

# WINCHESTER LOCAL PLAN EXAMINATION

## Stage 2 Hearing Statement

Representor ID: ANON-AQTS-329Q-8

Representor: Bloor Homes Limited

Matter: 12

**High quality, well designed places  
and living well**

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 12 – High quality, well designed places and living well** 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 12: High quality, well designed places and living well**

***Issue: Would the Plan's approach to achieving high quality design in the Plan's three spatial areas and the individual policies be clear, justified, and consistent with national policy and would they be effective?***

#### **Strategic policy D4 Design principles for MTRAs**

- 1. Would strategic Policy D4, in setting out the design principles for the MTRAs have a clear purpose and avoid repetition of requirements of strategic policy D1 and the Plan's site allocations?***

As previously stated within our representations on the Regulation 19 Plan, there is some overlap between Strategic Policy D4 and Strategic Policy D1, with further requirements set out in individual site allocation policies. It is unclear why a separate policy for the Market Towns and Rural Villages is therefore needed and as such this policy is not justified nor required.

#### **Strategic policy D5 Masterplans**

- 1. Would strategic policy D5 be clear in its policy wording and supporting text as to what development would require a masterplan (para 5.70 states '...assessed on a site by site basis...', strategic policy D5 states at different parts '...on larger sites ... significant development on sites occupied by major landowners/users...') when they should be prepared, how they would be agreed by the local planning authority, and their status on that agreement? In this regard would the policy be clear and unambiguous so as to be effective?***

As previously stated within our representations on the Regulation 19 Plan, Policy D5 refers to the need for masterplans to be prepared on larger sites. However, the policy and supporting text is unclear on what comprises a larger site. This must be clarified. Accordingly, the policy as currently drafted is not justified or effective.

## **Policy D6 Brownfield development and making the best use of land**

- 1. This policy states that the local planning authority will prioritise development of previously developed land. How would this requirement be implemented and how would that requirement interact with strategic policy H2?***

Policy D6 prioritises the development of previously developed land (brownfield sites) which is compliant with the approach set out in the NPPF. However, it should be recognised that this policy raises challenges that must be considered in its implementation in relation to Strategic Policy H2, which focuses on housing supply and delivery.

Policy H2 holds back permissions for new greenfield site allocations until 2030 to prioritise previously developed land, achieve a more even housing trajectory and level of development over the Plan period. It is entirely unacceptable for the Council to withhold permissions for new greenfield allocations until 2030. Paragraph 60 of the NPPF explicitly states that land with permission should be developed without delay. The Council must ensure that developments capable of coming forward early in this plan period are supported, not obstructed.

As set out in our representations to the regulation 19 Plan, 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.

Bloor Homes consider it advisable to apply a non-implementation rate for brownfield sites due to their complexities and the evidence on non-delivery, or alternatively provide additional allocated sites, such as at Wickham, which can provide additional housing to that proposed, in order to ensure that housing targets are met in the event that there are problems with the delivery of brownfield sites.

The over reliance on brownfield sites, some of which have not been delivered, has the potential to affect the deliverability and therefore the effectiveness of the Local Plan.

## **Policy D7 Development standards**

- 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?***

Policy D7 as currently drafted requires that proposals comply with all national statutory standards related to environmental quality and that proposals are accompanied by a statement setting out how such requirements have been met in designing the proposal. As stated in our Regulation 19 representations, this requirement is unnecessary and does not serve a clear purpose, given that it

duplicates existing requirements. Furthermore, it does not identify which standards are to be considered. It is therefore unclear, inappropriate in planning terms and is not justified.