

WINCHESTER LOCAL PLAN EXAMINATION

Stage 2 Hearing Statement

Representor ID: ANON-AQTS-329Q-8

Representor: Bloor Homes Limited

Matter: 10

Homes for all (policies H5-H11)

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
14 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 10 – Homes for all (policies H5-H11)** 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 2 Matters, Issues and Questions (ED17), 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 1 Hearing Statements.

Matter 10: Homes for all (Policies H5-H11)

Issue: Would the housing policies H5-H11 be clear, justified and consistent with national policy and would they be effective?

Policy H5 Meeting housing needs

- 1. Would the size mix for market and affordable housing set out in policy H5 be justified by the evidence, particularly the Winchester Strategic Housing Market Assessment (HA01)? Would policy H5 provide appropriate flexibility to meet local evidenced needs? Should it provide further flexibility in relation to other matters such as site and local characteristics?***

Bloor Homes supports the principle of the provision of a range of housing types and tenures, and recognises the importance of meeting housing need in accordance with most recent evidence. However, we consider the size mix for market and affordable housing set out in policy H5 to be overly specific, and lacking flexibility. The mix of units to be provided on any site should be based on the latest SHMA and reflect local characteristics. Consideration should also be given to the implications of the criteria for the efficient use of land, their appropriateness for each site and the market for the homes to be provided.

Furthermore the requirement for schemes of 50 or more homes to include an element designed and marketed to meet the needs of older persons, or other local specialist needs, and affordable units must be applied flexibly and be based on a needs analysis supported by appropriate evidence. Consideration should also be given to the impact of this requirement on the viability of a scheme.

A range of housing types and tenures can be delivered as part of the Land at Mill Lane, Wickham site (Draft Policy WK5). However, there is the potential to expand the draft allocation to provide approximately 60 additional homes Land at junction of Mill and Blind Lane, Wickham (WI06), located north of the proposed allocation. This expansion would increase the range of housing types and tenures to be delivered on site, making most efficient use of land and increasing the affordable housing offer.

6. *What is the justification for the application of the optional requirements for M4(2) accessible and adaptable dwellings and M4(3)(2)(a) wheelchair user dwellings?*

Bloor Homes acknowledges the importance of ensuring that new homes are accessible and adaptable. However, the application of optional requirements for M4(2) accessible and adaptable dwellings and M4(3)(2)(a) wheelchair user dwellings must allow sufficient flexibility to factor in site circumstances for example topography etc. as this could affect levels, requiring retaining structures etc. As currently drafted it is insufficiently flexibly to reflect individual site circumstances. Furthermore, it is noted that the Focused SHMA Update (HA01) at paragraph 5.19 refers to the need for the application of the optional requirements to be subject to viability, as well as site suitability. This is not reflected in Policy H5.

In addition to the above, Bloor Homes has some concerns regarding the evidence on which this policy is based. The Wheelchair User Housing section of the Focused SHMA Update relies on dated England information that has been extrapolated to Winchester thus providing an 'estimate' of wheelchair user households rather than a number based on actual data. The update acknowledges that the estimated numbers do not indicate how many homes might be needed for this group as, for example, it does not take account of homes that are already suitable for wheelchair users.

Additionally, Bloor Homes' experience suggests that M4(3) properties have limited market demand among prospective buyers and are significantly more costly to construct.

Notwithstanding the above, should Building Regulations be updated to include M4(2) as standard, as has been suggested by the Government will happen, all Bloor Homes dwellings will be delivered in accordance with this.

7. *Would policy H5 be effective in enabling the Council to meet its statutory duty in relation to considering the needs of those wishing to build their own homes? Would those requirements be justified by robust evidence?*

As highlighted in our Regulation 18 and 19 representations, the proposed requirement for at least 6% self-build and custom build properties presents further technical challenges to an already complex planning system. Rather than supporting housing delivery, this requirement risks hindering the delivery of much needed homes and facilities.

The health and safety complications of delivering such properties should not be underestimated and there is limited evidence that self / custom build properties are working in practice. The reality is that the additional burden such properties place on developments is significant, in terms of management time, cost, and allocation of land with no guarantee of customer interest or uptake at the end of the process. Bloor do welcome the recognition within the policy that any plots that remain unsold after

12 months can be made available on the open market, or be built out or sold by the developer.

The self-build register alone is not a robust justification for the policy requirement, as it merely records expressions of interest with no criteria-based requirement. Paragraph: 011 Reference ID: 57-011-20210208 of the PPG expresses the need for the register to be “as necessary by additional data from secondary sources (as outlined in the [housing and economic development needs guidance](#)), to understand and consider future need for this type of housing in their area. Secondary sources can include data from building plot search websites, enquiries for building plots recorded by local estate agents and surveys of local residents. Demand assessment tools can also be utilised”. Whilst it is noted that the SHMA (HA02) does include secondary sources, it is noted that much of the information referenced is focussed on Winchester Town.

Policy H6 Affordable housing

6. *Would policy H6’s required tenure split for market led housing schemes be effective in meeting community requirements? Would further flexibility be required to ensure the breakdown relates to the most recent evidence of need?*

For market-led housing schemes, tenure targets are provided for affordable housing provision based on ‘low cost home ownership’ and ‘social rent or affordable rent’. To ensure that the right type of affordable homes is delivered in the right locations, such targets should be applied flexibly based on local need and site-specific circumstances at the time the site is brought forward. This will also ensure that the local plan is responsive to potential shifts or changes in local affordable housing need over the duration of the plan period, as referenced at paragraph 9.42 of the Plan. It is essential therefore that the evidence base underpinning Policy H6 is updated on a regular basis and that the policy recognises the potential for changing requirements.

Bloor Homes broadly supports the provision of a policy compliant level of affordable housing, reflecting the continued need for affordable homes in the district. At sites such as Land at Mill Lane, Wickham (Draft Policy WK5), Bloor Homes will aim to provide 40% affordable housing provision, equating to 16 units, thus making an important contribution to local need for affordable homes provided commercial considerations are balanced.

However, we consider that this draft allocation should be expanded to include approximately 60 additional units on Land at junction of Mill and Blind Lane, Wickham (WI06), located north of the proposed allocation, which has previously been promoted. This amendment would increase the total number of units to around 100, with up to 40 provided as affordable housing.