

WINCHESTER LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor ID: ANON-AQTS-329Q-8

Representor: Bloor Homes Limited

Matter: 8

**Development Allocations the Market
Towns and Rural Areas (MTRAs)**

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

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 8 – Development Allocations the Market Towns and Rural Areas (MTRAs) of the Winchester Local Plan examination in public.

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).

This Statement should be read in conjunction with the Bloor Homes Regulation 19 representations and Stage 2 Hearing Statements.

Matter 8: Development Allocations the Market Towns and Rural Areas (MTRAs)

Issue: Whether the proposed housing site allocations in MTRAs would be justified, effective and consistent with national policy?

Larger rural settlements

Colden Common

Policy CC1 Clayfield Park

1. Would the phasing of development until 2023 be justified by the evidence?

Clayfield Park is an existing local plan allocation that has yet to be delivered and is to be reallocated. It is noted that there is a recent consent (24/01557/FUL) for a single storey extension to an existing workshop on a small part of site (granted in August 2024), which is understood to be occupied by Clayfield Caravans. Given the recent planning consent, the nature of the existing use (storage of caravans) and the size of the site, it is questioned whether there is potential for a suitable alternative site for the existing business to relocate to, to allow for redevelopment of the site. This raises concerns about the site's deliverability for housing, certainly in the near to medium term.

In light of the above, other sites should be brought forward to ensure a steady supply of housing. For instance, Land at Mill Lane, Wickham (Policy WK5) is currently phased for the latter part of the Local Plan period, with permission for housing development restricted until 2030. This approach is unnecessarily 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.

- 2. *Given that this site is an existing allocation and has not delivered housing to date, what is the evidence that it will deliver from 2027/28 and within the Plan period?***

Based on our response to question 1 above, there is limited evidence to suggest that Clayfield Park will deliver housing from 2027/28 and within the Plan period. Furthermore, the Integrated Impact Assessment (published July 2024) identifies significant negative scores in relation to sustainable economic growth (IIA8), biodiversity and geodiversity (IIA9), natural resources (IIA12) and water resources (IIA13) with minor negative effects likely in relation to climate change mitigation (IIA1), transport and air quality (IIA2) and access to services, facilities and jobs (IIA7) (refer to Appendix F, Site Assessment Proformas, pages 148-150).

It is important to note that both the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02) and the Land at the junction of Mill Lane, Wickham (WI06) outperform the Clayfield Park site. Given this and concerns regarding deliverability, there is an opportunity for the development at Clayfield Park to be delivered on a larger site at Mill Lane, Wickham.

Wickham and Knowle

- 2. *What is the justification for a change to the settlement boundary and would it represent a consistent application of the settlement boundary methodology?***

The proposed adjustment to the settlement boundary is justified as it allows for modest, sustainable growth in Wickham, a Larger Rural Settlement with a reasonable level of services and facilities.

To ensure the Local Plan remains positively prepared and effective, the boundary should be further expanded to include WI06 (Land at the Junction of Mill Lane, Wickham). This would increase the number of homes delivered from 40 to approximately 100 in a sustainable location (as evidenced by the assessment in the IIA), thereby optimising the site's delivery of housing, in line with paragraph 60 of the NPPF.

While the proposed allocation boundary takes account of the existing field edge, it would be possible to establish a new, well-defined boundary to the site that clearly separates the enlarged allocation from the countryside beyond. The Vision Document submitted with the Regulation 19 representations demonstrates how the revised boundary would be sensitively integrated, reinforcing the settlement's identity while delivering much-needed housing in a sustainable location.

Policy WK1 Winchester Road housing and open space allocation

- 2. *Policy WK1vii requires sports pitches to be provided on land at Mill Lane. Given that this element of the development has not been delivered, what is the evidence to justify this requirement?***

Although the open space on land at Mill Lane has not yet been delivered, there is a clear commitment to its provision.

The latest information on Wickham Parish Council's website confirms that the delivery of this space is still planned, with ongoing discussions about the precise nature of the facilities to be provided. It is understood that there is funding available for said facilities, which will be provided as part of Bewley's planning consent in Wickham. This S106 payment may already have been made given the status of Bewley's site.

At their full council meeting on 30/01/2025, it was resolved to approve a recommendation to submit a business case to Winchester City Council, outlining the reasons against artificial pitches at Mill Lane. The final details of the sports provision are still under review.

3. *What is the evidence to justify provision of open space at Mill Lane?*

This provision is necessary to help meet part of the open space requirements for development and to improve the amount and distribution of available sports grounds.

Policy WK5 Mill Lane

1. *What is the evidence to justify this allocation which sits beyond the existing settlement boundary? Would it ensure that the rural setting of the settlement was preserved and the scenic beauty of the SDNP conserved?*

Wickham is classified as a larger settlement in the 2024 Settlement Hierarchy, with a reasonable level of services and facilities.

It is not uncommon for sites to be allocated beyond existing settlement boundaries. In Local Plan Part 2 (2017), similar allocations were made under Policy WK2 (Winchester Road Housing and Open Space Allocation) and Policy WK3 (The Glebe Housing and Open Space Allocation), both of which have since been successfully developed and integrated into Wickham.

While Policy WK5 is near the South Downs National Park, it sits outside the designated area. The site will be sensitively designed to minimise any potential impact, aligning with NPPF requirements for protecting designated landscapes.

Bloor Homes' masterplan (for the wider site) carefully considers the site's setting by incorporating:

- Retention of open land to the north, thus minimising impacts on the National Park.
- New copse and tree planting along the northern boundary, creating a landscape buffer to further strengthen the containment of the site, protecting the setting of the National Park.
- A well-integrated landscape design including:
 - The green trail to the east
 - Open countryside to the west
 - Retained trees and hedgerows which frame the proposals in an attractive landscape setting and
 - Street orientation to frame views to the landscape surrounding the site, ensuring the link to countryside beyond this edge of village is retained.

The allocation of Policy WK5 is justified based on Wickham's status as a larger settlement, the precedent for sustainable expansion, and the carefully planned measures to protect the rural character and scenic beauty of the SDNP.

- 2. *Would the policy be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals? In particular would policy WK5ii and WK5v together be effective in seeking direct, safe and lit active travel links to the surrounding area? Would they provide appropriate flexibility?***

No, the policy is not clearly written and unambiguous and changes need to be made so that it is evident how a decision maker should react to development proposals.

With regards to criteria WK5xii there is no identified concern around wastewater treatment/sewerage infrastructure set out in the Updated Infrastructure Delivery Plan, August 2024 in respect of this site; therefore, this should not be a reason not to bring the site forward earlier in the plan period. Furthermore, it is the responsibility of the statutory undertaker to service sites with planning consent.

With regards to the effectiveness of policy WK5ii and WK5v, we do not consider criterion WK5v is necessary given that criterion WK5ii seeks to ensure the site is well connected to the surrounding area by sustainable transport modes. Criteria v should be removed.

Criteria WK5ii provides appropriate flexibility.

- 3. *Would policy WK5ix provide adequate flexibility to accommodate the most suitable technical solution?***

No. As currently drafted, policy WK5ix does not provide adequate flexibility to accommodate the most technical solution.

Detailed modelling work will need to be undertaken in relation to surface water drainage to confirm the most appropriate strategy for dealing with surface water and therefore an element of flexibility is required within the policy to allow alternative strategies to be considered.

In respect of criteria ix, we consider the wording should be amended to include the following text:

“Unless modelling/ evidence demonstrates otherwise.”

- 4. *Would the requirements for offsite infrastructure be clear and unambiguous?***

The wording of criteria xiii is ambiguous. There is nothing in the supporting text to identify what supporting infrastructure is needed to make the development acceptable in planning terms. The policy needs to be amended accordingly to either remove this reference or to clearly identify what is required.

- 5. *Policy WK5i includes a phasing restriction. What is the robust evidence to justify this approach?***

Draft Policy WK5 currently states that *'The development is phased for the latter part of the Local Plan period and permission for housing development will not be granted before 2030'*.

Bloor Homes consider 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.

It is clear from Winchester City Council's trajectory as set out on page 218 and the text at paragraph 9.23 of the draft plan, that the general planned trend for housing provision in Winchester district is downward. In the face of the current stated level of unmet need in South Hampshire (including Havant and Portsmouth), and the increased housing requirements being introduced under the standard method, the phasing of this policy and indeed the other greenfield allocations in Winchester District into the second half of the plan period is unnecessary.

According to paragraph 82d of the National Planning Policy Framework (NPPF), *"planning policies should be flexible enough to accommodate needs not anticipated in the plan"*. This is considered particularly applicable to the growth requirements and potential of Wickham. Equally, NPPF paragraph 11 highlights that *'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.'* Accordingly, introduction of phasing will constrain housing delivery, and runs counter to the NPPF requirement for in-built flexibility within local plans. In being flexible and responsive to changing market circumstances, prioritising the development of previously developed land runs the risk of restricting the housing pipeline, further exacerbating the affordability housing challenge in the district.

In addition, the artificial restriction of the delivery of this site is contrary to paragraph 60 of the NPPF which seeks to significantly boost the supply of housing and requires that a sufficient amount and variety of land can come forward where it is needed.

Consequently, the policy wording should be revised to incorporate greater flexibility and to not exclude this (or other) site from coming forward earlier as the site can be delivered within the first five years of the plan period and there is no reason to prevent this. This would also support the sustainability of the settlement which would be frustrated if development is artificially held back.

Additionally, the council's reliance on the delivery of higher annual housing numbers during the earlier part of the plan period is based on the delivery of a large number of outstanding planning permissions and windfall developments, many of which will be on brownfield sites. There is evidence from the current local plan (e.g, Central Winchester Regeneration Area and Station Approach Regeneration Area) that brownfield sites do not deliver when expected.

6. Given site constraints, including traffic impacts, parking, public rights of way, proximity to the SDNP, what is the evidence that the site would be delivered in the Plan period? Given those constraints what is the viability evidence to justify its delivery?

Policy WK5 provides an opportunity to provide modest growth on the edge of a Larger Rural Settlement, helping to meet the housing and other needs of the settlement and contributing to its future sustainability.

The Vision Document submitted with the Regulation 19 response demonstrates that the site (including the draft allocation and WI06) is largely unconstrained, enabling a carefully considered design that enhances the rural character of this edge of Wickham.

Traffic impacts

A transport assessment will be undertaken as part of a planning application with mitigation provided for any identified issues. Given the small scale of the proposed development, the impacts would not be identified as severe. Notwithstanding this, the site enjoys a highly sustainable location being located in proximity (5-10 min walk, well below the 20 min neighbourhood concept) to a wide range of services including shops, doctor's surgery, the local primary school and community centre and is opposite the proposed recreation ground which Wickham Parish Council is bringing forward. All of these facilities are accessible on foot or by cycle. There are opportunities to connect into the wider pedestrian and cycle network and therefore huge opportunities to minimise car use.

Parking

Parking is not an issue as the site will provide adequate on-site provision to prevent overspill into surrounding areas. There is also potential to provide additional car parking for the adjacent doctor's surgery, for the benefit of the whole community, which is an opportunity that is unique to this site given its proximity to the doctor's surgery. The provision of such a benefit is subject to commercial considerations but such provision is more likely to be achievable if the scale of development is increased as Bloor suggest.

Public Rights of Way

There are no public rights of way on the site, removing constraints that could delay delivery.

Proximity to the South Downs National Park

While the site is near the South Downs National Park, it sits outside the designated area. The site will be sensitively designed to minimise any potential impact, aligning with NPPF requirements for protecting designated landscapes. Bloor Homes' masterplan for the wider site carefully considers the site's setting by incorporating:

- the retention of open land to the north, thus minimising impacts on the National Park
- new copse and tree planting along the northern boundary, creating a landscape buffer to further strengthen the containment of the site, protecting the setting of the National Park
- A well-integrated landscape design including:
 - The green trail to the east
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 - Retained trees and hedgerows which frame the proposals in an attractive landscape setting, and
 - Street orientation to frame views to the landscape surrounding the site, ensuring the link to countryside beyond this edge of village is retained.

Conclusion

The largely unconstrained nature of the site, its strong accessibility and careful masterplanning will ensure that Policy WK5 is both viable and deliverable within the plan period.

An increase in the size of the site allocation to encompass the land at the junction of Mill Lane, Wickham (WI06) would increase the total number of units from 40 to approximately 100. This modest level of additional growth in this location would still enable Wickham to retain its identity and 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 requirement for additional housing provision under the proposed amended standard method. It would also boost the supply of affordable housing. There is no reason to suppress the efficient use of land in this context and every opportunity should be taken to maximise the opportunity for growth in this logical location.