

WINCHESTER LOCAL PLAN EXAMINATION

Stage 2 Hearing Statement

Representor ID: ANON-AQTS-329Q-8

Representor: Bloor Homes Limited

Matter: 19

Monitoring

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 19 – Monitoring** 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 19: Monitoring

Issue: Whether the Plan would be able to be monitored effectively to ensure timely delivery of its proposals?

- 2. How would the implementation of the Plan be monitored? Would it be effective? How would the results of monitoring be acted upon?***
- 3. Overall does the Plan deal adequately with uncertainty?***

One of the most significant uncertainties within the Plan is housing delivery, particularly the delivery of brownfield sites.

Both the Central Winchester and Station Approach Regeneration Areas have historically not been delivered and do not have planning permission. Additional brownfield sites including CC1 Clayfield Park and BW3 Tollgate Sawmill also remain without planning permission and are occupied by existing users who would need to relocate. Compounding this issue is the artificial suppression of delivery arising from phasing restrictions on greenfield sites to 2030. There is no provision within the plan to deal with the level of uncertainty identified regarding the delivery of housing, given that the plan only seeks to provide for the baseline need generated by the Standard Method with no in-built flexibility to deal with non-delivery of sites. This could be addressed through the application of a non-implementation allowance and/or the allocation of additional sites.

In light of the above, it is imperative that adequate monitoring be undertaken to ensure any issues with delivery are identified quickly and then addressed.

Regarding the monitoring of policies H1, H2 and H3, the Plan states on page 523 of the Draft Plan that it will assess "the number of new homes granted permission and

whether the housing provision, distribution, and phasing targets set out in these policies are being achieved." While this is a step in the right direction, there is a notable lack of detail on the specific actions that will be taken if the targets are not met. The Plan should clearly outline the measures that will be implemented if housing delivery falls short of the expected levels, ensuring there is a responsive and adaptive approach to potential shortfalls.

The latest Annual Monitoring Report (AMR) (ED03a) references the Housing Delivery Test but fails to provide sufficient clarity on the actions Winchester would take if their delivery falls below the required threshold, as outlined in the National Planning Policy Guidance (NPPG). Depending on the level of delivery, these are:

- the authority should publish an action plan if housing delivery falls below 95%;
- a 20% buffer on the local planning authority's 5 year land supply if housing delivery falls below 85%; and
- application of the presumption in favour of sustainable development if housing delivery falls below 75%.

(Paragraph: 042 Reference ID: 68-042-20240205)

The AMR includes a section on previous overprovision. As discussed within our responses in Matter 4, overprovision is already reflected in the Standard Method calculation. The Standard Method accounts for past housing supply when determining future housing needs, as stated in paragraph 2a-005 of the NPPG.

Furthermore, whilst the housing land supply position presented in the AMR is 8.7 years for 2024-2029 and 9.3 years for 2025-2030 (based on the previous Standard Method) at a recent appeal decision, (APP/L1765/W/24/3350662, 31 March 2025), the council suggested that it could only demonstrate a 5.4 year supply of housing, based on the current Standard Method. The appellant considered the position to be 3.2 years of supply. The inspector stated they were *"not persuaded by the evidence of the Council as part of the appeal that it can demonstrate a 5 year supply of housing land with appropriate 5% buffer"*.

In conclusion, the Plan lacks the necessary clarity and detail on the actions to be taken if housing delivery targets are not achieved. Addressing these gaps is essential to ensure the Plan is robust and capable of responding effectively to potential challenges in housing delivery. In the absence of such detail, the Plan is not positively prepared or effective.