiple benefits from both urban and rural land and taking opportunities to achieve net environmental gains, including enabling new habitat creation or improving public access to the countryside. Paragraph 124b requires planning policies and decisions to recognise that some undeveloped land can perform many functions, such as for wildlife, recreation.

As outlined in the submitted Vision Study, expanding draft allocation WK5 to include the wider site would facilitate the planting of native tree copses, creating new habitats and softening the urban form. The illustrative layout builds on the site's attractive landscape setting, orienting streets to frame key views while maintaining a strong connection to the surrounding countryside. Pedestrian routes would integrate with the existing network, enhancing access to village services to the south and countryside pathways to the north.

Paragraph 126 requires planning policies and decisions to reflect the changes in the demand for land and be informed by regular reviews of both the land allocated for development in plans and of land availability. Furthermore, where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in the plan it should deallocate that site.

In line with Paragraph 126, sites without a realistic prospect of delivery should be deallocated. As outlined within our Regulation 19 submission and Matter 4 statement, Bloor Homes has concerns regarding the lack of supporting evidence for the delivery timescales of various brownfield sites including the Central Winchester and Station Approach Regeneration Areas, which have historically failed to come forward and remain without planning permission.

Additionally, further concerns have been raised regarding the deliverability of other sites including CC1 Clayfield Park, BW3 Tollgate Sawmill and KN1 Ravenswood, which also do not have planning permission and which in two cases are occupied by existing users who would need to relocate.

Given the above, and in accordance with Paragraph 126, Bloor Homes recommend these sites should be deallocated. If these underperforming or undeliverable sites are removed from the plan, the Council should seek to allocate new sites or expand existing draft allocations, such as Land at Mill Lane, Wickham (Policy WK5), to ensure that the Local Plan remains robust, justified, and deliverable.

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

The draft policy wording for Policy H2 (Housing Phasing and Supply) states that “phasing will be applied to new greenfield housing sites allocated by this Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory”. Bloor Homes considers this approach to be overly restrictive and fails to apply a flexible methodology that would safeguard the district’s future housing provision against unforeseeable shortfalls or downturns in the market arising from ongoing economic issues.

While prioritising brownfield sites is consistent with the NPPF, it should be recognised that a number of Winchester City’s brownfield site allocations have not come forward, despite their allocation in successive local plans. For example, Policy W7 - Central Winchester Regeneration is an existing Local Plan allocation (WIN4) that has been carried forward. This site was also allocated prior to the current Local Plan as Policy W.2 – Broadway/Friarsgate (Silver Hill) within the 2006 Local Plan Review. It has still not been delivered. Similarly, Policy W8 – Station Approach Regeneration Area is also an existing Local Plan allocation (WIN7) that has been carried forward.

On the basis that the assumed housing supply represents the very minimum requirement within the district, given the over-reliance on existing allocations, the historical non-delivery of some brownfield sites, and the inclusion of past delivery, then there is considered to be no flexibility should any assumed sites not come forward. It is advisable to apply a non-implementation rate due to the complexities surrounding some sites, and the evidence on non-delivery. There is a clear case for allocating additional, particularly greenfield, sites in the most accessible and sustainable locations within the district.

One such opportunity is Land at Mill Lane, Wickham (Policy WK5). Expanding this allocation to include site WI06, which would increase the total number of units from 40 to around 100, would offer the flexibility to allow certainty of housing delivery.

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

Bloor Homes support the Council’s position that Land at Mill Lane, Wickham (Policy WK5) is deliverable, noting that survey work has already commenced in preparation for a planning application. Bloor Homes holds a longstanding option for the site, which is under single ownership, and is eager to progress with delivery at the earliest opportunity. Indeed, it would support removal of the delayed delivery dates set out in Policy H2, to enable the site to be delivered earlier in the plan period.

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.

The Council must provide clear and robust evidence to justify the anticipated housing supply within each spatial area, including a breakdown of net completions,

outstanding permissions, windfall allowances, development equivalents, Neighbourhood Plan allocations, extant commitments, and new site allocations.

Based on its reliance on brownfield sites, existing allocations and sites that have already been delivered under the existing plan period, combined with the requirement to accommodate the needs of the PfSH area, as well as the chronic affordability challenge within the district, then the assumed housing supply is considered insufficient, and over-optimistic.

Bloor Homes notes that a significant level of homes already completed are included in the housing supply figures for each spatial area. This includes completions which pre-date the submission of the plan, which should not be counted towards future supply. In Winchester, for example, the Plan includes 879 dwellings under “*Net completions in or adjoining settlements (2020-2023)*”. A similar pattern is seen in Wickham (page 454), where 118 dwellings have been included under past completions, and only 100 new homes have been allocated under Policies WK5 and WK6. As outlined in our response to Matter 3, regarding the plan period, it is not appropriate to include already completed dwellings prior to submission of the plan, given the need for the plan to look forwards for a minimum 15 year requirement, as required the NPPF.

Regarding Land at Mill Lane, Wickham (Policy WK5), Bloor Homes can confirm that the site is able to deliver a minimum of 40 units on-site as proposed in the draft allocation. However we would emphasise the potential to expand the allocation to include WI06, which would increase the total number of units from 40 to around 100.

This modest expansion would still enable Wickham to maintain its identity and character, without having an adverse impact on its heritage or rural setting. Additionally, this increase would contribute significantly to addressing the unmet housing needs within the Partnership for South Hampshire area and help meet the housing targets required under the standard method.