
Winchester Local Plan

Local Plan Examination

Hearings Statement relating to: Matter 10 – Homes for All

On behalf of: Bloor Homes Limited [R.19 reference - #ANON-AQTS-3BQA-Z]



Matter 10: Homes for All

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

Policy H5: Meeting Housing Needs

Q.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?*

- 10.1. Bloor Homes Limited (referred to hereafter as ‘Bloor’) confirms that all comments made are expansions upon Bloor’s Manor Parks Regulation 19 (R.19) representations.
- 10.2. Policy H5 sets out that development proposals will be supported where they provide housing of a type, size and tenure that contributes towards meeting housing needs and provides an acceptable level of amenity for its occupiers. Bloor supports the use of the SHMA as the starting point for determining dwelling size and tenure and the inclusion of the *text “unless evidence of local needs or the circumstance of the site justifies an amended approach”* as this will help ensure schemes which are needed by the local area are delivered.

Q.2. *Would policy H5 be effective in meeting demand for well-designed smaller homes?*

- 10.3. No comment.

Q.3. *Would policy H5 requirements for specialist homes be justified by the evidence? Would policy requirements provide appropriate flexibility?*

- 10.4. Policy H5 sets out that: *“Schemes of 50 dwellings or more should include an element designed and marketed to meet the needs of older persons, or other local specialist needs, and affordable units should*

be provided in the same proportion as the requirements for the site as a whole. The amount of specialist and supported housing should be in line with local needs, market intelligence and site viability”.

- 10.5. Bloor does not object to the requirement to deliver specialist housing, however emphasises the importance that there should be flexibility in this requirement subject to need and viability. Work undertaken by Tetlow King on behalf of Bloor demonstrates that there is a significant provision of suitable specialist housing schemes for older people within a 5km radius of the Manor Parks site and as such the immediate local population needs are considered to be met. Bloor considers that this market intelligence on local need should satisfy policy H5.

Q.4. What is the justification for the application of the nationally described space standard (NDSS)?

Q.5. What is the evidence that the Council has considered the impact of using the NDSS, in terms of Plan viability and any effects on the affordability of new homes?

Q.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?

Q.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?

- 10.6. Bloor does not have any comments on the above questions.

Policy H6: Affordable Housing

Q.1. Would policy H6 strike the right balance between the requirement for provision of affordable housing to help meet local needs and the delivery of the homes required within the Plan period, given other Plan policy requirements?

- 10.7. The draft Local Plan sets out that one of the aims of the Council Plan is to provide ‘Homes for All’. Paragraph 9.1 goes on to express the requirement of local plans to be based on evidence and that it is “**very important to deliver the right types and sizes of homes, including affordable homes, in locations that are sustainable**” [our emphasis added].

- 10.8. At Policy H6 (affordable housing), the draft Local Plan sets out that: “*in order to help meet affordable housing needs, all development which increases the supply of housing by 10 dwellings or more (or is on sites of over 0.5 hectares) will be expected to provide at least;*

- i. 40% of the gross number of dwellings as affordable housing;*

- ii. *On previously developed land, in recognition of the increased development costs including costs of land, the proportion of affordable housing will be no less than 30%.*

In the short term, where development is required to mitigate the impact of additional phosphates on the River Itchen SAC (see policy NE16), the proportion of affordable housing will be reduced to no less than

- i. *35% on greenfield sites;*
- ii. *25% on previously developed land”*

- 10.9. Bloor supports the provision of affordable housing to reflect evidenced local need within the Winchester Strategic Housing Market Assessment Update ('SHMA') (July 2024), however raises concern that the Local Plan as drafted would deliver insufficient affordable housing under the mechanisms of Policy H6.
- 10.10. The SHMA sets out a need to deliver 368 rented affordable homes per annum and 169 affordable home ownership dwellings per annum, a total of 537 new affordable dwellings per annum in the plan area in the 2023 to 2040 period. These numbers specifically relate to the number of new affordable dwellings required, as the existing supply of affordable dwellings from the likely number of homes that will become available from the existing social housing stock was already considered as part of the SHMA calculation. This requirement is significantly higher than the need for 343 new affordable dwellings per annum noted in the February 2020 SHMA.
- 10.11. Demand for these affordable homes is evidenced by the Hampshire Home Choice (HHC) Annual Report (2024)¹ which confirms, as of 1 April 2024, a total of 9,899 households were registered on HHC, of which 1,544 households were located in Winchester. Compared with the figure of 9,574 recorded on the 1 April 2023, there has been an overall increase of 325 (3%) households registered on HHC.
- 10.12. The Councils evidence base demonstrates that the draft Local Plan has a new affordable homes requirement of 10,158 dwellings ((343 x 3) 1,029 + (537 x 17) 9,129). As such affordable homes alone would make up over 65% of the total District housing provision across the Plan period. This provision is clearly not achievable via requirements set out in policy H6.
- 10.13. This problem is exacerbated by the supply of the draft Local Plan which is heavily reliant on existing commitments. Existing commitments account for approximately 70% of the overall provision, equivalent to all the delivery required in the first 12 years of the plan (8,833 homes based on the stepped standard method approach at Table H1 of draft Local Plan). To provide the required affordable housing for this period ((343 x 3) 1,029 + (537 x 9) 4,833 = 5,862) the existing sites would need to be delivering an average of

¹ <https://www.hampshirehomechoice.org.uk/Data/Pub/PublicWebsite/ImageLibrary/Hampshire%20Home%20Choice%20Annual%20Report%202024.pdf>

66% affordable housing. Bloor is aware that this is not the case, as affordable dwellings delivery over the last three Annual Monitoring Report Periods has averaged 40%.

- 10.14. The Council's viability evidence indicates that it would be unrealistic to expect developers to provide in excess of 40% affordable housing alongside cumulative costs of all other development and mitigation/infrastructure, and as such the only method to secure a quantum close the required 537 affordable dwellings per year is to deliver a higher quantum of market housing. Bloor notes that if the 2024/NPPF standard method requirement of 1,157 dwellings per annum or 23,140 dwellings across the current plan period, using a blanket 40% affordable housing provision (which is acknowledged to be best case), 9,256 new affordable homes would be provided, a shortfall against the 10,158 affordable housing need of 906 dwellings compared to the significant shortfall that will occur with the level of growth planned for as drafted. This is considered to demonstrate the importance of Winchester planning positively for growth and not treating this draft Local Plan as a stop gap.
- 10.15. As set out in our Matter 4: Meeting Housing Need Hearing Statement, the best way to ensure affordable housing delivery is to allocate large development sites, as acknowledged by the Council at paragraph 9.40 of the draft Local Plan and as evidenced by the most recent AMRs. For example in the period of 2022-2023 of the 383 net new affordable homes completed, 272 (or 71%) were delivered on major sites (46 dwellings at Berewood; 40 dwellings at Barton Farm; and 186 dwellings at North Whiteley) and in the period of 2023-2024 of the 331 net new affordable homes completed, 187 (or 57%) were delivered on major sites (28 dwellings at Berewood; 53 dwellings at Barton Farm; and 106 dwellings at North Whiteley).
- 10.16. Bloor therefore considers that in order for policy H6 to be effective in meeting the affordable housing needs of Winchester, the draft Local Plan must plan for a higher level of growth and seek to allocate a series of new strategic sites, including Manor Parks which will deliver a policy compliant mix.

Q.2. *Given the lower affordable housing requirements in relation to previously developed land and the requirements of policy H2, which prioritises that land, what is the robust evidence to justify this approach?*

Q.3. *What is the robust evidence to justify policy H6's affordable housing requirements?*

Q.4. *Would the Plan's approach to first homes/low costs homes be justified by robust evidence? Would it accord with national policy?*

Q.5. *Would policy H6's requirements accord with NPPF paragraph 66? Would it provide clarity as to what types of development would trigger the policy?*

Q.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?

Q.7. Would the policy's approach to the cost uncertainty of nitrate and phosphate mitigation as set out in policy H6 and paragraph 9.49 be justified and effective? Would the policy wording in this regard be clear and unambiguous, in particular reference to '...costs reducing significantly...'?

10.17. Bloor does not have any comments on the above questions.

Policy H7: Affordable Housing Exception Sites to Meet Local Needs

Q.1. Would policy H7i in requiring '...proposals to meet an identified local housing need ... within the settlement to which that need relates...' provide adequate flexibility to meet local affordable housing needs?

Q.2. Would the favourable support for proposals that are community driven or have gained the support of the community be appropriate and effective in meeting policy aims?

10.18. Bloor does not have any comments on the above questions.

Policy H8: Small Dwellings in the Countryside

Q.1. What is the robust evidence to justify the definition of smaller dwellings in the countryside and the 25% extension threshold?

Q.2. Would policy H8 be clear and unambiguous, so it is evident how a decision maker should react to development proposals?

10.19. Bloor does not have any comments on the above questions.

Policy H9: Purpose Built Student Accommodation

Q.1. Would policy H9 provide appropriate clarity to direct PBSA to acceptable locations? Would requirements in relation to cycle and car parking be clear and unambiguous? Would they accord with the Plan's transport policies, in particular T1 and T2?

Q.2. Would policy H9v strike the right balance between providing for PBSA and protecting the District's local distinctiveness and the delivery of planned growth within the Plan period?

10.20. Bloor does not have any comments on the above questions.

Policy H10: Houses in Multiple Occupation

Q.1. *What is the robust evidence to justify the requirements of policy H10i?*

Q.2. *Would policy H10 be clear and unambiguous, so it is evident how a decision maker should react to development proposals?*

Q.3. *Given the Plan's heritage policies would policy H10, appropriately address the historic environment?*

10.21. Bloor does not have any comments on the above questions.

Policy H11: Housing for Essential Rural Workers

Q.1. *Would the policy serve a clear purpose and would it be clear and unambiguous, so it is evident how a decision maker should react to development proposals? In particular would the requirements in relation to temporary agricultural dwellings and the requirement for '...a review of needs of the holding...' be clear and unambiguous?*

Q.2. *Given the Plan's heritage policies, would policy H11, in setting out requirements for the design of dwellings to reflect local distinctiveness appropriately address the historic environment?*

10.22. Bloor does not have any comments on the above questions.

Issue 1.2. Would the housing policies H4-H11 be clear, justified and consistent with national policy and would they be effective? Policy H4 Development within settlements

Policy H4: Development within Settlements

Q.1. *Given government policy to significantly boost the supply of housing, what is the robust evidence for the appropriateness of this policy which may work to restrict housing development in some types of settlements?*

Q.2. *Would policy H4 be clearly written, and unambiguous, so it is evident how a decision maker should react to development proposals?*

Q.3. *Would policy H4 provide appropriate flexibility to support sustainable development in settlements with defined settlement boundaries? Would it enhance or maintain the vitality of rural communities and promote small sites to meet identified need? Should the policy provide clear criteria for development that directly adjoins settlement boundaries?*

Q.4. Would policy H4 provide clear and appropriate criteria to support sustainable development within settlements with no defined settlement boundary? Would it be likely to enhance or maintain the vitality of rural communities and promote small sites to meet identified need?

10.23. Bloor does not have any comments on the above questions.