
Representations to Regulation 19 Consultation: Winchester City Council

Manor Parks: South Winchester Golf Club, Romsey
Road, Winchester

Prepared for: Bloor Homes Limited

Citizen Space Response ID: ANON-AQTS-3BQA-Z

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Executive Summary

Bloor Homes Limited ('Bloor') is promoting the land named 'Manor Parks' to Winchester City Council ('WCC') for a residential-led low carbon development of up to circa 1,100 dwellings. The site comprises approximately seventy hectares ('ha') of land currently occupied by the South Winchester Golf Course. Bloor acquired the freehold of the golf course in 2021.

Bloor is the UK's largest privately owned housebuilder delivering 4,252 homes in the financial year to July 2023 and more than 70% of our homes built on strategic land that Bloor own or control. This reflects Bloor's absolute commitment to the promotion of sites, dedicating and expending the necessary resources to achieve a successful outcome. Bloor plans to increase delivery to more than 4,500 homes based on a sustainable business model. Bloor is committed to the delivery of a high-quality development and is committed to reducing carbon emissions and waste in its business activities and has established new carbon and waste reduction and renewable energy targets.

Bloor considers Manor Parks to be an excellent opportunity to help contribute sustainably towards the acute housing need and Climate Emergency objectives of WCC and the wider region due to the reasons highlighted below:

- The site is adjacent to the existing settlement boundary of Winchester, a classified Tier 1 settlement under Policy SP2 and the most sustainable location in the district as also classified in the Settlement Hierarchy (2024).
- The site would deliver a balanced community of up to 1,100 homes providing homes for all alongside key social infrastructure such as a potential primary school, neighbourhood shop / multifunctional space to include healthcare, an LTA community tennis facility and a home-working hub to create a 20-minute neighbourhood.
- The site can deliver a significant positive contribution to the recognised and accepted acute local housing need without having an adverse impact on the historical or landscape setting of Winchester.
- The site is highly self-contained visually and is in a very sustainable location outside any Local Gap, with established employment, education and retail areas in Winchester all in close proximity providing a realistic opportunity for a significant number of residents to meet their day-to-day needs by active travel.
- The site could deliver a 10+% biodiversity net gain ('BNG') and the proposed development would retain around 50% of the site as green space including parks and habitat creation.
- The site could deliver low carbon buildings.
- **There are no technical showstoppers or constraints that would prevent this site coming forward for development.**

Given Bloor's proven track record of national and regional delivery as set out above, and that the site is in single ownership (which is often not the case on larger strategic sites), the site is available, suitable and deliverable as per the definition in the National Planning Policy Framework ('NPPF').

The standard methodology dictates a local housing need for WCC at 676 dwellings per annum which equates to **13,565 homes** over the proposed plan period 2020 to 2040 (as set out in Strategic Policy H1). WCC has included an 'unmet needs allowance' (for unmet need in neighbouring authorities) of **1,900 homes**, generating a total district housing requirement of **15,465 homes**. Table H2 of the Regulation 19 ('R19') Local Plan ('LP') sets out that just

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2,875 homes are being allocated within the Plan to meet this identified need. Much of the identified need is to be derived from outstanding planning permissions (6,780 homes), of completions since the start of the plan period (2020-2023) (3,170 homes) and windfall development (1,895 homes). Bloor fundamentally disagrees with this approach and considers that WCC should 'plan positively' for a higher level of the recognised future housing need instead of relying on historic consents and allocations, some of which were allocated in the existing adopted Local Plan and are yet to come forward. As below this should be achieved by amending the plan period and either (a) utilising the draft standard methodology or (b) planning in line with recent delivery rates.

Bloor further note that the WCC R18 LP included a buffer of 1,450 new homes on top of the standard method required, this buffer has now been removed from the R19 LP, this is inappropriate as the buffer would allow for market fluctuation, flexibility or non-delivery.

Bloor consider that the plan period should be amended from 2020 – 2040 to 2024 – 2041, as the plan should be forward looking and not reliant on historic delivery and should have a minimum 15 year outlook, taking into account any potential delays during EIP to subsequent adoption. This amended plan period, using the current standard method would have a housing need of 11,492, which alongside the unmet need allowance of 1,900, less the provision of 350 dwellings to the South Downs National Park would result in **a total district housing requirement of 13,042 dwellings**. When considering this against the identified housing provision (minus completions in years removed from the plan period) of **12,295 dwellings** as set out in Table H1, WCC would have a shortfall of **747 dwellings**.

Bloor make important reference to the emerging National Planning Policy Framework ('NPPF') consultation draft (hereby after the 'draft NPPF') and the revised stock base standard method calculation which generates a need of **20,333 homes** over the plan period, or **1,099 dwellings per annum**, approximately **7,000 homes** more than is currently being planned for, reinforcing the importance of planning positively and highlighting just how acute the affordability crisis is within Winchester and the wider District. While Bloor recognise the transitional arrangements set out within Annex 1, it is considered that WCCs attempt to rush their Local Plan through examination to avoid delivering the much-needed homes in an area with a growing affordability crisis is not in the spirit of the housing growth agenda being delivered by the new Government and is just "kicking the can" down the road for a few years when WCC say they will start an early Review of the Local Plan. Indeed they almost boast in the Foreword of the R19 LP stating that over 90% of the sites put forward by developers have not been taken forward by this Local Plan whilst at the same time inferring that the chronic lack of affordable housing delivery all lies at the fault of the developers. We evidence later that in this representation that this is simply not the case and that large strategic allocations have been the main source of a very limited supply of new affordable homes delivery. In a District with an affordability crisis, increasing house prices and a strong market it is not in the spirit of the NPPF to plan for the **Minimum**, unless exceptional circumstances, which WCC do not have, justify otherwise.

The importance of identifying and allocating more land for housing has been very clearly set out by Deputy Prime Minister ('DPM') Secretary of State ('SoS') Angela Ratner in her letter [New Homes Accelerator Programme to Unblock Thousands of New Homes](#) [dated 29th August 2024] which sets out *"It is because of this I know that, like every member of the Government, you will feel not just a professional responsibility **but a moral obligation to see more homes built**. To **take the tough choices** necessary to **fix the foundations of our housing system**. And we will only succeed in this **shared mission** if we work together – because **it falls to you and your authorities not***

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only to plan for the houses we need, but also to deliver the affordable and social housing that can provide working families with a route to a secure home” [our emphasis added]. Bloor therefore consider that the Local Plan has not been positively prepared in accordance with the existing NPPF, rather it has been developed in a protectionist manner.

If WCC chose to ignore the above tones of the government, which Bloor would fundamentally **object** to, it is considered that they should be planning in line with their more recent delivery rate to ensure it can be concluded that they are ‘planning positively’. Their current approach contradicts the vision of the government who in the draft NPPF consultation set out “*Given the chronic need for housing we see in all areas, we should celebrate strong delivery records without diluting future ambitions*”. In order to achieve positive planning, WCC should be planning for at least **996 homes per year**, in line with their average delivery from 2020 to 2023, or **18,685 dwellings** over the current plan period.

Furthermore, while Bloor is in support of WCC’s recognition of the importance of including an unmet need provision to assist their neighbours, the proposed 1,900 dwellings is considered to be insufficient in the picture of the **11,771 home** shortfall in the Partnership for South Hampshire area alone (Spatial Position Statement dated December 2023), which is also considered to be an under estimation of actual need. Bloor are aware from the Housing Topic Paper only Test Valley, East Hampshire, Eastleigh and Fareham are noted to be able to meet and potentially exceed their standard method-based housing need – with a total over provision of approximately **3,000 dwellings**. When including WCC’s over provision a shortfall of approximately **9,000 dwellings** remains. PfSH, in their Spatial Position Statement set out that the identified Board Locations of Growth will deliver this shortfall. Bloor do not consider this to be appropriate as it is not meeting the current need within the next cycle of Local Plans. It is therefore putting off taking the tough choices which DPM SoS Angela Rayner has told Councils they will need to take.

Explanation for the lack of adequate provision to PfSH is clear within the SoGC from Havant Borough Council which notes that there has been no engagement between the Regulation 18 and Regulation 19 stages from WCC. Bloor consider that this is unacceptable and raises issues regarding the legal compliance of Duty to Cooperate and soundness of the plan.

Resultant of the above, Bloor instructed Intelligent Land to calculate the estimated shortfall within PfSH if the draft NPPF is published as was consulted upon. This work, found at **Appendix 2**, indicates a total housing need of 94,931 dwellings between 2024 and 2036 and an identified supply of 59,916 dwellings for this same period (apportioned to PfSH). Therefore, a shortfall of 35,015 dwellings for the period of 2024 to 2036 would exist, with not a single member authority being noted to be in surplus and the New Forest (- 10,125 dwellings), Havant (- 6,699 dwellings) and Eastleigh (- 5,141 dwellings) having the greatest shortfalls. Bloor considers the above to be another fundamental reason why WCC is seeking to rush their Local Plan through Examination, as the draft NPPF seeks to strengthen obligations on cross boundary working. This matter was discussed at the Urgent Cabinet meeting in August 2024, where WCC’s legal advisor Andrew Fraser-Urquhart KC of Kings Chambers confirmed that currently the Duty to Cooperate is a legal requirement to provide a verifiable audit trail indicating an **attempt** to cooperate with neighbouring authorities (attempt to as opposed to succeed in), however it is changing to a requirement to **succeed** at under the draft NPPF.

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Bloor therefore considers that WCC should be taking a much greater proportion of the identified unmet need which has been demonstrated will grow exponentially in the coming months once the draft NPPF is published as per the strengthened Duty to Cooperate. PFSH themselves note in a document titled Spatial Position Statement [dated 6th December 2023] when considering all constraints within the area *“there is little unconstrained land remaining”* (paragraph 4.8). WCC has the ability to take a increased proportion of houses as WCC have a large quantum of unconstrained land which other areas of PFSH lack, as the R19 LP states that more than 90% of the sites promoted to the Local Plan are not required demonstrating a significant land surplus in the district (see paragraph 1.2 bullet point 4).

Strategic policies SP2 and H1 set out the housing provision and the spatial distribution strategy for the emerging R19 LP. This requires the delivery of 5,640 dwellings in Winchester Town, 5,650 dwellings in the South Hampshire Urban Areas and 3,850 dwellings in the Market Towns and Rural Area. Bloor consider that the spatial strategy insufficiently prioritises Winchester Town as the most sustainable location for growth. The proposed distribution of development commits disproportionate growth to areas with limited active travel and public transport infrastructure. This will result in an over-reliance on private car use that will inevitably lead to increased congestion, emissions, and community severance, negatively impacting resident health and well-being. This approach contradicts the Plan's own Integrated Impact Assessment ('IIA') criteria and conflicts with both current and emerging national planning policy, raising significant questions about the R19 LP's soundness. Furthermore, the spatial strategy fails to demonstrate adequate integration with existing public transport networks and lacks a clear framework for aligning future development with public transport provision.

Bloor consider that unless the spatial distribution strategy, strategic policies SP2 and H1, are reconsidered and ultimately allocate a greater proportion of new homes in Winchester Town, where facilities and jobs are located, the Local Plan cannot be deemed sound.

In addition to objections to the proposed quantum of housing and the spatial distribution highlighted above, Bloor raise concerns regarding policies and evidence base related to mitigating and adapting to climate change, biodiversity and the natural environment and sustainable transport and active travel.

Bloor recognise and support WCC's commitment to delivery of net zero. However, have significant concerns that the policies in their current form (particularly CN3) are unsound and could lead to a reduction in the delivery of much needed private and affordable dwellings. Bloor refer WCC to the national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal, and express that the R19 LP should adopt this approach. The evidence base and Local Plan as presented does not robustly ensure that development remains viable, and the impact on housing supply and affordability is considered in accordance with the NPPF as required by the written ministerial statement (WMS) published on the 13th of December 2023 and High Court judgement from the 2nd of July 2024 ([2024]EWHC 1693 Admin).

The WCC Local Plan Viability Study states on page 15, paragraph 3.31 that there are a range of sources as to costs and the assumption made is that it will fall in the range of an additional 5.0-5.8% on base build costs over the 2021 Building Regulations Part L update. Bloor considers this is an underestimate of the costs. As expressed by the HBF in their representation to WCC, “Ready for Zero” indicates that in order to deliver a similar standard to that being

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proposed by the Council would be around a 15% to 20% increase in per unit costs (c. £17,000 to £22,000 more per unit as per the HBF representation to WCC) compared to the 2021 Building Regulations Part L.

The R19 LP's evidence relies on a modelling approach fixed on a 'predict and provide' methodology to highway capacity modelling. This is outdated and inconsistent with the Authority's stated commitment to a 'vision-led' approach for future transport schemes. While the Authority suggests such modelling will be used to identify areas where adverse impacts arise and be used to inform non-car mitigation measures, this approach presents several flaws related to the neglect of beneficial impacts and missed strategic opportunities. The flawed and incomplete assessment process undermines the Plan's sustainability claims and casts doubt on its alignment with its own emerging policies and Plan objectives, but also of national policy and net-zero objectives. These issues go to the heart of soundness and significant further evidence is required – and potential refinement of the strategy – are needed to resolve the weakness.

While Bloor support the delivery of 10% BNG, as set out by the HBF in their representations to the WCC R19 LP, it is considered that the cost of meeting BNG has not be fully accounted for given that it appears to have been based on the 2019 Impact Assessment (IA). Costs have been based on 2017 data and the assessment fails to account of all considerations. This in combination with the issues raised regarding LETI standard viability, requires WCC to update their Viability Evidence base in order for the plan to be deemed sound.

Bloor also raise concerns with the evidence base relating to flood risk and drainage. Calibro have expressed that although the high level objectives of the Local Plan are reasonable and correlate with the existing and draft NPPF, the methodology applied by the Level 1 and 2 Strategic Flood Risk Assessment (SFRA) relating to the process for site selection is unclear and inconsistent across the relevant documents not replicated fully by the Development Strategy and Site Selection – Proposed Submission Plan document. Bloor consider that this could bring into question the soundness of the Local Plan.

Due to the reasons set out clearly within this representation, not limited to those summarised above, Bloor consider that without significant amends to plan for more housing in the correct locations and updates to the technical evidence base, such as Manor Parks, which could provide up to 1,100 homes, the R19 LP cannot be deemed sound and should not succeed through Examination in Public ('EIP').

Bloor express that if the Local Plan is successful at EIP and is subsequently adopted, as per KC advice, the Local Plan will be grossly out of step with the NPPF new standard method which is a key material consideration for planning application. The Local Plan will therefore be considered out of date from the day of adoption for decision making purposes. Bloor note that this places WCC in a position of risk in the context of speculative development.

1. Introduction

Purpose and Historic Promotion

- 1.1. This document provides representations on behalf of Bloor Homes Limited (hereby after 'Bloor') to Winchester City Council ('WCC') on the draft Local Plan in relation to the land named Manor Parks at South Winchester Golf Course ('the site'). This document should be read alongside the submitted forms on Citizen Space, which have been attributed the response ID ANON-AQTS-3BQA-Z. The Local Plan ('LP') is at Regulation 19 ('R19') (hereby after 'R19 LP') public consultation stage and is due for adoption in August 2025. This R19 LP provides a whole draft plan with strategic policies, the proposed settlement hierarchy, new development management policies and draft allocations for meeting the district's needs for housing, employment, retail, and other uses.
- 1.2. Bloor acquired the freehold of the golf course in 2021. Upon acquisition Bloor took on the commitment made by the previous owner, Crown Golf, that the golf course will remain operational until December 2025. The site although predominantly comprised of the golf course, however, also contains a small group of holiday chalets, and a building let to the PGA, which will not be subject to redevelopment and are excluded from the site red line plan.
- 1.3. To date, Bloor, and previously Crown Golf, have been promoting the site known as Manor Parks (South Winchester Golf Course), identifying this site as being strategically well-placed within the district for making a significant contribution towards housing needs as well as other key objectives in the R19 LP such as Carbon Neutrality and Homes for All. The site has been promoted through the various LP consultations and to the WCC 'Call for Sites Exercise' in April 2018 and to the SHELAA's in 2019, 2020, 2021 and 2023.
- 1.4. The site comprises 69.89 hectares ('ha') (172.7 acres) of land located at South Winchester Golf Course (constructed in the early 1990's), circa 1.6 kilometres south-west of Winchester city centre. The site is located adjacent (to the east) of Oliver's Battery, a post-war suburb of Winchester. Millers Lane forms the south-western boundary of the site, while the A3090 ('Romsey Road') forms the north-western boundary, which is one of the main thoroughfares into the centre of Winchester. The wider landscape to the north and west comprises agricultural land.
- 1.5. Much of the site is comprised of a golf course with semi-natural and amenity grassland and associated buildings, namely the modern club house. The site occupies an area of undulating land that incorporates a small valley running through its centre in a north-west to south-east direction. The two highest points of the site are at the western end of the A3090 and at the northern end of the Site adjacent to Oliver's Battery, both areas lying at approximately 117m Above Ordnance Datum (AOD). Visually, the site is well contained as a result of wider local topography and the valley described above. There is some additional enclosure through pockets of woodland within the site and mature planting on the northern and western boundaries.

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- 1.6. The site benefits from an established vehicular access via a standard form priority T-junction at the site's northern boundary onto the A3090-Romsey Road and is located some 1-kilometre west of the Pitt Roundabout, which connects with the M3 Motorway via Badger Farm Road.
- 1.7. The site has been attributed the SHELAA reference HUO1. Within the 2019, 2020 and 2021 SHELAA's the site had a noted area of 71.39 ha and an assessed capacity of 1,071 dwellings. This reduced to 68.9 ha and 1,034 dwellings in 2023 due to the submission of an updated red line plan to exclude the holiday chalets from the Site.
- 1.8. The site received identical suitability rankings in all four iterations of the SHELAA. Green rankings were provided for **all** environmental constraints and nearly all historical, policy and other constraints. Amber rankings were given to proximity of Listed Buildings, location within the countryside (under adopted LLP1 Policy MTRA4) and accessibility. It is worth noting that all major SHELAA sites received an amber or red ranking for location in the countryside.
- 1.9. The SHELAA concludes that the Site is deemed to be deliverable and developable within 10 to 15 years. Bloor supports the overall conclusions of the SHELAA and has indicated that amber rankings could be overcome through design work and mitigation, however, has disputed the fact that development could not commence in the next 1-10 years. Bloor considers that development could commence post-2026 when the deed of covenant to maintain the site as a golf course expires.
- 1.10. Savills on behalf of Bloor, submitted Regulation 18 Representations in December 2022 in relation to the Site. These representations included appendices on technical matters such as vision, the climate emergency and transport feasibility. All relevant submitted appendices have been updated for this submission and therefore they have not been re-provided.
- 1.11. An updated technical vision document for the site is provided in **Appendix 1** supporting this representation alongside. **Significantly, there are no technical considerations that would prohibit the site being delivered.** This representation provides an evidence-based overview of the potential for a strategic residential allocation at the land at Manor Parks, having regards to adopted and emerging national policy, the R19 LP strategy, The Integrated Impact Assessment ('IIA') and its supporting evidence base including housing need in both WCC, the Partnership for South Hampshire ('PfSH') and wider Hampshire area.
- 1.12. WCC adopted its Local Plan on 20 March 2013, and this sets out the long-term strategic plan for development within Winchester district, and includes the strategic vision, objectives and the key policies needed to achieve sustainable development in Winchester district to 2031. WCC committed to a new Local Plan at Cabinet on 18 July 2018, which is now due to be adopted in August 2024 (in accordance with the currently approved Local Development Scheme). The new Local Plan will set out policies and guidance for development of the Borough over the next 16 years to 2040, while this is in line with the minimum requirements set out in the National Planning Policy Framework ('NPPF') 2023, it is considered that WCC should extend the plan period to 2041 to allow for any potential delays during EIP and to subsequent

adoption. Furthermore, Bloor consider that the start of the plan period should be brought forward to 2020 to 2024 to ensure WCC do not rely on historic high rates of delivery.

- 1.13. Within this representation, we demonstrate that WCC should positively plan for housing growth with a provision in line with the draft NPPF standard method requirement of **20,333 dwellings**, approximately 7,000 dwellings additional homes than currently being planned for to ensure needs of the local population are met. WCC is able to meet this need, as their 2023 SHELAA identifies land with capacity to provide over 60,000 dwellings, less than 12% of potential land would be required. Furthermore, a larger contribution to unmet need should be provided to respond to the identified shortfall and limited number of authorities which can provide housing above their standard method.
- 1.14. Bloor Homes national and regional delivery of 4,252 homes in the financial year to July 2023, of which more than 70% were built on strategic land that Bloor own or control, with plans Bloor to increase this to over 4,500 based on their sustainable model, and their single ownership of the site (which is often not the case on larger strategic sites) demonstrates that the site is available, suitable and deliverable as per the definition in the NPPF and ensure contribution within the first 5 years of the plan post adoption. Bloor consider that the land at Manor Parks therefore provides a sound sustainable opportunity to contribute to the increased housing requirement in Winchester and should be allocated to help ensure the R19 LP can be deemed sound.
- 1.15. Bloor take this opportunity to clarify that as per the WCC evidence base, this representation refers to Winchester City as Winchester Town to ensure consistency in language.

Representations Structure

- 1.16. This representation document is structured as follows:
- **Section 2** provides the principal comments from Bloor on the draft Winchester Local Plan policies, except for those relating to quantum and distribution of housing which area covered in subsequent sections.
 - **Section 3** reviews the draft WCC Local Plan housing requirements and unmet need.
 - **Section 4** reviews both WCC evidence base and our technical evidence to demonstrate why a greater percentage of the total housing need should be located in and around Winchester Town.
 - **Section 5** sets out how the land at Manor Parks is the optimal site to meet any increased provision in and around Winchester Town through presentation of technical inputs regarding climate change, transport connectivity, ecology and socioeconomics.
 - **Section 6** draws out the key conclusions from these representations.

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Figure 1: Land at Manor Parks Red Line Site Plan



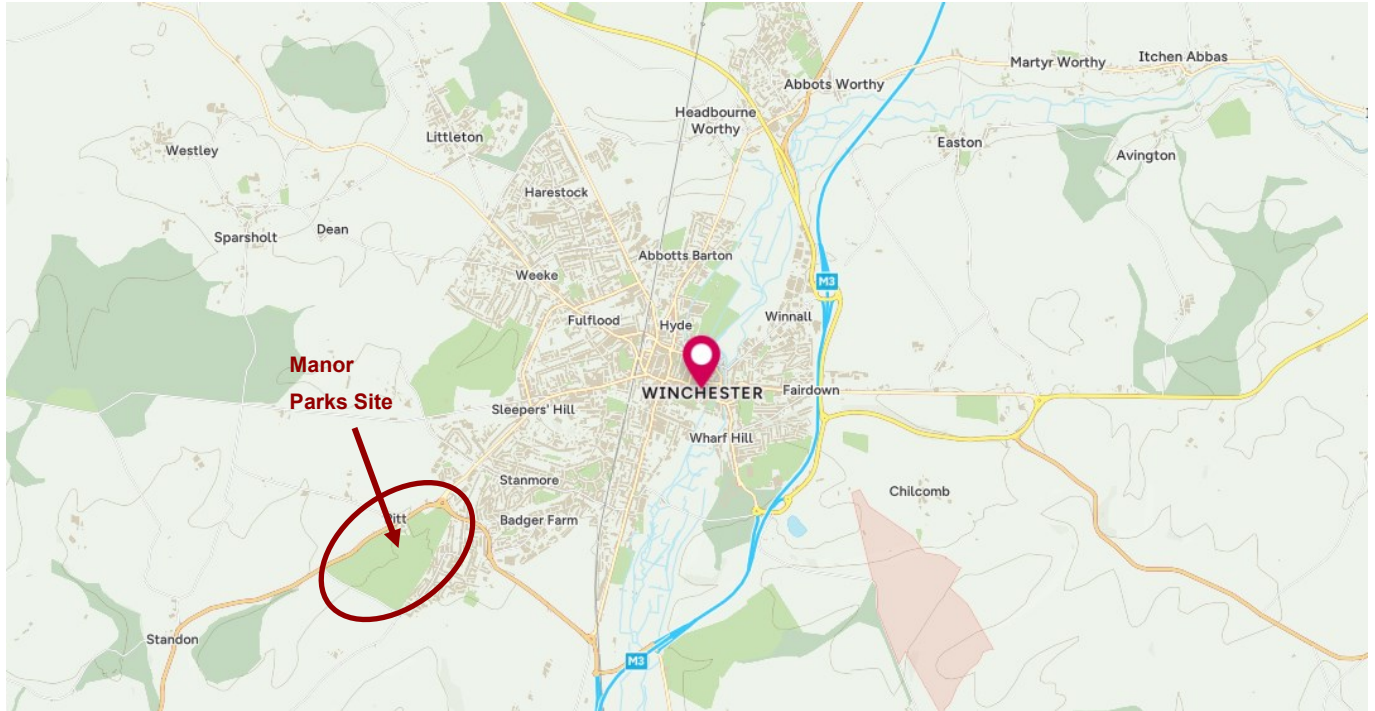
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Figure 2: Land at Manor Park Location Plan [Source: Explore OS Map]



2. Representations on the Draft Winchester Local Plan

Overall response to Winchester City Council Regulation 19 Local Plan

- 2.1. This section sets out Bloor's principal comments on the draft R19 LP. It is noted that detailed comments on the housing requirement and spatial distribution strategy are set out in subsequent sections.

Comments on Introduction

- 2.2. Overall, apart from the Plan Period Bloor welcomes WCC's approach to the Local Plan, in terms of recognising the key issues facing the district and its prioritisation of carbon neutrality and creating a greener district at the forefront of the Local Plan while still striving for delivery of affordable housing, as evidenced below in the extracted text from the draft Local Plan's foreword:

"The Local Plan sets out our vision and objectives for future development across the Winchester district outside the South Downs National Park – in Winchester itself, our market towns, villages and countryside ..." (paragraph 1.1).

"This Local Plan will run until 2040 and will represent a significant change from our previous plan. It has to address major new challenges:

- *The biggest challenge we face is climate change...This plan addresses this challenge head-on. To support our goal for the district to be carbon neutral by 2030, it sets amongst the highest standards possible for environmental design for homes and for commercial development – designed to cut carbon and cut bills...*
- *We also face a challenge of affordability. It's ever harder for all ages, and especially younger people, to find a suitable house they can afford.*
- *Finally, we face the challenge of protecting our natural environment..."* (paragraph 1.2).

- 2.3. Notwithstanding Bloor's support of the WCC's vision and objectives, a number of overarching objections are raised regarding whether the R19 LP as drafted is ambitious enough to meet these priorities and thus can be found sound. We discuss each of these concerns in detail within these representations.

- 2.4. The Local Development Scheme ('LDS') adopted August 2023, sets out that adoption of the Local Plan is expected to take place in Autumn 2025, once the Examination in Public ('EiP') has occurred. It is crucial that the current timetable is maintained, as such the plan would not comply with the requirement of paragraph 22 of the National Planning Policy Framework ('NPPF') which requires strategic policies to look ahead over a minimum 15-year period from adoption. It is considered that for best practice purposes that the plan period is extended to 2041 to allow for any potential delays minimising concerns regarding legal

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compliance and soundness. Bloor also consider that the start date of the Local Plan should be amended, this is discussed in **Section 3**.

- 2.5. It is noted in paragraphs 2.22 to 2.24 of the draft R19 LP that WCC *“has worked positively and collaboratively with neighbouring local planning authorities and other bodies to identify and seek to address any strategic, cross-boundary matters”*. Cross boundary working is noted to include collaboration with the Partnership for South Hampshire (‘PfSH’) on a range of strategic planning matters including how shortfalls of some members housing provision might be dealt with. Bloor question the accuracy of the statements made, on the basis of the following extract from the Statement of Common Ground with Havant Council *“Havant Borough Council notes that there has been no engagement between the Regulation 18 and Regulation 19 stages from Winchester City Council in order to address the matters raised in earlier representations or the letter of 5th March 2024. Havant Borough Council is mindful that the NPPF indicates that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for.”* [our emphasis added].
- 2.6. WCC draws reference to the Spatial Position Statement that PfSH has entered and the work streams currently underway. Bloor recognises and appreciates the work WCC has undertaken with PfSH, however consider that the R19 LP’s proposed provision (1,900 dwellings) to the identified 11,771 dwelling unmet need is grossly inadequate particularly when having regard to the exponential growth which will occur to this shortfall once the draft NPPF is published. **Appendix 2**, produced by Intelligent Land demonstrates that the identified shortfall will increase by 23,244 dwellings to 35,015 dwellings for the period of 2024 to 2036. Further information on the Duty to Co-operate is set out in **Section 3**.

Comments on Visions and Issues

- 2.7. As emphasised in paragraph 3.2 of the R19 LP, WCC recognises that since the adoption of the previous Local Plan (in 2011), there has been a range of new evidence produced and there are a number of new factors at play which influence the planning process, namely the fact that WCC declared a climate emergency in 2019 but also the economic change and uncertainty which has occurred following Brexit and the legacy of the COVID-19 pandemic.
- 2.8. Bloor supports the overall vision set out at page 21 of the R19 LP, and place emphasis on the importance of paragraph 2 in particular:
- “New development will address the needs of the area and enhance the sustainability of communities, natural environment and the economy and respond to the wider relationship with neighbouring areas. The climate and nature emergencies will lead to energy efficiency standards ensuring that residential development is built to net zero carbon. The concept of 20 minute neighbourhoods and active travel is ensuring that development is connected to public transport rights of way and cycleways”* [our emphasis added].
- 2.9. The objectives following the vision include (i) Tackling the climate and nature emergencies and creating a greener district, (ii) Living well, (iii) Homes for all, and (iv) Vibrant local economy. Bloor consider that

objectives (i), (ii) and (iv) are properly addressed within the vision, however greater emphasis to the importance of delivering new homes (including affordable homes) is required as opposed to simply referencing “*the needs of the area*”. Furthermore, while Bloor support the vision and objectives as set out in Strategic Policy SP1 (vision and objectives), it is not considered that the R19 LP as drafted will deliver these ambitions, meaning the Local Plan cannot be deemed sound. These objectives and concerns are considered in their respective sub-sections below.

- 2.10. Manor Parks can help to achieve WCC’s aspirations by delivering high-quality low carbon homes in a sustainable location that will meet a range of needs and aspirations including - a 20-minute neighbourhood; sustainable transport corridors and affordable housing (policy compliant provision). The scheme would also provide local services and connections including a significantly improved public transport service for the existing residents of Oliver’s Battery, which is currently poorly connected to the wider urban area.
- 2.11. The spatial strategy for the R19 LP is set out at Strategic Policy SP2, and whilst there is no objection to a spatial strategy that delivers a balanced approach to housing with a focus on Winchester that seeks to meet the needs of the Authority as a whole, Bloor raises several concerns regarding the proposed approach and subsequent distribution of allocations and therefore **object** to Strategic Policy SP2. We discuss these at **Section 4**.

Comments on Carbon Neutrality and Designing for Low Carbon Infrastructure

- 2.12. WCC sets out in the R19 LP that climate change is one of the greatest challenges which we face and sets out how WCC will deliver against the ambition to be a carbon neutral Council by 2024 and district by 2030 as per the adopted Carbon Neutrality Action Plan 2020-2030. Paragraph 4.1. states that mitigating and adapting to climate change and designing for low carbon infrastructure are vitally important and defining issues for WCC’s draft Local Plan. This sub-section considers policies CN1 to CN8.
- 2.13. Bloor is supportive of Strategic Policy CN1 Mitigating and Adapting to Climate Change which contains a well considered route to reducing emissions from homes and provides flexibility in approaches to design development and development scale at suitable criteria. For example, Adapting to Climate Change criteria ix. water use management and conservation and the concluding paragraph which refers to the requirement for an Energy and Carbon Statement, which is proportionate to the nature of application, to demonstrate how the design process has addressed the Policy CN1 requirements.
- 2.14. Bloor is in agreement with Policy CN2 Energy Hierarchy, that energy consumption and carbon emissions reduction should be approached in a staged manner, represented by an energy hierarchy. However, it is considered that the policy should include more detail on what interventions should be considered at each stage. As currently written, the policy does not provide sufficient detail to avoid confusion in interpretation. Bloor therefore **object** to Policy CN2 until energy hierarchy is adopted. Broadly speaking, this should be as follows:

Minimise energy demand by employing the 'fabric first approach'

- Orientation
- Façade glazing ratio
- Insulation
- Thermal bridging
- Air tightness

Maximise energy efficiency

- Lighting efficiency
- Ventilation efficiency
- Heating/cooling efficiency

Utilise renewable energy (onsite)

- Onsite renewables (e.g. PV, heat networks)
- Heat pumps for heating and hot water

Utilise renewable energy (offsite)

- Offsite renewables

2.15. The proposed energy hierarchy categories should be rephrased to reflect this approach.

2.16. Policy CN3 sets out Energy Efficiency Standards to Reduce Carbon Emissions. Policy CN3 requires all new residential development to comply with the following:

“All new residential development (excluding conversion and change of use) should not burn any fossil fuels on site for space heating, hot water or used for cooking. New residential development will need to be able to demonstrate net-zero operational carbon on site by ensuring:

- The predicted space heating demand of the homes based on predicted energy modelling, showing that the target of <15 kWh/M2/year is met.*
- The total kWh/yr of energy consumption of the building based on predicted energy modelling tools showing that the target of <35 kWh/ M2/year is met.*
- The total kWh/yr of energy consumption of the buildings on the site and the total kWh/yr of energy generation by renewables to show that the balance is met.*

iv. *Onsite renewables to provide 100% of the energy consumption that is required by residential buildings, for example through the installation of photovoltaic solar panels or other suitable forms of renewable energy generating schemes that are appropriate for the location or the setting”.*

2.17. Bloor recognise that Policy CN3 is clearly a very significant policy in terms of the Council’s ambition to deliver net zero development as well as the delivery of much needed new housing and non-domestic buildings in the district. Bloor supports the Council’s commitment to delivery of net zero housing. However, in its current form, we do have significant concerns that the Policy is unsound and could lead to a reduction in the delivery of much needed private and affordable dwellings. Bloor therefore **object** to Policy CN3 as drafted.

2.18. Policy CN3 is supported by evidence base documents which present the technical and financial information to justify the draft policy. Savills Earth, on behalf of Bloor have carefully reviewed draft Policy CN3 and its supporting evidence base document and have a number of concerns and suggestions which, if addressed, would result in a sound and effective net zero policy. There are set out below:

All new residential development (excluding conversion and change of use) should not burn any fossil fuels on site for space heating, hot water or used for cooking.

2.19. Bloor supports the transition away from fossil fuel use for space heating, hot water and cooking, and is committed to the use of electricity as the primary fuel source for new residential development, given the government’s intention to decarbonise the national electricity grid by 2030.

New residential development will need to be able to demonstrate net-zero operational carbon on site by ensuring:

i. *The predicted space heating demand of the homes based on predicted energy modelling, showing that the target of <15 kWh/M2/year is met.*

ii. *The total kWh/yr of energy consumption of the building based on predicted energy modelling tools showing that the target of <35 kWh/ M2/year is met.*

2.20. Whilst Bloor agree with the Council that there is a need to act to reduce carbon emissions they would disagree that this needs to be undertaken through the Local Plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the county, in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensure that improvements to building standards are actually deliverable from the point at which they are introduced.

Manor Parks Representations

Winchester Regulation 19 Local Plan Consultation

Citizen Space Response ID: ANON-AQTS-3BQA-Z



- 2.21. The Government states in the introduction of the 2023 FHS consultation that the 2025 Future Homes and Buildings Standards aim to build on the 2021 Part L uplift and set even more ambitious requirements for energy efficiency and heating for new homes and non-domestic buildings. These standards will be in line with meeting the 2050 net zero target and will mean no further work will be needed for new buildings to produce zero carbon emissions as the electricity grid decarbonises.
- 2.22. If WCC chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences and gives consideration as to how the requirements are consistent with the written ministerial statement (WMS) published on the 13th of December 2023. Before considering the content of the WMS itself it is important to note the High Court judgement from the 2nd of July 2024 ([2024]EWHC 1693 Admin). This judgement was on the challenge to the WMS made by Rights Community Action on three grounds, including that the WMS restricted exercise by local authorities of powers conferred on them.
- 2.23. The judgment made by Justice Lieven was that the claim failed on all three grounds.
- Ground 1: The Defendant failed to fulfil his duty under s.19(1) of the Environment Act 2021 to have due regard to the Environmental Principles Policy Statement (EPPS). The court held that although the Minister did not have express regard to the EPPS before promulgating the WMS, the subsequent consideration of the EPPS in February 2024 was sufficient. The assessment was carried out in substance, with rigour, and with an open mind, meeting the statutory requirements.
 - Ground 2: The WMS unlawfully purported to restrict the exercise by local authorities of their statutory powers, particularly under the Planning and Energy Act 2008 and the Planning and Compulsory Purchase Act 2004. The court found that the WMS did not unlawfully restrict local authorities' powers. The WMS was consistent with the purpose and effect of s.1 of the Planning and Energy Act 2008, which aims to prevent inconsistency of standards across different local authorities.
 - Ground 3: The WMS presented an unlawfully misleading picture of the legal powers of decision-makers, particularly Planning Inspectors. The court ruled that the WMS did not misstate the law or undermine the statutory powers of local authorities. The WMS's guidance on applying existing policies flexibly was within the legal framework.
- 2.24. In coming to these judgements Justice Lieven importantly notes the intention of the Government at the time with respect to section 1(1)c of the Planning and Energy Act 2008, which allowed Local Authorities to set standards above those in building regulations. Paragraph 65 states: *“With respect to the current section 1(1)(c) specifically, the Minister confirmed councils “can go further and faster than building regulations, but within the national framework”. The Minister also addressed the overall intention of clause 1(2) in the following terms: “The intention was for local authorities, in setting energy efficiency standards, to choose only those standards that have been set out or referred to in regulations made by the Secretary of State, or which are set out or endorsed in national policies or guidance issued by the Secretary of State. That*

approach was taken with a view to avoiding the fragmentation of building standards, which could lead to different standards applying in different areas of the country.”

- 2.25. The case involved consideration as to whether measures other than Target Emissions Rates used in the FHS should be used to measure energy efficiency and energy requirements. Mrs Justice Lieven concluded, in paragraph 70, that the measures for energy efficiency standards and energy requirements are those set out in the WMS and FHS i.e. Target Emission Rates (TER) and that it was not open to local authorities to choose measures other than this.
- 2.26. As set out within the HBF representation to the WCC R19 Local Plan, moving to the WMS itself, the housing minister notes that *“Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes”* and that local standards can *“add further costs to building new homes by adding complexity and undermining economies of scale”*. After noting these concerns, the 2023 WMS goes on to state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures:
- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the NPPF.
 - The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).
- 2.27. With regard to the first bullet point Bloor do not consider that WCC have properly and fully considered the implications of this policy on the deliverability and viability of new development. Firstly, the proposed standards are higher than the proposed FHS expected to be introduced in 2025 and seemingly will require higher levels of fabric efficiency. This will require new skills and materials that may not be readily available, and which could slow delivery in the short to medium term as these are developed. As such consideration will need to be given as to the delivery rates of development in the early years of the plan period with fewer homes potentially coming forward in this period as these much higher standards will take time to embed. Bloor and Savills Earth agree with these conclusions drawn by the HBF in their representation to WCC.
- 2.28. WCC must also ensure that the costs of its implementation are properly reflected in the viability evidence. The WCC Local Plan Viability Study states on page 15, paragraph 3.31 that there are a range of sources as to costs and the assumption made is that it will fall in the range of an additional 5.0-5.8% on base build costs over the 2021 Building Regulations Part L update. Bloor considers this is an underestimate of the costs. The Future Homes Hub has undertaken some work to support and inform the implementation of the FHS which is set out in “Ready for Zero”. This study tests a number of archetypes against a range of specifications from the current standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Council, however it must be noted that these are based on the use of SAP which the Council consider to underestimate the energy efficiency performance of new homes.

- 2.29. “Ready for Zero” indicates that in order to deliver a similar standard to that being proposed by the Council would be around a 15% to 20% increase in per unit costs (c. £17,000 to £22,000 more per unit as per the HBF representation to WCC) compared to the 2021 Building Regulations Part L. Whilst the specifications and assessment methodology may not be directly comparable to those being proposed by the Council it provides an indication as to the costs and that these are likely to be higher than those proposed in the viability assessment.
- 2.30. The second bullet point in the WMS quoted above requires any policy to be expressed as a percentage uplift to the Total Emissions Rates calculated using the specified version of the Standard Assessment Procedure (SAP). As such the Council’s policy, which requires development to achieve a specified level of space heating demand and energy use is inconsistent with national policy. The Council will need to amend its policy in line with this statement and ensure that it is consistent with SAP.
- 2.31. Bloor note that the Council state in paragraph 4.27 of the R19 LP that an accurate predictive energy modelling, such as Passivhaus Planning Package or CIBSE TM54, should be used in the energy assessment. If the policy is considered to be justified, then any statement / evidence required with regard to development achieving the standard set out in policy must also be based on SAP. The requirement of any other assessment package would be inconsistent with national policy.
- iii. *The total kWh/yr of energy consumption of the buildings on the site and the total kWh/yr of energy generation by renewables to show that the balance is met.*
 - iv. *Onsite renewables to provide 100% of the energy consumption that is required by residential buildings, for example through the installation of photovoltaic solar panels or other suitable forms of renewable energy generating schemes that are appropriate for the location or the setting.*
- 2.32. Bloor agrees with the drive to generate as much energy as possible on site to offset energy use. However, the current proposed policy ignores the fact that solar energy generation rarely matches energy demand at the time it is produced, therefore leading to excess energy generated that is not consumed on-site. For residential schemes this is especially apparent, where occupants are often out during the day (when energy is being generated but not consumed) and at home during the morning and evening (where it is being consumed but not generated). Solar energy production is at its highest during the middle of the day, in summer; whilst no energy is generated outside daylight hours and only small quantities are generated during winter. This is different to how most occupiers use energy, with more energy consumed during the cold months and often outside daylight hours to provide heating and lighting. This mismatch between consumption and generation leads to excess energy being generated during certain times of the year (summer) and more energy being consumed during other times of the year (winter). The proposed policy wording suggests that energy generation and consumption should be balanced over the course of a year for a net zero carbon development.
- 2.33. The excess energy produced by a renewable installation can either be exported back to the grid where it can be used by other consumers or curtailed. Curtailment effectively wastes the energy generated. The

extent to which excess power can be exported to the grid and used effectively is dependent on the available capacity in the local grid, which is determined and managed by the local distribution network operator.

- 2.34. Savills Earth confirm that if PV arrays are sized to generate as much power as is consumed onsite over the course of a year without sufficient grid export capacity, power generated on site will be wasted due to curtailment. This creates additional wastage due to the embodied carbon and resources used to produce superfluous PV panels.
- 2.35. In recent years, the UK national grid capacity has become more and more constrained due to increasing amounts of decentralised energy generation. Without significant grid reinforcement that is aligned with the delivery of housing and employment, additional power being exported to the grid has the potential to hinder further development in the area being able to export power.
- 2.36. Policy CN3, requiring the total annual consumption to be offset via generation from solar PV arrays has the potential to lead to oversized generation capacity that has an on-site utilisation rate of between 35-50%¹, meaning that over half of the energy generated by the panels is at risk of being lost if there is no export capacity. If buildings are of residential use, then the scheme is likely to have a more mismatched generation/consumption profile than, for instance, a commercial scheme. This would lead to an even lower utilisation, with between 25-30% of the energy generated being used on site. Bloor consider, that it is therefore paramount that the policy sets out a more flexible requirement for on-site generation that would allow developers to design arrays that maximise panel utilisation and on-site consumption, to avoid resource wastage and issues with the distribution network.
- 2.37. Savills Earth would encourage the Council to liaise with UK Power Networks and understand the existing state of the grid and how this policy could impact the future development in the area. The risk of saturating the power network is significant and there is a possibility it could hinder future development and delivery of the Plan.
- 2.38. Savills Earth consider that Policy CN3 should be revised as follows. Unless these adaptations are made, Bloor will continue to **object** to this policy.

Revised Policy CN3 - Energy Efficiency Standards to Reduce Carbon Emissions

All new residential development

*All new residential development (excluding conversion and change of use) should not burn any fossil fuels on site for space heating, hot water or used for cooking. New residential development ~~will need to be able to demonstrate~~ **should aim to deliver** net-zero operational carbon on site by ensuring:*

¹ The variability is determined by the consumption profile of the occupier.

- ~~i. The predicted space heating demand of the homes based on predicted energy modelling, showing that the target of <15 kWh/M2/year is met.~~
- ~~ii. The total kWh/yr of energy consumption of the building based on predicted energy modelling tools showing that the target of <35 kWh/ M2/year is met.~~
- iii. Compliance with the requirements of the 2025 Future Homes Standard, maximising opportunities to reduce energy demand, energy consumption and carbon emissions.
- ~~iv. The total kWh/yr of energy consumption of the buildings on the site and the total kWh/yr of energy generation by renewables to show that the balance is met.~~
- ~~v. Onsite renewables to provide 100% of the energy consumption that is required by residential buildings, for example through the installation of photovoltaic solar panels or other suitable forms of renewable energy generating schemes that are appropriate for the location or the setting.~~
- vi. Onsite renewables to ~~provide~~ **maximise onsite energy generation up to** 100% of the energy consumption that is required by residential buildings, for example through the installation of photovoltaic solar panels or other suitable forms of renewable energy generating schemes that are appropriate for the location or the setting, **subject to export capacity being available and design aspirations being met.**

Non-residential development

- v. Non-residential development should meet the 'BREEAM Excellent' standard or an agreed equivalent industry standard assessment process.

All new non-residential developments should maximize on-site renewable energy generation, **subject to export capacity being available and design aspirations being met.**

As a minimum, applicants will be expected to submit the following information as part of their planning application **detailing the type of renewable energy system proposed, the total installed capacity onsite (kWp) and estimated total generation (kWh/year), in addition to design details of the proposed renewable energy system and how it is integrated within the development.**

- ~~i. Total installed capacity on-site in (kWp) and total generation (kWh/year)~~
- ~~ii. The Photovoltaic area (M2)~~
- ~~iii. A roof plan marked-up with the Photovoltaic area.~~

- 2.39. WCC R19 LP Policy CN4 relates to Water Efficiency Standards in New Developments. The Policy sets out that *“Developments will be required to meet a high standards of water efficiency: i. Residential developments should be designed to achieve a maximum water capacity use of 100 litres/person/day from mains/private water supply in order to help manage the demand for water unless it can be demonstrated that this is not feasible”*. Bloor object to the proposed potable water consumption figure of 100 litres per person, per day quoted in Policy CN4. As expressed by the HBF in their representations the lower water standard of 100 l/p/d is not consistent with national policy which states that 110 l/p/d is sufficient in water stressed areas and therefore the policy cannot be deemed sound.
- 2.40. Policy CN4, criteria ii requires *“Any refurbishments and other non-domestic development would be required to meet BREEAM water efficiency credits”*. Savills Earth on behalf of Bloor, request that further details is provided on how many credits applicants are required to target to comply with the above policy.
- 2.41. Policy CN8 Embodied Carbon Assessment sets out that *“To contribute towards the City Council’s climate emergency and national climate targets as part of the design process, major residential and non-residential developments should calculate and supply information on the outcome of an embodied carbon assessment which follows the ‘RICS Whole Life Carbon Assessment for the Built Environment’ methodology or through a nationally recognised assessment. The outcome of the embodied carbon assessment should be included in the Energy and Carbon Statement that is a requirement of Policy CN1 and demonstrate what actions have been taken in the design process to ensure that as far as possible the proposal addresses embodied carbon”*.
- 2.42. The need to reduce embodied carbon where possible is supported by Bloor. However, the current policy wording is unclear as to which lifecycle stages should be included in the assessment. The ‘Carbon Neutrality and Embodied Carbon Topic Paper’ and ‘Embodied Carbon Policy Options’ documents included as part of the evidence base make reference to both upfront embodied carbon and lifecycle embodied carbon. As these two assessments measure carbon across different lifecycle stages, it is currently unclear what applicants are expected to assess. Confirmation is also required that detailed assessment of embodied carbon will not be possible for outline applications. Given the level of detail provided for an outline application, details of materials and construction methods are not defined, and as such, it is not reasonable to expect this policy to be met at the outline stage, although commitments should be sought from developers to adhere to the objectives, with further details to be confirmed during Reserved Matters Applications. Bloor consider that the policy should be re-worded as follows:

Revised Policy CN8 - Embodied Carbon Assessment

To contribute towards the City Council’s climate emergency and national climate targets as part of the design process, major residential and non-residential developments should calculate and supply information on the outcome of an embodied carbon assessment which follows the ‘RICS Whole Life Carbon Assessment for the Built Environment’ methodology or through a nationally recognised assessment, covering lifecycle stages A1-A5, B1-B5, C1-C4. The outcome of the embodied carbon assessment should be included in the Energy and Carbon Statement that is a requirement of Policy CN1 and demonstrate what

actions have been taken in the design process to ensure that as far as possible the proposal addresses embodied carbon. Outline applications are not expected to undertake assessment of embodied carbon emissions, although this can be provided during Reserved Matters Applications.

- 2.43. Overall, Bloor is in support of WCC's climate change objectives, however **object** to policies CN3 and CN8 which need to be amended to ensure they are consistent with Government guidance and are achievable. Bloor is committed to reducing carbon emissions and waste in its business activities and has established new carbon and waste reduction and renewable energy targets. It is important to reduce the impact Bloor's homes and developments have on the environment, create developments that are future proofed for a changing climate and deliver social value for customers and communities.

Comments on High-Quality, Well-Designed Places and Living Well

- 2.44. Bloor supports WCC's objectives set out at paragraphs 5.1 to 5.4 to plan for high-quality and well-designed places as a critical part of planning for climate change and WCC's journey to net zero and the health and wellbeing agendas.
- 2.45. Pages 66-68 of the R19 LP sets out how the 'High-Quality, Well-Designed Places and Living Well' objective will address the key issues of the Local Plan. This includes emphasis to the importance of the location of new development, and how this indirectly influences health and wellbeing and the delivery of concepts such as the 15-minute (criterion xxxi). Bloor support concept however note the remainder of the plan referenced the 20-minute city as opposed to the 15-minute city, requiring this section to be updated.
- 2.46. The R19 LP sets out that WCC will ensure that a site's development potential is maximised, and higher densities will be encouraged on sites which have good access to facilities, services and public transport whilst ensuring development responds positively to its setting (paragraph 5.73). Bloor is in support of the recognition of benefits which can occur from locating housing in the right place to ensure the most efficient use of land and local service provision by locating new housing where it will be in proximity to essential services, facilities and infrastructure, helping to achieve a sustainable pattern of development and carbon neutrality by 2030.
- 2.47. The R19 LP as such has been developed with a brownfield first approach (policy D6). Bloor supports and does not dispute the importance or principle of utilising brownfield sites. However, Bloor does raise concerns later within this representation regarding the fact that the WCC intends to restrict the release of new greenfield sites until 2030, under Strategic Policy H2 (housing phasing and supply), due to the finite source of brownfield land, the often-harder viability challenges resulting in reduced affordable housing provision and the strong message from Central Government to increase delivery. Some of these concerns were echoed by Councillors at both the Urgent Cabinet and Urgent Council meetings in August 2024.
- 2.48. In addition to the above, there has been a historic under-delivery of allocated brownfield sites, such as the Central Winchester Regeneration Area and Station Approach Regeneration Area which have a combined capacity of 550 dwellings. These have been carried forward from the previous Local Plan, and neither are

subject to a submitted planning application which indicates there is unlikely to be progress made towards their delivery at the early stage of the draft Local Plan period. Bloor therefore **object** to Policy D6 and Strategic Policy H2 on the grounds that they would restrict housing delivery, particularly affordable housing delivery (as Policy H6 requires a reduced provision on brownfield sites) in the height of the housing crisis. Issues of affordable housing delivery on brownfield sites is explored in greater detail at **Section 3**.

Comments on Sustainable Transport and Active Travel

- 2.49. WCC sets out that mitigating and adapting to climate change and reducing the carbon footprint of the district is an important part of the new Local Plan. To achieve this, it is recognised that *“there needs to be a step change away from continued reliance on private cars as a main travel solution and the use of sustainable and active means of travel must be prioritised and made more attractive options”* (paragraph 6.1). This is due to the fact that transport is one of the highest contributors towards the carbon footprint of the district and the private car is the least sustainable form of transport. As such, WCC recognises that it is essential for it to prioritise development towards sustainable modes of travel which includes safe and accessible means of transport with an overall low impact on the environment, which includes walking, cycling, ultra-low and zero carbon emission vehicles, car sharing and public transport (paragraph 6.2).
- 2.50. Bloor supports the location of development in the most sustainable locations with the greatest opportunities for active and low carbon travel and delivery of 20-minute neighbourhoods. Noting this, Bloor do not consider that the spatial strategy and subsequent allocations in the R19 LP as drafted meet this ambition, bringing question to the plan’s soundness. Comments regarding the spatial strategy are set out in **Section 4**. Manor Parks offers an optimal opportunity for WCC to deliver a site with these credentials as per the information provided at **Section 5** to ensure that the R19 LP can be deemed sound.
- 2.51. Calibro have advised Bloor, that the R19 LP’s evidence relies on a modelling approach fixed on a 'predict and provide' approach to highway capacity modelling. This is outdated and inconsistent with the Authority's stated commitment to a 'vision-led' approach for future transport schemes. While the Authority suggests such modelling will be used to identify areas where adverse impacts arise and be used to inform non-car mitigation measures, this approach presents several flaws:
- **Neglect of Beneficial Impacts:** The approach fails to account for the positive secondary effects of a 'vision-led' approach. For instance, improved public transport and active travel connections can encourage modal shift amongst existing communities located along the route, generating wider benefits and modal shift beyond the immediate development site. These compound effects, which are likely to vary significantly by location, are not considered. This omission undermines a comprehensive assessment of each site's contribution to Plan objectives, particularly regarding reducing the need to travel and minimising carbon emissions. It potentially leads to a flawed growth strategy and site selection process, jeopardising the Plan's soundness. See **Appendix 3** for further detail.
 - **Missed Strategic Opportunities:** The modelling approach overlooks the potential for individual sites to make greater contributions when strategically planned in conjunction with other developments (i.e.

the spatial strategy). For example, a coordinated 'vision-led' strategy for Manor Parks and Sir John Moore Barracks could facilitate integrated public transport solutions. This would not only strengthen connections to the town centre and railway station but also accelerate the delivery of the Winchester Movement Strategy, which aims to reduce the number of car trips travelling to the town centre. Failing to capitalise on such synergistic opportunities undermines the achievement of key Plan objectives and legal obligations to deliver net zero. See **Appendix 3** for further detail.

- 2.52. The flawed and incomplete assessment process undermines the Plan's sustainability claims and casts doubt on its alignment with its own emerging policies and Plan objectives, but also on national policy and net-zero objectives. These issues go to the heart of soundness and significant further evidence is required – and potential refinement of the strategy – are needed to resolve the weakness.
- 2.53. Notwithstanding, the above concerns regarding the transport evidence base, Bloor express that the highway modelling evidence identifies increased park & ride demand occurring in the southern part of Winchester Town which is of the same order of magnitude as anticipated in the northern part of the town. However, whilst the patronage changes in the northern part of the town will be accommodated (and indeed created) by a proposed new park & ride facility to be delivered as part of the Sir John Moore Barracks allocation, no new infrastructure has been identified to accommodate the change in demand in the southern part of the town.
- 2.54. This is inappropriate, as highway modelling evidence identifies increased park & ride demand occurring in the southern part of Winchester Town which is of the same order of magnitude as anticipated in the northern part of the town. Further justification for this need is set out in **Appendix 3**. Bloor propose that Manor Parks is the optimal location to facilitate this required park and ride as set out in **Section 5**.
- 2.55. Based on the above, Bloor do not consider that the WCC R19 LP strategic policies T1 Sustainable and Active Transport and Travel, SP2 Spatial Strategy and Development Principles and H1 Housing Provision can be deemed sound. Bloor therefore **object** to these policies. As above, further justification for Bloor's objection to SP2 and H1 is provided at **Section 4**.

Comments on Biodiversity and the Natural Environment

- 2.56. As part of the response to the climate emergency, WCC recognises that a high-quality natural environment is a key contributor to sustainable development and can support a wide range of biodiversity and contributes to human health and wellbeing (paragraph 7.1). At paragraph 7.7 the R19 LP notes that a key method of achieving this is to concentrate development in the most sustainable locations. As above, and in **Section 4**, Bloor do not consider that the R19 LP as drafted meets this objective of locating development in the most sustainable locations.
- 2.57. In line with the Environment Act 2021, the R19 LP will introduce a formal requirement for a minimum 10% measurable net gain in biodiversity as part of developments (paragraph 7.9). Furthermore, developments which maintain, protect, and enhance biodiversity and the landscape will be supported (paragraph 7.17).

Bloor supports the approach set out within this chapter of the R19 LP and notes that the proposed development at Manor Parks will retain up to 50% of green space on site and will provide a 10% net gain either on site or also via procurement of credits. Noting the above, Bloor consider that Policy NE5 Biodiversity is lengthy and repetitive with partial duplication of requirements already implied by the introductory text regarding the *Environment Act 2021* and obligations to secure 10% measurable net gains in biodiversity. It could therefore be set out more strategically and possibly combined with Policy NE1 to form a single succinct policy covering all natural environments and biodiversity.

- 2.58. Notwithstanding, Bloor's overall support to deliver 10% BNG, as set out by the HBF in their representations to the WCC R19 LP, it is considered that the cost of meeting BNG has not be fully accounted for given that it appears to have been based on the Governments 2019 BNG Final Impact Assessment (IA). The IA is an examination of the broad costs to the development industry based on a range of assumptions that will not necessarily reflect the type and location of development coming forward and the costs of delivering BNG. In addition, the cost of creating and maintaining one hectare of habitat on site is based on 2017 study by Natural Trust, RSPB, and the Wildlife Trust in relation to farms and not residential development. In particular the on site management costs may well be higher compared to the study and the Council will need to provide evidence to what these costs are rather than rely on those set out in the IA. Furthermore, the IA makes no consideration as to the potential reduction in the developable area in order to deliver at least 50% of net gains on site. This is the assumption made in the central estimate and which used in the Council's Viability Appraisal.
- 2.59. As expressed by the HBF in using the cost estimate in the IA the Council are underestimating the cost of offsite delivery to meet net gains. The IA applies a cost of £11,000 per offsite credit. This is much lower than current prices in the market which are in the region of: £30-50,000 per Grassland unit; £30-50,000 per Hedgerow unit; £30-50,000 per scrubland unit and; £30-50,000 per individual tree. These costs could also be higher still if there are insufficient credits locally. If credits are bought elsewhere then the spatial risk multiplier in the BNG Metric will increase the number of credits that are required. As such, Bloor, alongside the HBF consider that it is necessary for the council to update the inputs in the viability assessment to take account of the potentially higher costs relating to BNG.
- 2.60. Draft Strategic Policy NE1 relates to protecting and enhancing Biodiversity and the Natural Environment in the district. Bloor is generally supportive of this policy and its requirements, as indicated above, however consider that the policy does not clearly set out the hierarchy of protection and does not provide adequate advice for developments to follow the mitigation hierarchy. The Environmental Dimension Partnership Ltd (EDP), has advised Bloor that it is not necessarily feasible to protect and enhance all natural resources and there are now means available to compensate and ensure long-term gains are delivered, yet the wording of the policy is restrictive/contradictory.
- 2.61. Calibro, has advised Bloor regarding the flood risk and drainage evidence base and policies. Calibro have expressed that although the high level objectives of the Plan are reasonable and correlate with the existing and draft NPPF, the methodology applied by the Level 1 and 2 Strategic Flood Risk Assessment (SFRA) relating to the process for site selection is unclear and inconsistent across the relevant documents not

replicated fully by the Development Strategy and Site Selection – Proposed Submission Plan document. Bloor consider that this could bring into question the soundness of the Local Plan.

2.62. Calibro set out that the Level 1 SFRA had two parts. Part 1 (February 2024) applied to the wider Partnership for South Hampshire and identified the datasets required to apply the Sequential Test to the 10 participating LPAs, including WCC. The datasets were:

- River flooding such as flood zone mapping
- Surface water flooding such as the Risk of Flooding from Surface Water (RoFSW)
- Groundwater flooding such as the BGS susceptibility to groundwater flooding
- Sewer flooding
- Reservoir flooding
- Flooding from the sea

2.63. The Level 2 SFRA (July 2024) provides the evidence base to apply the Sequential Test in WCC specifically and provides analysis of preferred allocation sites. It uses available mapped flood risk data consistent with the Level 1 SFRA.

2.64. The Level 2 SFRA categorises the sites in four groups in accordance with the risk of flooding posed to them, as follows:

- Group 1: Sites in Flood Zone 1 with some dry access and low risk from other sources (surface water, groundwater, modelled flood extents, reservoir flooding, historical records).
- Group 2: Sites in Flood Zone 1 with limited dry access. Low risk from other sources (surface water, groundwater, modelled flood extents, reservoir flooding, historical records).
- Group 3: Sites in Flood Zone 1 with risk from other sources (surface water, groundwater, modelled flood extents, reservoir flooding, historical records).
- Group 4: Sites within Flood Zones 2 and 3.

2.65. The definition of the groups is unclear as there is no quantification of the terms ‘some’ or ‘limited’ dry access, neither ‘low’ risk. For example, some sites in Group 2 have mapped surface risk from ‘Very Low’ to ‘High’ based on the RoFSW mapping. This implies there is no specific definition of the term ‘low risk’, which makes the process difficult to replicate for unallocated or assessed sites.

2.66. The WCC Flood Risk Sequential Test and Exception Test Statement (‘the Statement’, July 2024), ‘Assessing Flood Risk’ section on page 12, notes the criteria used to assess the sites that had been included in the R18 LP, as follows:

- Proportion in Flood Zone 2 and 3a
- Proportion within Flood Zone 3b
- Hazard ratings on the site and access route during the modelled 1 in 100 year flood event, inclusive of climate change

- Recorded Flood Outlines
 - Number of internal and external property flooding records within 500m of the site
 - Number of historic flood incident records within 500m of the site
 - Susceptibility of the site and local to groundwater flooding based on BGS Susceptibility to Groundwater Flooding mapping and historic records
- 2.67. The criteria used in the Statement is therefore inconsistent with the methodology applied by the Level 1 and 2 SFRA, despite the 'Flood Zone Definition' section of the Statement (also on page 12) repeating the SFRA methodology. Crucially, the R18 assessment did not include analysis of surface water flood risk, which is inconsistent with the existing and draft NPPF which requires plans to take a *“risk-based approach to the location of development – taking into account all sources of flood risk..”*. In addition, paragraph 1.12 of the Statement explains that Flood Zone mapping *“provides more precise data compared to surface water flooding”*. This is often the case where detailed river modelling exists and it is generally acknowledged that the national surface water modelling is strategic scale. However, it is not always the case that flood zones are more accurately derived. For example, where the National Generalised Mapping or similar methodology has been used to derive flood zones. Nonetheless if WCC consider surface water flooding to be predicted by an inaccurate data source then it brings into question why it was a key dataset in the Level 2 SFRA.
- 2.68. It is noted that the site selection methodology used in the Development Strategy and Site Selection – Proposed Submission Plan (July 2024) document is also inconsistent with the SFRA and the Statement methodology. It applies just two criteria to the site appraisal – Flood Zones and Surface water flood risk areas. There is no definition or scale to quantify these areas/zones and therefore how the Integrated Impact Assessment categories are determined, e.g. Minor vs Significant. Furthermore, the use of surface water mapping to inform the site selection process is inconsistent with the R18 assessment.
- 2.69. Finally, Calibro were unable to find the full results of the site selections process and therefore the outcome of the Sequential Test, crucially whether some sites were not progressed on account of failing the Sequential Test. This lack of clarity, together with the inconsistent approach applied across the documents brings into question the soundness of the Local Plan.
- 2.70. Bloor raise a number of concerns with R19 LP Policy NE6 Flooding, Flood Risk and the Water Environment, as while the policy reflects the NPPF, it has very high-level wording that would be difficult to enforce. Paragraph 7.59 refers to the sequential approach but contains no reference to the SFRA or similar document to confirm the methodology to apply such sequential approach and therefore embed these methodologies in policy. Furthermore, policy NE6 would benefit from more specific standards for sustainable drainage, such as preference for infiltration where possible or clear betterment requirements for brownfield sites. For example, many Local Plans now contain standards that a 50% reduction in runoff from brownfield sites is a requirement.
- 2.71. Bloor is generally supportive of R19 LP Policy NE16 Nutrient Neutrality Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SAC) and Ramsar Sites of the Solent and the River Itchen, however note that the wording needs to be tightened with sufficient clarity currently presented

on the means available to deliver nutrient neutrality, as currently it leaves too much uncertainty about how to address nutrient neutrality as part of the planning process. There is much supporting information related to the availability of nutrient credits and the importance of strategic solutions, yet the policy is lacking in the ability of the Local Planning Authority (LPA) to assist with the solutions.

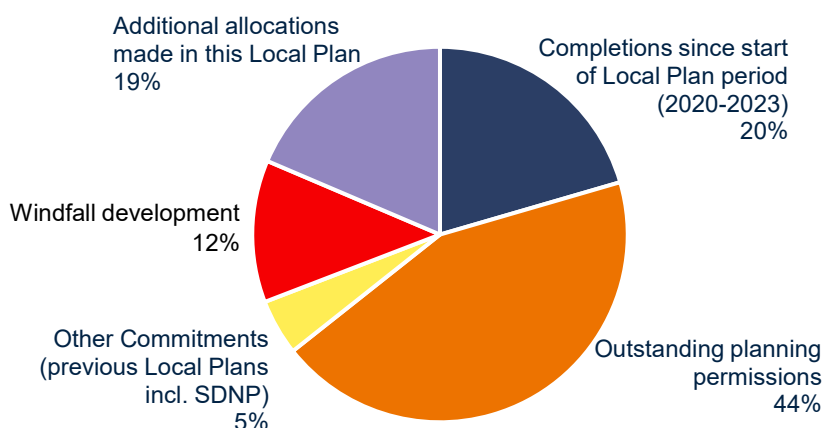
Comments on The Historic Environment

- 2.72. The R19 LP recognises that the historic environment of Winchester district has a wealth of iconic heritage assets that are a major cultural and environmental strength of the district and are important contributors to the character and significance, local distinctness, and cultural identity of the individual settlements (paragraph 8.2). As such, it is required that development is located carefully in order to ensure that the character and significance of heritage assets and their settings are not adversely affected (key issue iii, page 192). Bloor is in support of this approach, however question the requirement for 14 separate specific heritage policies, some of which overlap and are unnecessarily prescriptive.
- 2.73. Bloor welcome the approach of Strategic Policy HE1 Historic Environment in recognising that a sound understanding of significance is needed in relation to development proposals. This is in line with the general aspirations of Section 16 of the NPPF.
- 2.74. Policy HE2 All Heritage Assets, is noted to be a conglomeration of paragraphs 200-201 of the NPPF, setting out the requirements of applicants in relation to assessment of the significance of heritage assets. Bloor however raise concern with the wording “*describing the significance of affected heritage assets and/or their settings*”. It is considered that this statement runs the risk that the ‘setting’ of a heritage asset could be attributed its own significance, whereas significance of an asset may derive *from* its setting (NPPG paragraph: 006 Reference ID: 18a-006-20190723). Bloor advise that the statement is amended to “*describing the significance of affected heritage assets including any contribution made by their setting*” which more closely reflects the language in NPPF paragraph 200.
- 2.75. Bloor note that policies HE3 Designated Heritage Assets, HE4 Non-Designated Heritage Assets and HE5 Protecting the Significance of Heritage Assets (designated and non-designated heritage assets) and Mitigating Unavoidable Harm, are reflections on paragraphs 205-208, paragraph 209 and paragraphs 210-211 of the NPPF respectively. The policies largely repeat the language of these paragraphs (almost verbatim). Bloor consider that these policies should be amended or removed as Local Plan policies should not repeat national policy or seek to duplicate existing non-strategic process and policies. While Bloor recognise that this does not bring into the question of soundness, it makes the Local Plan longer and more complex than is necessary.
- 2.76. Notwithstanding the above, as set out **Section 5**, one of the greatest benefits of Manor Parks is that its location and topography are such that any new strategic development will not adversely affect the setting of Winchester or the character and significance of other heritage assets. In a location such as Winchester this is a unique opportunity.

Comments on Homes for All

- 2.77. The R19 LP sets out that one of the aims of the Council Plan is to provide 'Homes for All' and the Government has also made it very clear that it wants to boost the supply of new homes, to about 300,000 homes per annum nationally (paragraph 9.1 of the R19 LP). 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**" [Savills emphasis added].
- 2.78. Paragraph 9.3 notes that the local housing need figure (of 676 dwellings per annum or 13,565 to 2040) should be treated as the **minimum** housing need. The Government introduced the standard methodology for Housing Need to provide a standard formula for the **minimum** number of homes expected to be planned for, in a way "*which addresses projected household growth and historic under-supply*" (Planning Practice Guidance, paragraph, 002, Ref: 2a-002-20190220). WCC has included an unmet needs allowance of 1,900 dwellings on top of the standard methodology figure to cater for neighbouring authorities. Bloor supports this approach of the consideration of the standard methodology as the minimum and the inclusion of an unmet need allowance, however, consider that due to the reasons set out in **Section 3**, WCC should plan beyond the minimum position and the standard methodology approach set out in the draft NPPF should be utilised and a higher unmet need provision provided in order for WCC to be truly able to claim that they are providing 'homes for all' in the midst of a national housing crisis.
- 2.79. Paragraph 9.6 sets out that the R19 LP sets out a development strategy based on a sustainable settlement hierarchy (informed by the Settlement Hierarchy Review). Bloor supports this approach, however, raises questions of how much weight was given to the hierarchy when site selecting and with the actual scoring within the settlement hierarchy, as such it is not considered that the R19 LP allocates development in the most sustainable locations. This is discussed within **Section 4** of this representation document alongside greater analysis of the spatial development strategy SP2.
- 2.80. Paragraph 9.20 refers to housing provision within the R19 LP, it is stated that "*Some 64% of the district requirement is met by dwellings that have either been completed or which already have planning consent. A further 12% are expected from windfall development over the Plan period and this is based on cautious assumptions derived from the Assessment of Windfall Trends and Potential 2021. Therefore, less than 25% of provision is from Local Plan allocations (either carried forward or new), giving a high level of certainty over the delivery of this additional housing*". The proposed housing supply is shown graphically on chart 1 below.

Chart 1: Proposed Housing Supply (Savills using WCC R19 LP)



- 2.81. The WCC draft R19 LP is therefore only planning for **2,875 dwellings in newly identified allocations**, just 19% of their total need (well below the 25% which WCC reference in paragraph 9.20 which itself would be deemed insufficient), with 69% coming from existing or completed permissions and commitments and 12% from windfall development, across their plan period at the height of the housing crisis, in an area with an affordability ratio of 13.19 (and rising house prices), which is well above the Hampshire 10.14, the south-west 9.27 and England 8.26 average ratios.
- 2.82. Bloor note that without including more strategic allocations, WCC will be unlikely to be able to demonstrate a 5YHLS from the period of April 2025 to March 2030, as evidenced by the technical work by Intelligent Land appended to this representation (see **Appendix 2**). Bloor do not consider that this is positive planning in accordance with the NPPF and PPG and therefore **object** to Strategic Policy H1 (housing provision).
- 2.83. Policy H5 (meeting housing needs) 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 basis 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. Policy H5 is noted to require schemes of fifty dwellings or more to include an element designed and marketed to meet the needs of older persons, or other local specialist needs. Bloor do not object to the requirement to deliver specialist housing, however, emphasise the importance of provision being in line with local needs, market intelligence and site viability. An assessment produced by Tetlow King Planning, on behalf of Bloor, reveals a significant provision of suitable specialist housing schemes for older people within a 5km radius of the site. Therefore the immediate local populations needs are considered to be met and Bloor consider that specialist accommodation would not be required on site.

2.84. At Policy H6 (affordable housing), the WCC R19 LP 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”.

2.85. Bloor support the provision of affordable housing to reflect evidenced local need within the SHMA. Due to the reasons explored in **Section 3**, Bloor do not consider that the R19 LP as drafted would deliver sufficient affordable housing under the mechanisms of Policy H6. Further, it is considered unrealistic to expect developers to provide in excess of 40% affordable housing alongside cumulative costs of all other development and mitigation/infrastructure, as inferred in WCCs own viability evidence at paragraph 3.14 of the Local Plan Viability Report (July 2024), and therefore the only method to ensure that the WCC Local Plan delivers affordable housing in line with their local need is to increase the total district housing provision in line with the draft NPPF standard methodology requirement (see **Section 3**). WCC’s argument against this set out in their Housing Topic Paper is to counter this position by stating that the SM “bakes” in affordable housing through the affordability uplift. In an area so chronically short of affordable housing (which is referenced throughout the Local Plan) and rising house prices as evidenced in this Representation, this is not sound especially given only the minimum figure has been included in the housing requirement. This is explored further in **Section 3**.

Comments on Creating a Vibrant Economy

2.86. The R19 LP sets out the importance of developing a greener, more sustainable, and inclusive economy, in line with its ambition for the Winchester district to be carbon neutral by 2030 (paragraph 10.1). Bloor supports this objective and the Green Economic Development Strategy WCC has developed which sets out the direction for the next 10 years.

2.87. Paragraph 10.31 sets out that the R19 LP will seek to support the economy by providing support a digital economy and a more geographically diverse economy, including self-employment and home working, by supporting digital infrastructure (e.g. broadband) co-locating hubs across the district and developing sustainable transport options. These actions support the creation of sustainable 20-minute neighbourhoods throughout the plan area.

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- 2.88. Resultant of this growth ambition, paragraph 10.32 notes that all large-scale planning applications (10 or more houses/1000sq.m plus floor space) will be required to enter into an employment and skills plan to provide a range of employment, volunteering, apprenticeship, training and development opportunities for local people, particularly those that enhance green construction skills, such as the installation of insulation, ventilation, heat pumps and solar panels.
- 2.89. Bloor notes that, as demonstrated at **Section 5**, Manor Parks can deliver against all these objectives and any future planning application would be supported by an employment and skills plan, and thus contribute significantly to this aspect of the Local Plan vision.

3. Why More Housing

- 3.1. The draft R19 LP sets out that the standard methodology (dated March 2024) dictates a local housing need for WCC at 676 dwellings per annum. WCC used a stepped standard methodology approach based on historic standard methodology requirements for the years 2020-2021 (685 dwellings); 2021-2022 (666 dwellings); 2022-2023 (707 dwellings) and; 2023-2024 (691 dwellings) to calculate a total need of 13,565 dwellings over the proposed plan period to 2040. The R19 LP includes an unmet needs allowance (for unmet need in neighbouring authorities) of 1,900 dwellings, taking the total housing requirement for WCC to 15,465 dwellings. Approximately 350 dwellings of this requirement will be provided within the South Downs National Park part of the Winchester district. Bloor considers that, due to an array of reasons, the provision of 15,465 dwellings up to 2040, is insufficient and will leave the plan unsound. Explanation on this is set out below.
- 3.2. Strategic Policy 2 (SP2) of the R19 LP sets out the spatial strategy of development, this policy and distribution is discussed at **Section 4**.

The Plan Period

- 3.3. The WCC R19 proposed plan period is (1 April) 2020 to (31 March) 2040 (20 years). The WCC LDS, published in 2023, anticipated that Regulation 19 Consultation would occur in July to September 2024, with submission to the Planning Inspector in October to December 2024 and adoption estimated to be October to December 2025. Bloor raise two concerns with the proposed plan period (a) the plan period should be forward looking and (b) the plan period should have a 15 year period from adoption. Each of these points are summarised below.

Forward Looking Plan Period

- 3.4. As above, the WCC R19 LP has a period starting in 2020. Bloor, dispute the inclusion of a 5 year period before the point of adoption as the purpose of a Local Plan is to manage future development in the district. The Council's reason for this is set out in paragraph 2.3 of Housing Topic Paper and that this is expressly to include high levels of recent delivery to be taken into account in this local plan. Paragraph 2.4 goes on to state that this is necessary as the NPPF makes no specific provision for past over supply to be taken into account and the Council does not want this over provision to be "*lost*".
- 3.5. Bloor considers the plan period should start from 2024, the year of R19 consultation when the housing requirement is determined. While Bloor recognise that this would shorten the plan period, the WCC approach fundamentally misunderstands the standard method which takes account of past supply through the affordability uplift to determine housing needs moving forward. This is clear from paragraph 2a-005 of the PPG which notes that when setting the baseline for the standard method the current year is used as the starting point for calculating growth. This approach was endorsed by Inspector David Reed within paragraph 6 of his post examination hearings letter on the North Norfolk Local Plan Examination date 24 May 2024.

- 3.6. As set out in **Section 2**, 3,170 new homes of the total district housing provision 15,464 new homes, c. 20% are being provided from completions since the start of the Local Plan period (2020-2023). As above, Bloor do not consider that these years or provision should be included within the Local Plan.
- 3.7. If the standard method (which we discuss below), is used for the plan period of 2024 – 2040, WCC would have a need of 10,816 dwellings (676 dpa X 16). Once you remove the historic completions of 3,170 new homes from the total provision, WCC would have a supply of 12,295 dwellings. While this is clearly sufficient to address their own needs, it is not sufficient to address the unmet need allowance of 1,900 (which we discuss below) less the 350 dwellings to be provided within the South Downs National Park, which generates a total housing need of 12,366. A shortfall of 71 dwellings would exist. See calculation below.

Calculation:

$$\begin{aligned} & \text{Standard method need (2024-2040) (676 X 16) = 10,816} \\ & \text{Total need (10,816), + PFSH unmet Need (1,900) - SDNP provision (350) = 12,366} \\ & \\ & \text{Current R19 LP Housing Provision (2020-2040) = 15,464} \\ & \text{Amended R19 LP Housing Provision (2024-2040) (15,464 - 3,170 (past completions) = 12,295} \\ & \\ & \text{Shortfall - 12,366 (total need) - 12,295 (total supply) = 71} \end{aligned}$$

Fifteen–Year Period from Adoption

- 3.8. The NPPF states (paragraph 22) (our emphasis added):
- “Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. ...”*
- 3.9. It is essential to appreciate the language used in paragraph 22, which expresses the 15-year period as an unambiguous minimum and arguably it should be exceeded where possible. The current plan period allows for the 15-year period assuming adoption occurs as scheduled.
- 3.10. Potential delays are anticipated not only if the Plan isn’t sound and modifications are requested but also due to the increased volume of Local Plan being submitted to the Planning Inspector in light of the draft NPPF, it is considered that the pause before Examination commenced could be longer than anticipated by WCC meaning adoption should shift into 2026.
- 3.11. It is recommended that, to allow for the potential for delays, the Local Plan covers a period to 2041. As a result, the housing requirement should be increased by an additional 676 dwellings per annum (dpa) if using the current standard method. Of course, any further delay of the adoption would need to extend the plan period accordingly to be in accordance with paragraph 22 of the NPPF.

The Resultant Plan Period

- 3.12. Based on the points raised above, Bloor considers that the WCC Local Plan should have a plan period of 2024 – 2041 (17 years). Using the current standard method, this would generate a housing need of 11,492 dwellings, which alongside the unmet need allowance of 1,900 less the 350 dwellings to be provided within the South Downs National Park, would result in a total district housing requirement of 13,042 dwellings. When considering this against the identified housing provision (minus completions in years removed from the plan period) of 12,295 dwellings as set out in Table H1, WCC would have a shortfall of 747 dwellings. See calculation below.

Calculation:

$$\begin{aligned} & \text{Standard method need (2024-2041) (676 X 17) = 11,492} \\ & \text{Total need (11,492) + PFSH unmet Need (1,900) - SDNP provision (350) = 13,042} \\ & \text{Current R19 LP Housing Provision (2020-2040) = 15,464} \\ & \text{Amended R19 LP Housing Provision (2024-2040) (15,464 - 3,170 (past completions) = 12,295} \\ & \text{Shortfall - 13,042 (total need) - 12,295 (total supply) = 747} \end{aligned}$$

- 3.13. However, due to the reasons outlined within this section, Bloor consider that WCC should either be planning in line with: (a) their draft standard methodology requirement of 1,099 dpa or (b) their average past completion rate of 996 dpa.
- 3.14. For the amended plan period, option (a) would generate a housing need of 18,683 dwellings and option (b) would generate a housing need of 16,932 dwellings, which when including the unmet need allowance of 1,900, less the 350 dwellings to be provided within the South Downs National Park, would result in a total district housing requirement of (a) 20,233 dwellings or (b) 18,482 respectively. As above, WCC for these years have a supply of 12,295 dwellings, therefore a shortfall of 7,938 dwellings would exist under option (a) and a shortfall of 6,187 dwellings would exist under option (b). WCC should be planning to meet this need within this Local Plan. See calculations below.

Calculations:

OPTION A – New Standard Method

$$\begin{aligned} & \text{Standard method need (2024-2041) (1099 X 17) = 18,683} \\ & \text{Total need (18,683), + PFSH unmet Need (1,900) - SDNP provision (350) = 20,233} \\ & \text{Current R19 LP Housing Provision (2020-2040) = 15,464} \\ & \text{Amended R19 LP Housing Provision (2024-2040) (15,464 - 3,170 (past completions) = 12,295} \\ & \text{Shortfall - 20,233 (total need) - 12,295 (total supply) = 7,938} \end{aligned}$$

OPTION B – Past Completions

Historic delivery rate (2024-2041) (996 X 17) = 16,932
Total need (16,932), + PFSH unmet Need (1,900) - SDNP provision (350) = 18,482

Current R19 LP Housing Provision (2020-2040) = 15,464
Amended R19 LP Housing Provision (2024-2040) (15,464 - 3,170 (past completions) = 12,295

Shortfall - 18,482 (total need) - 12,295 (total supply) = 6,187

- 3.15. For the purpose of the above, the current unmet need allowance of 1,900 has been included, however as explained in the section below regarding unmet need, this allowance should be much higher which would increase shortfalls further under both option (a) and (b).

Standard Method

- 3.16. In 2017, the Government published a number of key documents relating to future housing need and growth within the UK. This was supported in September 2017 by the 'Right Homes in the Right Places' consultation, which included a new standardised methodology for calculating the Objectively Assessed Need (OAN) for every Local Planning Authority (LPA) in the country. Following the consultation, the calculation was accepted, and become known as the standard method for housing need.

- 3.17. The National Planning Policy Framework (NPPF), revised in 2023 states:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for" (paragraph 61) [our emphasis added].

- 3.18. And:

"Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period." (paragraph 67).

- 3.19. WCC do not contend that they have any 'exceptional circumstances' as referenced in paragraph 61 of the NPPF which would allow deviation from the standard method as the basepoint for the housing requirement.

The use of the standard method is welcomed, however, this should be seen as a minimum figure, and local evidence, as well as the strategies contained within the emerging local and national policies (namely the draft NPPF), indicate that a higher figure would be appropriate for the plan period.

- 3.20. The Planning Practice Guidance (PPG) clearly states that the standard method identifies a minimum number of homes to be planned for (paragraph 001 Reference ID: 68-001-20240205). The PPG continues by stating: *“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates”* [010 Reference ID: 2a-010-20201216, our emphasis added]. The other reasons why Bloor consider that a requirement above the standard method is appropriate are explained below.

The New Standard Methodology

- 3.21. On the 30th of July 2024, the new Labour Government published a draft version of the NPPF, which is undergoing consultation until 11:45pm on 24 September 2024. The draft NPPF contains a number of key amends, principally related to focusing on a bold strengthening of drive to meet housing and other development needs. This includes a revision as to how the standard methodology is calculated.
- 3.22. The current standard method is calculated using a complex formula, based on a four-step approach:
1. Using the 2014-based household projections, take the 10-year average growth rate (with the current year being the base year).
 2. Apply an uplift, based on the latest median workplace-based affordability ratio (formula set out in national guidance).
 3. Apply a cap, where appropriate. Where the strategic policies for housing in the current plan are less than five years old, cap the need (from steps [1] and [2]) at 40% above the current plan requirement. Where more than five years old, cap the need at 40% above whichever is higher of the current plan requirement or household projections; and
 4. [For the 20 largest urban areas nationally] – apply a further 35% uplift to step [3].
- 3.23. The approach came under scrutiny from LPAs for reliance on historic data and being overly complex. Labour have sought to simplify the formula to a two-step stock-based approach:
1. Take 0.8% of the current housing stock of the area.

2. Apply an uplift, based on a three-year average of the median workplace-based affordability ratio, with an increase of 15% for every unit above four.
- 3.24. For Winchester, the revised standard methodology formula, results in a per annum requirement of 1,099 dwellings, a c.63% increase from 676 dwellings based on the adopted standard methodology. Using WCC's stepped standard methodology approach and their plan period as proposed (2020 – 2040) based on historic standard methodology requirements for the years 2020-20212 to 2023-2024 (of 685, 666, 707 and 691 dwellings per annum respectively) and the new standard method requirement for the years 2024 to 2040 the LP housing requirement would be **20,333 dwellings**. This is an increased need of 6,768 dwellings from that proposed in the R19 LP. As above, if the plan period was amended as advised by Bloor to 2024-2041, WCC would have a LP housing need of **18,683 dwellings**. These figures are noted to be before an unmet need allowance is added.
- 3.25. This increased requirement is in line with the Governments request for *“every local planning authority to rapidly create a clear, ambitious local plan for high quality housebuilding and economic growth”* [Source: Proposed reforms to the National Planning Policy Framework and other changes to the planning system].
- 3.26. The draft NPPF reverse the changes made under the December 2023 NPPF to paragraph 61 (which is now paragraph 62), that the outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area is a positive step-forward to give certainty and clarity on the issue of planning for housing need and requirement. Furthermore, the reference to alternative approaches to assessing housing need have been removed. Bloor express that this is critical for plan-making and decision-making in the planning system if we are to achieve delivery of 1.5m new homes over the next 5 years (or 300,000 per annum).
- 3.27. The revised standard method produces an overall housing requirement for England of 371,000 homes per year, a 22% increase against the current method. While this is significantly higher than the 300,000 homes per year target, work undertaken by Savills Research has shown that approximately 25% of planning consents granted nationally over the past 10 years have not been implemented. To reach 300,000 homes while accounting for this fall through rate, each new home delivered would require 1.35 planning consents. The 371,000 home requirement is therefore needed to be embedded in local plan targets as quickly as possible to ensure that delivery volumes have a chance to reach 300,000 homes per year. The draft method broadly allocates homes in the areas where they are most needed, such as Winchester.
- 3.28. The impact of the draft standard method will be tempered by the transitional arrangements outlined in Annex 1. While over 75% of local planning authorities (LPAs) will have to eventually adopt a higher housing requirement than they currently have in place, Savills Research suggests it will take at least five years for local plan targets to exceed the government's aspiration of 300,000 new homes per year.
- 3.29. Where a LPA has an up to date local plan, the new proposed method will not apply straight away for decision making. But it will for the preparation of a new plan, once the current one is out of date. There are currently 84 LPAs (28%) in this position. Around a quarter will become out of date in 2025, but by 2028 there will still be at least 30 LPAs with up to date plans that use housing targets derived from the previous

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standard method. This has knock-on implications for the number of sites these LPAs will have to identify in their 5-year housing land supply, and the standard that they will be held to in the Housing Delivery Test.

- 3.30. Furthermore, LPAs currently well progressed towards adopting a new plan will also be able to continue using the old standard method if the transitional arrangements stay as drafted. There are currently 40 LPAs at examination, and a further 16 at R19 stage, such as Winchester, with the prospect of submitting for examination before the draft NPPF is introduced. These plans have combined emerging targets of 48,437 homes per year, but their annual housing need under the new standard method would be over 82,000 homes, equivalent to 22% of England's total requirement.
- 3.31. As a consequence, even by the end of the current parliament, **there will still be LPAs that will not have adopted local plans using the new standard method.**
- 3.32. These varied provisions for transitions mean that Savills Research expect the combined total of local plan annual targets will remain around 250,000-260,000 homes until 2027, and will only exceed the government's delivery target of 300,000 from the end of 2029.
- 3.33. WCC and 15 other authorities to date seeking to push through their Local Plans goes against the messaging from Government to both Councils and the Planning Inspectorate to build the housing pipeline, take the tough decisions and simply not push the problem down the road.
- 3.34. While Bloor recognise the transitional arrangements set out in Annex 1 and the draft status of the NPPF, it is considered that ignoring the requirements to plan for increased growth of c. 7,000 more dwellings (within the current plan period) or c. 6,000 more dwellings (if the amended plan period is adopted) to avoid delivering the much-needed homes in an area with a growing affordability crisis is not in the spirit of the housing growth agenda being delivered by the new Government and is just "kicking the can" down the road for a number of years when WCC say they will start an early Review of the Local Plan. This decision means WCC will be failing the younger population at both a district and sub regional level. If WCC do choose to proceed on this basis, Bloor consider that a strong review policy is required that set out clear dates as to when a new plan will be submitted, and the consequences should that plan not come forward in the agreed timescale. As within the HBF representation, Bloor consider that a policy is included within SS1 along the lines of that adopted in the Bedford Local plan 2030, which was included due to similar circumstances when the NPPF was amended in 2018 requiring the use of the standard method to assess housing needs.
- 3.35. Bloor express that, even if the Local Plan is submitted to examination and is subsequently found unsound or has to be withdrawn, or WCC is required to begin immediately progressing a new Local Plan under the new plan making system, the transitional arrangements would delay the adoption of a new plan until at least 2029, compounding the identified shortfall. Therefore Bloor consider that WCC should be proactively increasing their planned housing requirement under Strategic Policies SP2 (Spatial Strategy and Development Principles) and SP H1 (Housing Provision) in the current draft R19 LP, without these amends, Bloor **object** to policies SP2 and H1 on the basis that they are not sound, as the Local Plan is not positively prepared and will not be consistent with national policy by the time it is at Examination.

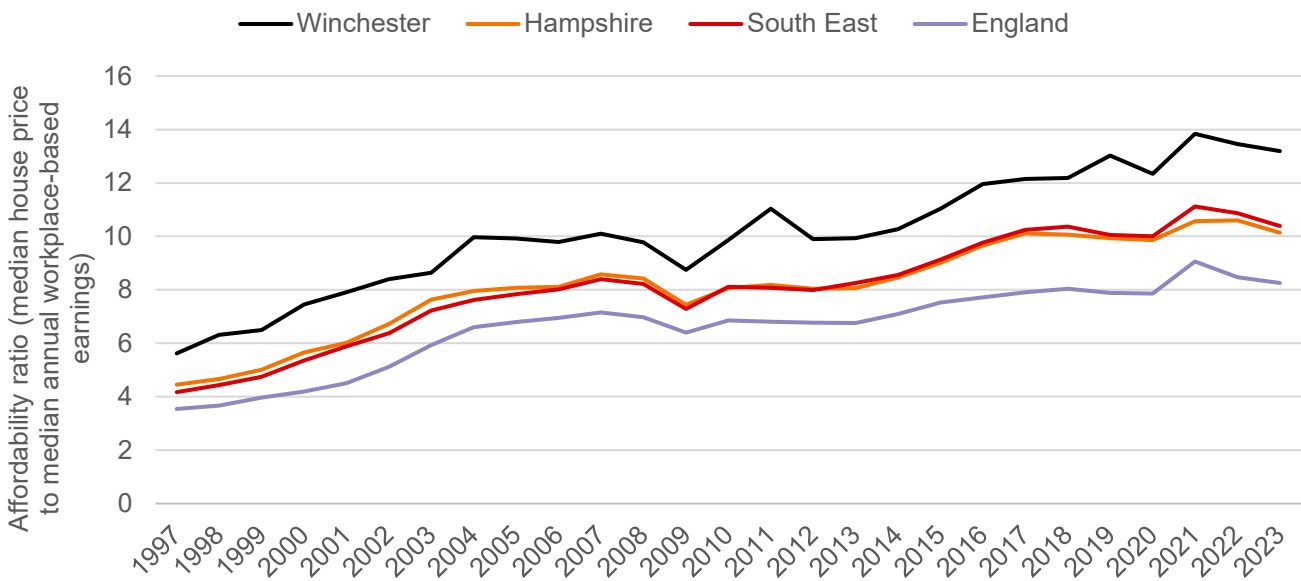
Affordability

- 3.36. The affordability of Winchester is one reason that a higher housing number should be sought in the emerging Local Plan. The R19 LP recognises this issue at both paragraph 1.2 bullet two “*We also face a challenge of affordability. It’s ever harder for all ages, and especially younger people, to find a suitable house they can afford*” and paragraph 9.36 “*the affordability of housing in Winchester district continues to be a major issue and therefore the delivery of affordable homes remains a critical priority of the new Local Plan*”.
- 3.37. The affordability ratio, published by the Office for National Statistics (ONS)² is based on the house price to workplace-based earnings for each LPA, it is an up-lift factor in both the current and emerging standard methodology calculations as set above. While Savills and Bloor recognise this calculated up-lift, it is considered that the need in Winchester is so great that an uplift in housing numbers is also necessary to provide sufficient affordable dwellings over the plan period. This is evidenced below from review of the ONS affordability ratios, locally and nationally, and the increased draft standard method requirement which dictates that the highest proportional delivery is concentrated in areas where there are indications that there is the demand to absorb the higher volumes of housebuilding.
- 3.38. Winchester is one of the least affordable housing markets in the country with increasing house prices above the regional average. In 2023 the affordability ratio (median house price to median workplace based earnings, published in March 2024) was 13.19, which is in the highest forty authorities in the country (330 in total) and is in the highest 20 authorities outside of London. In comparison, the average 2023 affordability ratio for Hampshire was 10.14, for the South East was 10.39 and for England was 8.26.
- 3.39. In Winchester housing has become increasingly unaffordable as demonstrated in Figure 3 (**shown in black**). The affordability ratio (median house price to median workplace based earnings) increased from 5.2 in 1997 to 9.9 in 2012 to 13.8 in 2021. Although there were minor improvements in the affordability ratio in the last two years this has been a period when mortgage rates have increased significantly, house prices have still risen in Winchester and Winchester still remains significantly more unaffordable than in Hampshire (**shown in orange**), the South East (**shown in red**) and England (**shown in purple**). The gap between Winchester and the other areas has increased over time which shows it has disproportionately become more unaffordable than the county, regional and national average. In 2012 the affordability ratio in Winchester was 1.9 more than Hampshire and 3.1 more than England whereas in 2023 it was 3.1 more than Hampshire and 4.9 more than England.

²<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian/current/ratioofhousepricetoworkplacebasedearnings2.xlsx>



Figure 3: Affordability Ratio 2012 – 2023 [Source: ONS]



3.40. Despite more challenging housing market conditions, house prices in Winchester have continued to rise in the last year, contrary to the performance of the country, regional and national average. In the 12 months to June 2024 house prices in Winchester increases by 3.3% compared to falls in Hampshire, the South East and England of -2.2%, -2.3% and -1.0% respectively, according to Savills using Land Registry data (using a 6 month smoothed repeat sales index). This shows that homes in Winchester continue to demand higher values whilst other markets have been weaker.

3.41. Additionally, since the 2007/08 peak, house prices in Winchester have increased to a greater extent than the county, regional and national averages as shown in Figure 4. House prices in June 2024 were 58% higher in Winchester than they were at the peak of the market in 2007/08. This compares to just 49%, 54% and 47% in Hampshire, South East and England. It shows that house price growth has been very strong and remained resilient adding to the affordability challenges of the local authority.

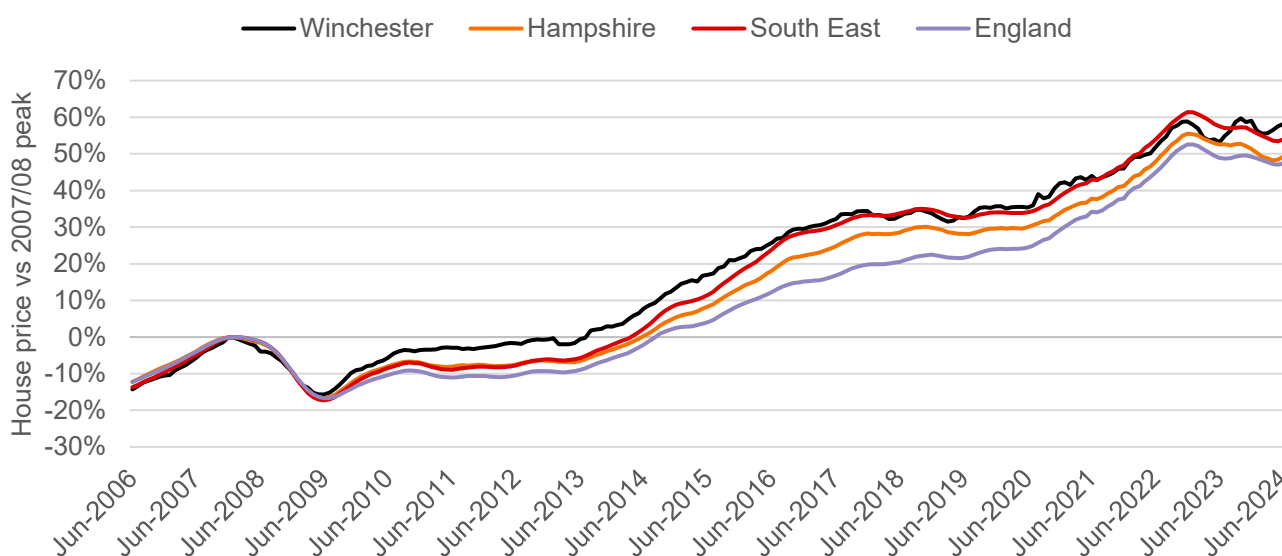
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Figure 4: House Price Growth 2006 – 2024 [Source: Savills using Land Registry]



3.42. In Winchester house prices are much higher than the regional and national average as demonstrated on figure 5. On average homes in Winchester sold for £589,418 in the last year, 29% higher than in the South East (where values average £456,596) and 63% higher than in England and Wales (where values average £361,671). House prices are therefore much higher in Winchester than other areas putting significant pressure on the affordability of homes in Winchester.

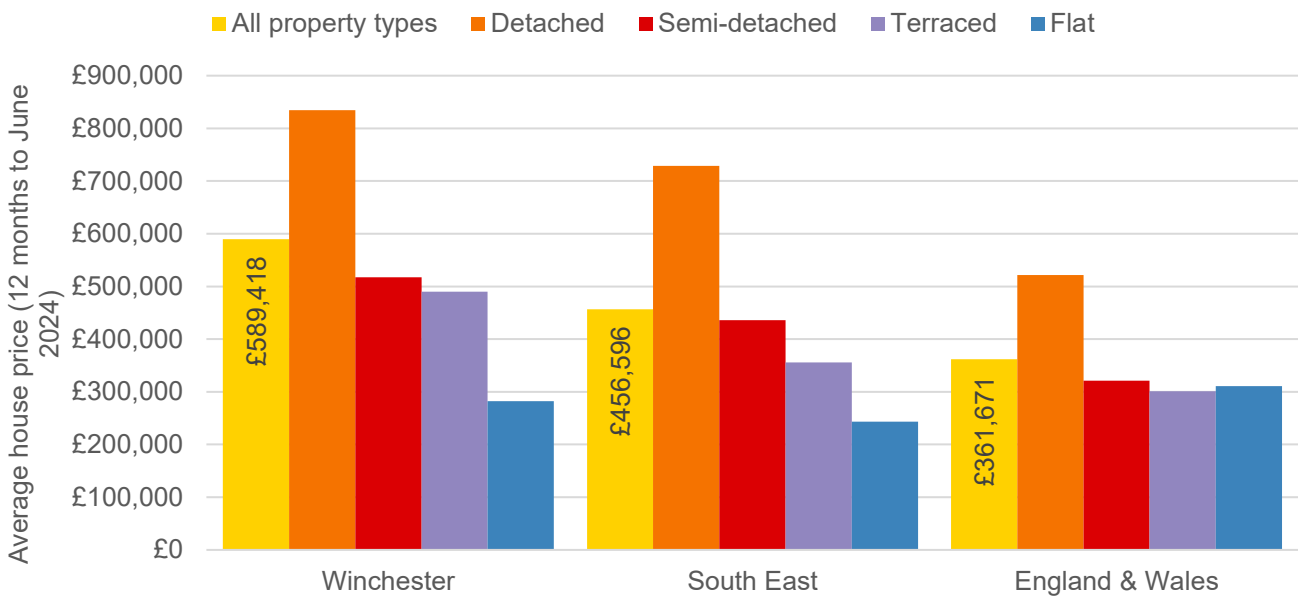
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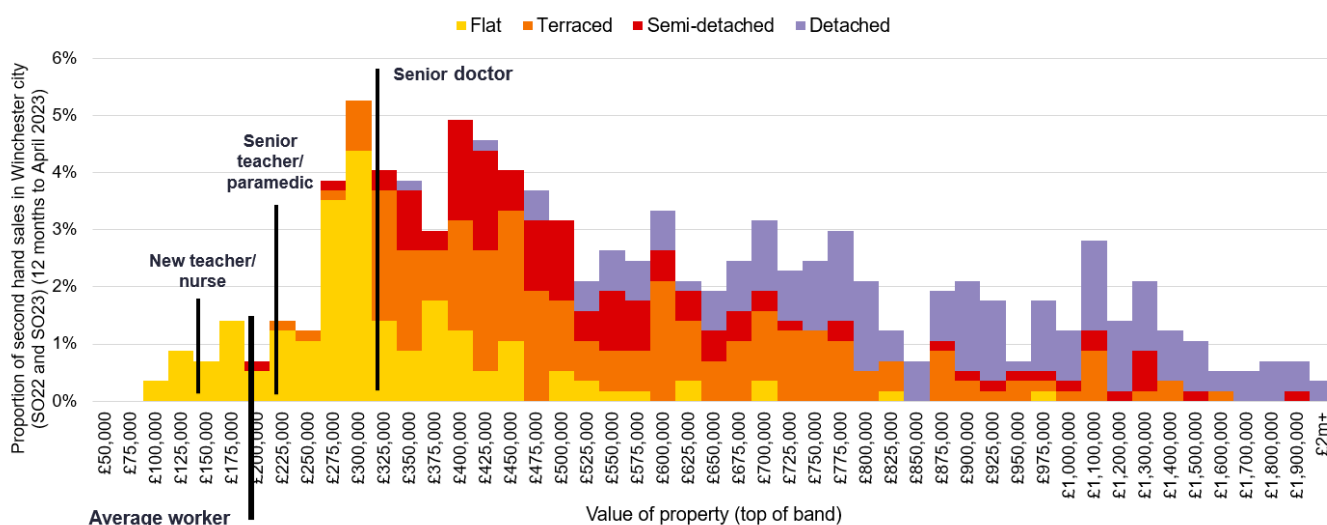
Figure 5: Average House Prices [Source: Savills using HM Land Registry]



- 3.43. Therefore, whilst the use of the standard method is welcomed, there should be more emphasis that this is a minimum figure and a starting point. As a minimum, it is considered that an uplift should be applied to reflect the poor affordability in Winchester. WCC should proactively plan for a requirement nearer the draft standard methodology requirement to address this affordability crisis head on.
- 3.44. Bloor instructed Savills Research to produce a report regarding the Winchester housing market and trends resultant from affordability. Noting the findings shown on figure 5, Savills Research reviewed the district level variation in house price using Land Registry data, which revealed in the 12 months to June 2023, house prices in Winchester Town (£645,000) were substantially higher than on average across the whole of the Winchester district (£592,000).
- 3.45. Due to the higher values of these house prices in Winchester Town, the average earner in the area can afford to buy very little of the housing in the city, with only a few of the lowest value flats within their price range based on standard assumptions of affordability (25% deposit and a loan of four time their annual income) as shown in Figure 6. Key workers such as new teachers and senior teachers can also afford to buy very little of the housing stock in Winchester Town, with even some doctors only just able to afford the cheapest houses in the city based on these assumptions.



Figure 6: Distribution of House Prices in Winchester Town Compared to How Much Key Workers Could Afford [Source: Savills using NHS, ONS, Land Registry]



- 3.46. This means that local workers are forced to move out to find homes that are affordable and suitable for them. This is evidenced by the statistic that c. 40% of the total district employment provision is within Winchester Town but just 24% of the economically active population live in the city [Source: ONS]. There are 15,000 key workers in the local authority and the majority of public sector jobs (66%) are within Winchester City. Combining, this information tells us that most key worker jobs are within the city, but many of these workers will be living outside of the City, especially given how much more expensive it is to live in Winchester city than some surrounding areas.
- 3.47. We also see this trend in households moving out of the city to neighbouring areas with lower house prices, as shown in the maps in Figure 7. Only 25% of the households stay within the city on moving, with 53% moving outside of the district (commonly to Eastleigh and Southampton), and 22% elsewhere within the district (commonly to places such as Shawford and Colden Common (see Figure 7). As demonstrated in Figure 7 below, those moving out of the city are moving to lower value areas both in the district and neighbouring authorities.

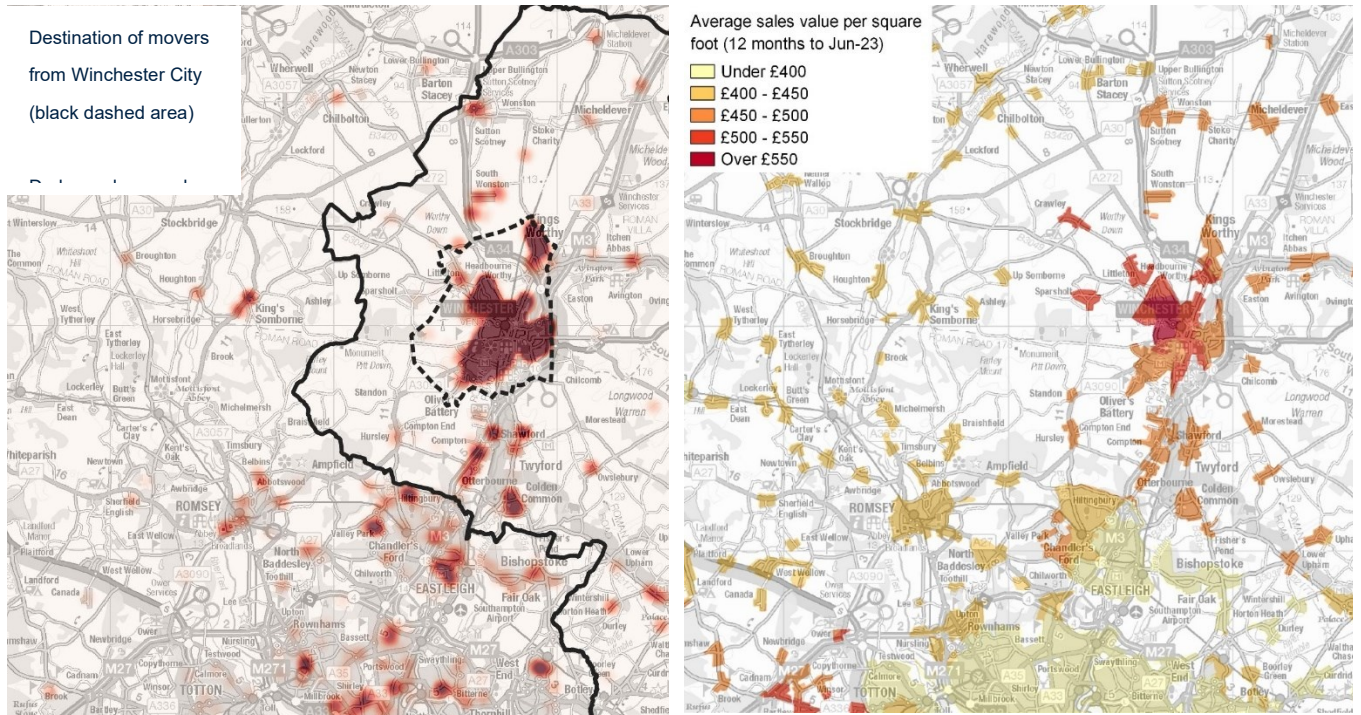
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Figure 7: Map of the destination of Movers out of Winchester Town (black dotted line) and Relative House Prices (price per square foot) in the wider Winchester area [Source: Savills using Experian, Land Registry and EPCs]



- 3.48. It is evident that affordability and affluence are intrinsic factors leading to the above movement patterns as, the average income of those moving within or into Winchester Town is £63,878, whereas the average income of those moving out of Winchester Town is 28% less at £46,280 [Source: Experian].
- 3.49. As well as the difference in incomes of households moving in and out of Winchester Town, there is a significant difference in the types of household in each of those groups. Figure 8 shows that Winchester has a significant proportion of the most affluent household type – Prestige Positions shown in purple – living within the city. A similar proportion move to the city, with relatively low proportion moving out. However, the chart also shows that relatively few Aspiring Homemakers live in the city (less affluent couples and young families who typically seek to buy their first home or move to a larger home as their family grows). Although a higher proportion move into the city, an even higher proportion move out of Winchester Town. This is likely due to the factors outlined above, i.e. the need to move out of the city to find affordably priced, suitable housing for their household.

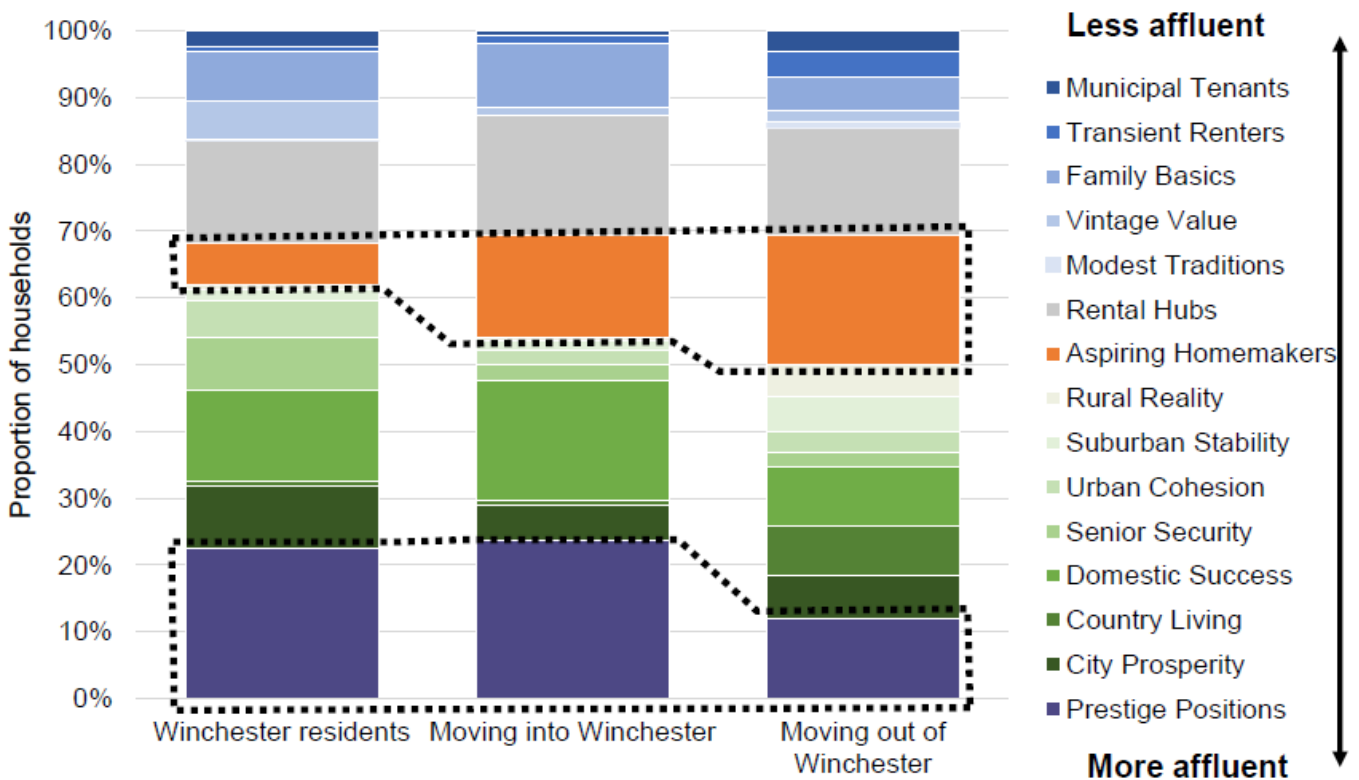
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Figure 8: Different Types of Households Living in and Moving in and out of Winchester Town [Source: Savills using Experian]



Historic Delivery vs. Future Trajectory

3.50. As set out above, the WCC R19 LP is planning for need based on the current standard methodology, for the remainder of the plan period this means a provision of 676 dpa. In addition to the reasons highlighted above, and later within this section, Bloor consider that this is wholly inappropriate as it is significantly below the historic delivery. For example, in 2020-2021 804 new dwellings were delivered, this rises to 1,141 new dwellings in 2021-2022 and 1,044 in 2022-2023. Suppressing delivery by providing a negative trajectory will worsen affordability, which as evidenced above is already acute. The Government draft NPPF consultation website evidences that they will not support this approach at paragraph 20 where they note “We are also proposing to remove the wording on past oversupply in paragraph 77, which was introduced to set out that previous over-supply could be set against upcoming supply. Given the chronic need for housing we see in all areas, we should celebrate strong delivery records without diluting future ambitions” [our emphasis added]. The R19 LP can therefore not be considered to be positively prepared and is contrary to the messaging from central Government.



- 3.51. The Housing Topic Paper (2024) at paragraph 6.4 sets out that “the draft Local Plan’s housing trajectory (Table on page 231 of the Plan) expected high completion levels of over 1000 dwellings per annum to be maintained in most years until about 2026/27, then falling to 700-900pa up to 2030/31 and 500-600pa in most years to the end of the Plan period (by which time it has fallen to 200-300pa)”. As set out above and throughout this representations, as per the messaging from central government, WCC should be planning positively for growth, allocating sites which only provide homes in line with local housing need until 2030/31 is fundamentally wrong. Furthermore, it is clear that a step-change is needed in delivery, from the early review which will be required upon publication of the draft NPPF, which will be very significant and on this basis it is irrational for WCC to hold back sites which they consider to be sustainable until later in the plan period.
- 3.52. Based on the above, Bloor note that as a minimum, if the new draft NPPF standard method is not planned for within the R19 LP (referred to as option (a) within this document), WCC should be planning for at least 996 homes per year in line with their average delivery from 2020 to 2023 (referred to as option (b) within this document). For the current plan period (1 April) 2020 to (31 March 2040), using a requirement of 996 dpa for remaining years of the plan (16 years), WCC would have a housing need of 18,685 dwellings. See calculation below. When utilising the revised plan period of (1 April) 2024 to (31 March 2041) as proposed by Bloor above, WCC would have a housing need of 16,932 dwellings (996 X 17 years). These numbers are before the unmet need allowance of 1,900 is accounted for.

Calculation:

$$\begin{aligned} 2020 - 2021 - 685 \times 1 &= 685 \\ 2021 - 2022 - 666 \times 1 &= 666 \\ 2022 - 2023 - 707 \times 1 &= 707 \\ 2023 - 2024 - 691 \times 1 &= 691 \\ 2024 - 2040 - 996 \times 16 &= 15,936 \end{aligned}$$

$$\text{Total need} = 685 + 666 + 707 + 691 + 15,936 = 18,685$$

The Buffer / Non-Implementation

- 3.53. The WCC R18 LP included a buffer of 1,450 new homes on top of the standard method required, Bloor note that this buffer has now been removed from the R19 LP, this is considered to be inappropriate as the buffer would allow for market fluctuation, flexibility or non-delivery and argued that the NPPF requires this.
- 3.54. Bloor understand that the R19 LP ‘sets’ the housing requirement, a buffer should be included due to the implications of non-implementation on housing delivery. As set out above, at paragraph 3.26 Savills Research confirm that approximately 25% of planning consents granted nationally over the past 10 years have not been implemented, therefore including a buffer of a minimum of 10% would help to ensure that identified housing need is actually delivered. The threat of non-delivery under the R19 LP as drafted is significant as WCC are reliant on a small number of sites. This includes Sir John Moore Barracks, which

was initially noted to be released in 2022 and is now scheduled to be released in 2026; there is a real possibility for this to be delayed further, supposedly providing up to 1,000 homes. Heavy reliance is also placed on carried forward sites, such as the Winchester Central Regeneration Area and the Central Regeneration Area, which have not successfully been delivered under the adopted Local Plan, supposedly providing 550 new homes. Furthermore, WCC has not provided sufficient delivery evidence on a site by site and year by year basis to demonstrate certainty as is required by paragraph 75 of the NPPF. Bloor therefore dispute, the statement that *“it is not necessary to include a ‘buffer’ to allow for non-delivery”* due to less than 25% of the required provision coming from new allocations, a matter we covered separately in **Section 2**. On this basis Bloor **object** to Strategic Policy H1, on the grounds of soundness as it is not planning positively for growth.

Housing Land Supply

- 3.55. The latest housing supply information published by the Council is contained in the Annual Monitoring Report (AMR) covering the period to the 1st of April 2023. Intelligent Land, at **Appendix 2**, has reviewed progress on the delivery of key sites identified by the Council as of August 2024. Overall, Intelligent Land consider that 564 dwellings do not meet the NPPF requirement for inclusion within the five-year housing land supply. Additionally, the Council assessment of large sites without planning consent identifies additional dwellings which could potentially contribute to the five year supply. However, the Council does not include these in its five year assessment as they do not meet the NPPF deliverability test.
- 3.56. The Council has recognised the overall available supply will be lower for the five years from 2024 than for the five years from 2023. Intelligent Land agree this is likely, but also consider the overall available supply is lower than estimated by the Council. Intelligent Land conclude that based on the current NPPF, WCC consider that for the period of April 2024 to March 2029 that they have a housing land supply of 5.7 years, Intelligent Land dispute this and confirm WCC will have a supply marginally of 5.0 years.
- 3.57. When considering the impact of the draft standard method under the draft NPPF as above, Intelligent Land consider that WCC would state a housing land supply of 3.34 years for the period of April 2024 to March 2029, however Intelligent Land dispute this and confirm WCC will have a supply of 2.93 years. Bloor considers that this demonstrates to the Council the fundamental requirement to plan for more deliverable homes to protect themselves from future speculative applications. Further detail on housing supply can be found in **Appendix 2**.

Affordable Housing

- 3.58. The R19 LP states in multiple locations that the delivery of affordable housing is key, including in the Foreword which notes *“we also face a challenge of affordability. It’s harder and harder for all ages, and especially younger people, to find a suitable house they can afford”* (paragraph 1.2) and on page 227 which states *“the affordability of housing in Winchester district continues to be a major issue and therefore the delivery of affordable homes remains a critical priority of the new Local Plan”* (paragraph 9.36, Savills emphasis added).

- 3.59. The WCC Housing Topic paper (July 2024) addresses housing affordability at paragraphs 3.16 to 3.22. Paragraph 3.17 of the paper sets out “*The NPPF advises the use of the Standard Method (paragraph 61) and that ‘within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing ...’ (NPPF para 63). The reference to ‘within this context’ indicates that provision for affordable housing should be made within the SM housing figure, not in addition to it. This is reinforced by the application of an ‘affordability ratio’ to derive the SM figure*”.
- 3.60. Whilst it is noted that the standard methodology includes an uplift for affordability, the need in Winchester is so great that an uplift in housing numbers is also necessary to provide sufficient affordable dwellings over the plan period, this is demonstrated within WCC’s own evidence base and summarised below. Only adopting the minimal starting point isn’t addressing the lack of delivery.
- 3.61. The Winchester Strategic Housing Market Assessment Update (‘SHMA’) was published by Icenl in July 2024 to form part of the evidence base of the new Winchester Local Plan. In relation to affordable housing the SHMA looks at need within the 17-year period from 2023 to 2040 (paragraph 3.19).
- 3.62. The methodology used to estimate the rented affordable housing need within the SHMA reviewed the following:
- Current need: an estimation of the number of households who have a need now.
 - Gross Need: Projected newly forming households in need based on projections with an affordability test and estimating existing households that will fall into need.
 - Review of the supply of affordable housing based on the likely number that will become available from the existing social housing stock.
 - Estimate of the overall need: subtracting the supply from the gross need and then converted into annual flows.
- 3.63. The SHMA states that there is a need for 368 rented affordable homes per annum, in the plan area in the 2023 to 2040 period (paragraph 3.31 and table 3.11). This is an increased need of 191 homes per annum from the February 2020 SHMA (see Appendix 20) which noted a need of 220 rented affordable homes per annum (paragraph 5.50).
- 3.64. In relation to affordable home ownership, the SHMA established an estimate of the number of households living in the private rented sector (PRS) and assess the number of newly formed households which rent but which are looking to buy and may be impacted by barriers such as income, lack of deposit or difficulties obtaining a mortgage. The SHMA therefore concludes that there is a need for around 169 affordable home ownership dwellings per annum, in the plan area in the 2023 to 2040 period (see paragraph 3.59 and table 3.17). This is an increased need of forty-six homes per annum from the February 2020 SHMA which noted a need of 123 affordable home ownership dwellings per annum (paragraph 5.79).

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- 3.65. Based on the above, the SHMA has an overall requirement for 537 new affordable dwellings per annum for the period of 2023 – 2040. For 2020 – 2022 it is assumed that WCC consider the February 2020 SHMA need of 343 dwellings per annum should be used. This results in a need of 9,815 new affordable homes across the plan period (2020 – 2040) $((343 \times 2) 686 + (537 \times 17) 9,129)$.
- 3.66. It should be noted that this specifically relates 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.
- 3.67. As set out in **Section 2**, Policy H6 seeks affordable housing from development sites of ten dwellings or more (or sites of over 0.5ha), requiring at least 40% provision on greenfield sites and 30% provision on previously developed land in recognition of the increased development costs. In the short term however, where development is required to mitigate the impact of additional phosphates on the River Itchen Special Area of Conservation (SAC), the proportion of affordable housing will be reduced to no less than 35% on greenfield sites and 25% on previously developed land subject to viability.
- 3.68. The R19 LP states a standard methodology requirement of 13,565 dwellings, with a provision towards unmet need of 1,900 dwellings, creating an overall requirement of 15,465 dwellings.
- 3.69. To meet the affordable home requirement of 9,815 new affordable homes, affordable homes alone would make up 63.4% of the Local Plan housing requirement, including the 1,900 dwellings to be provided towards unmet need. This clearly does not align with the provision set out in Policy H6 which requires a maximum 40% provision on greenfield sites (reduced to 35% in the short term for those required to provide phosphate mitigation) and a maximum 30% provision on brownfield sites (reduced to 25% in the short term for those required to provide phosphate mitigation).
- 3.70. This matter is exacerbated by the supply for the R19 LP which is heavily reliant on existing commitments. Table H2 within the R19 LP states that 10,695 dwellings will be delivered through completions since the start of the Local Plan period (2020-2023), outstanding planning permissions, and other commitments such as previous Local Plan allocations.
- 3.71. This accounts 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 the R19PL). To provide the required affordable housing for this period $((343 \times 2) 686 + (537 \times 10) 5,374 = 6,060)$ the existing sites would need to be delivering an average of 68.6% affordable housing. Bloor are aware that this is not the case, as affordable dwellings delivery over the last three Annual Monitoring Report Periods has averaged 40%.
- 3.72. Therefore, overall, across the plan period, the quantum of affordable housing required to meet the demand in the district for both affordable rent and affordable home ownership will not be met by the current housing requirement and draft spatial development policies.

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- 3.73. WCC's own 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 the draft NPPF standard methodology requirement of 1,099 dwellings per year or 20,333 dwellings across the current plan period of which 9,129 dwellings would (in a best case scenario) equate to 44.89%. WCC has the ability to provide their new standard methodology plan requirement as the R19 LP states that more than 90% of the sites promoted to the Local Plan are not required demonstrating a significant land surplus in the district (see paragraph 1.2 bullet point 4).
- 3.74. As advised above unless WCC either planning in line with: (a) their draft standard methodology requirement of 1,099 dpa or (b) their average past completion rate of 996 dpa, WCC cannot simply rely upon the current standard methodology factoring in affordability as this is clearly not sufficient to meet the needs of the local population. As acknowledged by WCC in the R19 LP the best way to ensure affordable housing delivery is to allocate large development sites (paragraph 9.40), as evidenced in the 2022-2023 Annual Monitoring Report ('AMR') Appendix 1 which demonstrates that 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) Bloor consider that Manor Parks would help address this need. Bloor therefore **object** to Strategic Policies SP2 (spatial strategy and development principles), H1 (housing provision) and H2 (housing phasing and supply) and Policy H6 (affordable housing) as drafted on the basis that they cannot be deemed sound as they not positively prepared or effective and will not be consistent with national policy by the time of Examination.

Unmet Need

- 3.75. WCC is part of the Partnership for South Hampshire (PfSH), 37% of the district is located within the defined area. The R19 LP refers to the fact that there are a number of authorities within southern Hampshire that appear unable to meet their standard method housing need in full and cites the PfSH Spatial Position Statement which seeks to address this (paragraph 9.15). Paragraph 9.20 confirms that an unmet needs allowance of 1,900 dwellings is provided as a contribution towards the unmet needs of neighbouring areas in South Hampshire. While Bloor welcome WCC's decision to meet some of the unmet housing needs arising in PfSH, Bloor are concerned for the reasons set out below that WCC do not go far enough given the scale of the shortfalls that have been highlighted to the council.
- 3.76. The PfSH Spatial Position Statement (December 2023) identified a shortfall across the area of 11,771 dwellings (see table 2 below). The 1,900 dwellings provided by WCC in their R19 LP is noted to be to address the short to medium term need "*in the spirit of cooperation*" (paragraph 9.16).

Table 2: PfSH Housing Need and Supply 2023-36 [Source: PfSH Spatial Position Statement 2023]

Local Authority	Standard Method (2023) Apportioned to PfSH (dpa)	Total Housing Need 2023-2036	Identified Supply 2023-2036	Shortfall / Surplus (dpa)
East Hampshire	113	1,469	1,274	(-) 194
Eastleigh	667	8,671	6,160	(-) 2,511

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Fareham	541	7,033	9,356	900
Gosport	353	4,589	2,518	(-) 2,071
Havant	516	6,708	4,105	(-) 2,603
New Forest	1,056	13,278	8,076	(-) 5,652
Portsmouth	899	11,687	11,304	(-) 383
Southampton	1,475	19,175	15,951	0*
Test Valley (part – 43% of district)	182	2,366	3,109	743
Winchester (part – 37% of district)	235	3,055	3,055	0
Total	6,037	78,481	64,909	(-) 11,771

* Shortfall due to urban uplift – no requirement to accommodate elsewhere

- 3.77. Noting the above, the published Statements of Common Ground with PfSH member authorities indicate that unmet need in the sub region is likely much greater than suggested. For example, Portsmouth City Council, have confirmed an unmet need of 219 dwellings per annum, which could equate to 2,847 dwellings over the period of 2023-2036 assessed in the PfSH Spatial Position Statement, this is starkly different to the shortfall of 383 noted. Havant Council have also confirmed they cannot meet their standard method need, however have not quantified their anticipated shortfall. The Housing Topic Paper (2024) sets out that only Test Valley, East Hampshire, Eastleigh, and Fareham are noted to be able to meet and potentially exceed their standard method-based housing need – with a total over provision of approximately 3,000 dwellings. When including WCC’s unmet need allowance a shortfall of approximately 9,000 dwellings.
- 3.78. Bloor recognise that in the longer term, the Spatial Position Statement identifies several ‘Broad Areas of Search for Growth’, where future local plans will assess the contribution they can make to this ongoing unmet housing need in the sub region. Bloor do not consider this to be appropriate as it is not meeting the current need within the next cycle of Local Plans, despite the need being for the period up to 2036 and these plans running until c. 2040. It is therefore putting off taking the tough choices which DPM SoS Angela Rayner has told Councils they will need to take.
- 3.79. Therefore, it is not considered that WCC are adopting the “*spirit of collaboration*” as they suggest but are in fact relying on out-dated and flawed evidence base, raising questions of soundness.
- 3.80. Furthermore, while Bloor understand that as drafted the Duty to Cooperate comprises the legal requirement to provide a verifiable audit trail indicating an attempt to cooperate with neighbouring authorities (attempt to as opposed to succeed in). Despite the publication of Numerous SoCG’s with PfSH authorities, it would appear that limited discussion has taken place between WCC and council’s anticipated to have shortfalls, with the Havant SoGC noting that:

“Havant Borough Council notes that there has been no engagement between the Regulation 18 and Regulation 19 stages from Winchester City Council in order to address the matters raised in earlier representations or the letter of 5th March 2024. Havant Borough Council is mindful that the NPPF indicates

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that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for.” [our emphasis added].

- 3.81. As expressed from the HBF in their representations to WCC that this statement would suggest that the Council's approach to the duty to cooperate has been neither on going nor constructive as is required by the Planning and Compulsory Purchase Act (as amended by the Localism Act 2011) and that the Council has not met the requirements of the duty to co-operate. It would appear that the Council have not grappled with the actual scale of the unmet needs in Havant, and indeed elsewhere in the PfSH, and have instead moved forward with their proposed spatial strategy using the buffer as a means to address some of the unmet needs in the sub region but not revisiting their strategy to see if they could do more. In order to address these failings, the Council will need to engage properly and meaningfully with the neighbouring authorities who cannot meet their needs and reassess how many homes they are able to deliver in Winchester to meet as many of those needs as possible. These additional discussions will need to take place prior to the submission of the local plan given that failing of co-operation cannot be rectified prior to submission.
- 3.82. As set out by the HBF within their representations to WCC, the lack of direct consideration of the unmet housing needs in other areas can also be seen in the Integrated Impact Assessment ('IAA') and the reasonable alternatives considered. The decision not to consider unmet needs of other areas at the start of the plan making process is noted in paragraph 2.33 of the IAA which states that *“At the time of preparing the Strategic Issues and Priorities document and Regulation 18 Local Plan, the options considered related to meeting the needs of Winchester District, not the unmet needs of neighbouring authorities.”* While the Council then went on to consider options that were higher than what was needed it is not clear that these were in a direct response to the unmet needs in other areas or just an outcome of the spatial strategies being proposed and that they in turn resulted in a “buffer” between needs and supply. What has not been tested in the IAA was an alternative that considered a greater response that to the significant unmet needs elsewhere. Such a spatial strategy would have been a reasonable approach to consider and points to the Council not actively seeking to consider and address the needs of other areas through this plan.
- 3.83. Furthermore, this requirement to ‘attempt’ is changing under the draft NPPF, to a requirement to succeed at cooperating. This point was made by WCC's legal advisor Andrew Fraser-Urquhart KC of Kings Chambers at their urgent Cabinet Meeting in August 2024.
- 3.84. Paragraph 24 of the draft NPPF sets out that effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered and key spatial issues, including meeting housing needs, delivering strategic infrastructure, and building economic and climate resilience, are addressed.
- 3.85. Paragraph 27 of the draft NPPF adds that once the matters which require collaboration have been identified, strategic policy-making authorities should make sure that their plan policies are consistent with those of other bodies where a strategic relationship exists on these matters, and with the relevant investment plans of infrastructure providers, unless there is a clear justification to the contrary. In particular plans should ensure that:

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“b) unmet development needs from neighbouring areas are accommodated in accordance with paragraph 11b; and”

3.86. Paragraph 11b of the draft NPPF notes that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

“The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.

3.87. Paragraph 28 of the draft NPPF concludes by noting that plans come forward at different times, and there may be a degree of uncertainty about the future direction of relevant development plans or plans of infrastructure providers. As such, LPAs will be required to make an educated estimate regarding neighbour’s unmet needs.

3.88. Considering the above, Intelligent Land have calculated the estimated shortfall within PfSH if the draft NPPF is adopted. As shown in table 3 below, there would be a total housing need of 94,931 dwellings between 2024 and 2036 in the PfSH area and an identified supply of 59,916 dwellings for this same period. Therefore, a shortfall of 35,015 dwellings for the period of 2024 to 2036 or 3,302 dwellings per annum would exist, with not a single member authority being noted to be in surplus and the New Forest (- 10,125 dwellings), Havant (- 6,699 dwellings) and Eastleigh (- 5,141 dwellings) having the greatest shortfalls.

Table 3: PfSH Housing Need and Supply 2024-36

Local Authority	Standard Method (2023) Apportioned to PfSH (dpa)	Total Housing Need 2024-2036	Identified Supply 2024-2026	Shortfall / Surplus (dpa)
East Hampshire	215	2,580	1,177	(-) 1,403
Eastleigh	902	10,827	5,686	(-) 5,141
Fareham	794	9,527	8,636	(-) 891
Gosport	464	5,575	2,324	(-) 3,250
Havant	874	10,488	3,789	(-) 6,699
New Forest	1,465	17,580	7,455	(-) 10,125
Portsmouth	1,098	13,181	10,434	(-) 2,746
Southampton	1,295	15,538	14,724	(-) 814
Test Valley (part)	396	4,752	2,870	(-) 1,882
Winchester (part)	407	4,884	2,820	(-) 2,064
Total	7,911	94,931	59,916	(-) 35,015

3.89. While Bloor recognise the transitional arrangements set out in Annex 1 and the draft status of the NPPF, as with ignoring the requirements to plan for increased growth of c. 7,000 more dwellings in their own district, grossly underestimating an unmet need of over 35,000 for the period up to 2036 (which is 4 years less than the current plan period), in a sub regional body, of which it is an active member, in the height of

the housing and affordability crisis by rushing the R19 LP under urgent procedures is fundamentally unjustified. Furthermore, this goes against the messaging from Labour MP's to both Councils and the Planning Inspectorate which has encouraged tough decisions to be made and simply pushes the problem down the line.

- 3.90. Bloor therefore considers that WCC should be taking a much greater proportion of the identified unmet need and accommodating it within the area of the district located in PfSH, more general district need should then be accommodated within the rest (63%) of the district. This is expanded upon in **Section 4**. WCC has the ability to provide a much greater proportion of the identified unmet need, as the Local Plan states that more than 90% of the sites promoted to the Local Plan are not required demonstrating a significant land surplus in the district (see paragraph 1.2 bullet point 4). Bloor therefore **object** to Strategic Policies H1 (housing provision) and H2 (housing phasing and supply) as drafted on the basis that it cannot be deemed sound, as they are not positively prepared and will not be consistent with national policy by the time the Local Plan it is at Examination

Conclusion

- 3.91. As set out above, the plan period should be amended to (1 April) 2024 to (31 March) 2041 (17 year plan period) to ensure it is forward looking, as is the intention of the standard method as confirmed by paragraph 2a-005 of the PPG, and has a year buffer to ensure a 15-year period from adoption as required under paragraph 22 of the NPPF. Using the current standard method this would generate a housing need of 11,492, which alongside the unmet need allowance of 1,900, less the 350 dwellings to be provided within the South Downs National Park, would result in a total district housing requirement of 13,042 dwellings. When considering this against the identified housing provision (minus completions in years removed from the plan period) of 12,295 dwellings as set out in Table H1, WCC would have a shortfall of 748 dwellings
- 3.92. Bloor consider that ideally WCC should be planning for their new draft standard method requirement of 1,099 dwelling per annum or 20,333 dwellings across the current plan period (1 April) 2020 to (31 March) 2040 or 18,683 dwellings across the plan period above (1 April) 2024 to (31 March) 2041 proposed by Bloor as best practice (option (a) within these representations). These numbers are noted to be before the unmet need allowance is added. Once the unmet need amount is incorporated, WCC would have a shortfall of 6,418 dwellings and 7,938 dwellings respectively for the two plan periods.
- 3.93. If WCC alongside, the 15 other authorities at R19 stage ignore the new standard method, they would deliver c. 33,500 homes per year less than they will be required too under the draft NPPF, worsening the housing crisis. This point is particularly fundamental in WCC where affordability is one of the worst in England.
- 3.94. If WCC choose not to plan for their new draft standard method requirement, which Bloor fundamentally disagrees with and considers to be totally at odds with the Government growth agenda due to the acute housing crisis highlighted above, it is considered that they should be planning positively as a minimum in line with the NPPF. Bloor note that currently WCC are planning negatively in comparison to their historic delivery rates, which contradicts the vision of the government who in the NPPF consultation set out "Given

the chronic need for housing we see in all areas, we should celebrate strong delivery records without diluting future ambitions”.

- 3.95. In order to plan positively, WCC should be planning for at least 996 homes per year, or 18,685 dwellings across the current plan period (1 April) 2020 to (31 March) 2040 or 16,932 dwellings across the plan period above (1 April) 2024 to (31 March) 2041 proposed by Bloor as best practice, in line with their average delivery from 2020 to 2023 (option (b) within these representations). These numbers are noted to be before the unmet need allowance is added. Once the unmet need amount is incorporated, WCC would have a shortfall of 4,770 dwellings and 6,188 dwellings respectively for the two plan periods. WCC therefore need to include an increased number of allocations within their Local Plan.
- 3.96. Finally, Bloor note that WCC should be taking on a greater proportion of the PfSH unmet need – under both the current need requirements which as planned for would result in a c. 9,000 dwelling shortfall until the next plan period and under the new shortfall of over 35,000 once the draft standard method is published. The reason for the lack of adequate provision to PfSH is clear within the SoGC from Havant Borough Council which notes that there has been no engagement between the Regulation 18 and Regulation 19 stages from WCC. This is deemed unacceptable and raises issues regarding the legal compliance and soundness of the plan.
- 3.97. Bloor considers that without adopting either of the above approaches (i) plan for the new draft standard method or (ii) plan in line with historic delivery, and for the plan to accommodate a greater proportion of the PfSH unmet need, WCC cannot be considered to be planning positively for growth and will not deliver the much needed affordable housing or tackle the acute affordability crisis. WCC themselves have highlighted their ability to plan for this greater need within their R19 LP which at paragraph 1.2 bullet point four of the Foreword notes *“Over 90% of the sites that developers put forward have not been included in this plan”.*

4. Why Winchester

- 4.1. As set out in **Section 2**, Bloor supports the overall vision set out at page 19 of the R19 LP, however, expresses concerns as to how the vision can be achieved through the current proposed spatial distribution strategy. The Local Plan's development strategy identifies three 'spatial areas' within Winchester District (Strategic Policy SP2). Strategic Policy SP2 sets out an indicative requirement of 5,640 dwellings in Winchester Town (37.2%), 5,650 dwellings in South Hampshire Urban Areas (SHUAs) (37.3%) and 3,850 in the Market Towns and Rural Area (MTRAs) (25.5%). As per **Section 3**, Bloor considers that the overall housing requirement should be increased in order for the plan to be deemed sound and that the distribution of this housing requirement should be revised to ensure consistency with the evidence base. Justification for the later part of this statement is provided throughout this section.
- 4.2. Paragraph 9.6 of the R19 LP sets out that "*The Local Plan sets out a development strategy based on a sustainable settlement hierarchy (informed by the Settlement Hierarchy Review). Sites have been selected for allocation based on whether they would help deliver the Local Plan strategy, an assessment of their benefits and impacts (including Sustainability Appraisal and viability assessment) and whether they can provide the types of housing needed in various locations*". Bloor raises no objection to a spatial strategy that delivers a balanced approach to housing that meets the needs of the Authority as a whole, however has concerns regarding the conflicts of Strategic Policy SP2 with the wider R19 LP objectives and policies and how the spatial strategy has been developed.
- 4.3. The R19 LP's spatial strategy insufficiently prioritises Winchester Town as the most sustainable location for growth. The proposed distribution of development commits disproportionate growth to areas with limited active travel and public transport infrastructure. This will result in an over-reliance on private car use that will inevitably lead to increased congestion, emissions, and community severance, negatively impacting resident health and well-being. This approach contradicts the Plan's own IIA criteria and conflicts with both current and emerging national planning policy, raising significant questions about the Local Plan's soundness. This is explained below.
- 4.4. Paragraph 2.1 of the Development Strategy and Site Selection (July 2024) document states that the growth strategy for the District was informed by a 'settlement hierarchy' approach which ranked and classified settlements based on the availability and accessibility of a broad range of facilities and services, a settlement's economic role and the environmental constraints to development. The spatial strategy resulted in the following spatial areas: -
- Winchester Town Area (WTA);
 - South Hampshire Urban Areas (SHUA); and
 - Market Towns and Rural Area (MTRA).
- 4.5. Paragraph 4.4 of the Transport Assessment (August 2024) recognises that "*there are disparities in transport provision across the district*" and this mirrors similar recognition set out in the 'Transport Assessment Stage 1 Report' (September 2020). In this respect, the evidence has been consistent over time.

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- 4.6. Such differences are understood within paragraph 4.14 of the Transport Assessment (August 2024), which recognises that, within the South Hampshire Urban Areas, *“proximity to the strategic road network, combined with lower levels of amenities and employment opportunities with each urban area, encourages commuting trips to other towns being made by car, compounded by available public transport options being infrequent and limited in terms of accessible destinations and journey time”*.
- 4.7. The transport baseline summary provided on numbered page 38 of the report states *“most existing housing developments within the SHUAs provide footpaths which are attractive enough for most people to consider short trips by foot, however the distance to destination reduces the attractiveness of trips being made by this mode. Public transport options currently consist of limited and infrequent bus services between settlements...combined with lower levels of service for public transport and active travel modes means that the existing population is likely to have a relatively high dependency on private car travel...”*
- 4.8. The geography of part of the Market Towns and Rural Areas results in a broadly similar position as the SHUA and the transport baseline summary provided on numbered page 38 of the WCC R19 LP Transport Assessment report (2024) recognises that, *“based on the current situation, the relatively high distance from the settlements within this spatial area to the strategic road network may mean that increased development could result in higher congestion on the local road network as well as other transport related impacts such as vehicle collisions and reduced air quality”*.
- 4.9. Conversely, the transport baseline summary on numbered page 37 recognises that *“the Winchester Town Area has the highest levels of transport accessibility across the District, with services and supporting infrastructure for public transport, walking and cycling in the district.”* Furthermore, paragraph 4.61 recognises that *“Winchester Town Area is relatively small, compact and is visually attractive, meaning it is potentially conducive for most people choosing to walk for part, if not all of many regular journeys. In fact, most of the people who live and work in the city currently walk or cycle to work (60%).”*
- 4.10. This statistic mirrors those presented within Calibro’s Transport Feasibility report (**Appendix 4**) which identified that the equivalent Winchester Town Area comprises of more than 40% of the available jobs in the District – 11 times greater than the next largest area of employment. This is four times the size of the next largest cluster of job opportunities.
- 4.11. In this sense, Winchester Town Area will always remain the largest attractor of commuting trips in the District and this is recognised within the WTA transport baseline summary provided on numbered page 37 of the Transport Assessment (August 2024) report, which states that *“travel demand in highway peaks is primarily caused by the significant in and out-commuting patterns to/from the centre of Winchester and reflects the City’s role as a regional employment centre”*. Consequently, delivering significant growth in other areas will inevitably result in the need to commute to the city over longer distance to access those opportunities.
- 4.12. However, on the Council’s own evidence, such locations are poorly served by public transport and active travel connections, such that those longer distance journeys will inevitably need to be made by car –

compounding existing congestion, delay, air quality and variance in public transport journey times within WTA.

- 4.13. This is in contrast to growth occurring within the WTA which would have access to more than 50% of the District's jobs within compact urban area which reduces travel distances, ensuring that over 60% of existing trips are already undertaken by non-car modes. In this way, there is a proven ability for trips to be undertaken without reliance on private car travel, in combination with an ingrained propensity for the existing population to actively travel by more sustainable modes. It is also true that such behaviour can more easily be influenced through vision-led strategies and travel planning interventions.
- 4.14. In addition to the above, the spatial strategy fails to demonstrate adequate integration with existing public transport networks and lacks a clear framework for aligning future development with public transport provision. Indeed, the proposed allocations outside of the WTA are on low frequency bus routes with significant journey times into the WTA, where over half of all journeys would to travel to access employment. This creates the conditions for car dominance that would result in more trips on the local and strategic road networks, compounding congestion and air quality issues. Further information on this point can be found a **Appendix 3**.
- 4.15. Despite the fact that such explicit recognition that WTA is the most sustainable location for growth, has been provide throughout the various iterations of the evidence base, the R19 LP at Strategic Policy SP2, as above sets out an indicative requirement of 5,640 dwellings in Winchester Town (37.2%), 5,650 dwellings in South Hampshire Urban Areas (SHUAs) (37.3%) and 3,850 in the Market Towns and Rural Area (MTRAs) (25.5%).
- 4.16. The spatial strategy therefore proposes deliver some 63.7% of growth outside of the Winchester Town Area and therefore, as recognised in the Council's own evidence, in the least sustainable locations in the District. This is entirely misaligned with national policy and conflicts with the Plan policies and objectives.
- 4.17. The only reasonable conclusion to draw is that political motivation has had an unbalanced influence on the outcome of the Plan. This political interference has sought to detract from the consistent and explicit recognition of the significant locational advantages that exist in the Winchester Town Area, in contrast to physical and service barriers within the SHUA and MTRA.
- 4.18. The approach to the plan-making has not only distorted the strategy which now not only conflicts with the R19 LP's stated objectives but also with its emerging policies and with national policy. In its current state, the Local Plan is obviously unsound and further evidence and evaluation is required to underpin the current strategy – or to inform of a revised strategy.
- 4.19. Bloor do not consider that all new development should be located within the Winchester Town area, as there are some sustainable locations within the SHUA and MTRA, however the focus and distribution of development should be greater in and around Winchester Town. Without this amend, it is not considered that the Local Plan can be deemed sound.

5. Why Manor Parks

5.1. The R19 LP at paragraph 9.6 sets out that sites have been selected for allocation based on whether they would help deliver the Local Plan strategy, an assessment of their benefits and impacts (including Sustainability Appraisal and viability assessment) and whether they can provide the types of housing needed in various locations. Bloor consider that the site Manor Parks presents an excellent opportunity to help deliver the Local Plan strategy and, as such, should be utilised to provide this further housing need in Winchester Town as evidenced at **Section 3**. The R19 LP features seven key priorities which is uses to frame the draft policies, it is against these that we assess the site. As such, this section initially sets out an overview of the site and then references why Manor Parks is suitable by referring to both published Local Plan evidence and technical evidence produced on behalf of Bloor.

Overview of the Site

- 5.2. The site comprises 69.89 hectares ('ha') (172.7 acres) of land located at South Winchester Golf Course, circa 1.6 kilometres south-west of Winchester Town centre. The site is located adjacent (to the east) of Oliver's Battery, a post-war suburb of Winchester. Millers Lane forms the south-western boundary of the site, while the A3090 ('Romsey Road') forms the north-western boundary, which is one of the main thoroughfares into the centre of Winchester. The wider landscape to the north and west comprises agricultural land.
- 5.3. The majority of the site is comprised of a golf course (constructed in the early 1990's) with semi-natural and amenity grassland and associated buildings, namely the modern club house. An area of holiday lodges is also present on the site. Whilst Bloor owns the freehold of the lodges, this area is subject to a separate lease and therefore does not form part of the promotion.
- 5.4. The site occupies an area of undulating land that incorporates a small valley running through its centre in a north-west to south-east direction. The two highest points of the site are at the western end of the A3090 and at the northern end of the site adjacent to Oliver's Battery, both areas lying at approximately 117m Above Ordnance Datum (AOD). Visually, the site is well contained as a result of wider local topography and the valley described above. There are some additional enclosures through pockets of woodland within the site and mature planting on the northern and western boundaries.
- 5.5. The SHLAA identified Manor Parks as available and deliverable with an estimated capacity of approximately 1,000 dwellings which could be delivered in 10-15 years. The SHLAA ranked the site as green for all but its location in the countryside and proximity to heritage assets, for which the site received an amber ranking. These rankings were further explored within the IIA which is set out below.
- 5.6. The IIA ranked South Winchester Golf Course as minor positive for climate change mitigation, travel and air quality, health and wellbeing, and services and facilities, negligible/negligible uncertain for economy, landscape, water resources and flood risk, minor negative uncertain for the historic environment and significant negative for biodiversity and geodiversity and natural resources.

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5.7. From analysis of all major allocated site rankings, Barton Farm is the only site which scores better than South Winchester Golf Course (or Manor Parks) as it receives a neutral for heritage. All further 'major' sites either score the same, including Land at Vale Farm and the Station Approach Regeneration Area, or worse, including Sir John Moore Barracks which receives no positives, negligible/negligible uncertain for health and wellbeing, economy, landscape, historic environment, resources and flood risk, minor negative uncertain for climate change mitigation, travel and air quality and services and facilities and significant negative for biodiversity and geodiversity and natural resources (see Table 4).

Table 4: Integrated Impact Assessment (IIA) Rankings of South Winchester Golf Course (Manor Parks) and Sir John Moore Barracks

IIA Criteria	Manor Parks	Sir John Moore Barracks
IIA 1: To minimise the district's contribution to climate change through a reduction of greenhouse gas emissions from all sources and facilitate the aim of carbon neutrality by 2030	Positive	Negative
IIA 2: To reduce the need to travel by private vehicle in the district and improve air quality	Positive	Negative
IIA 4: To improve public health and wellbeing and reduce health inequalities in the district	Positive	Neutral
IIA 7: To ensure essential services and facilities and jobs in the district are accessible	Positive	Negative
IIA 8: To support the sustainable growth of the district's economy	Neutral?	Neutral?
IIA 9: To support the district's biodiversity and geodiversity	Double Negative	Double Negative
IIA10: To conserve and enhance the character and distinctiveness of the district's landscapes	Neutral?	Neutral?
IIA 11: To conserve and enhance the district's historic environment including its setting	Negative	Neutral?
IIA 12: To support the efficient use of the district's resources, including land and minerals	Double Negative	Double Negative
IIA 13: To protect the quality and quantity of the district's water resource	Neutral	Neutral
IIA 14: To manage and reduce flood risk from all sources	Neutral	Neutral

5.8. Based on the above, Bloor considers that it is clear that Manor Parks provides a logical site for allocation based on the selection method set out at paragraph 9.6 of the R19 LP. Further, we demonstrate in the below sections how we can improve the ranking of Manor Parks through mitigation measures which further demonstrates its suitability.

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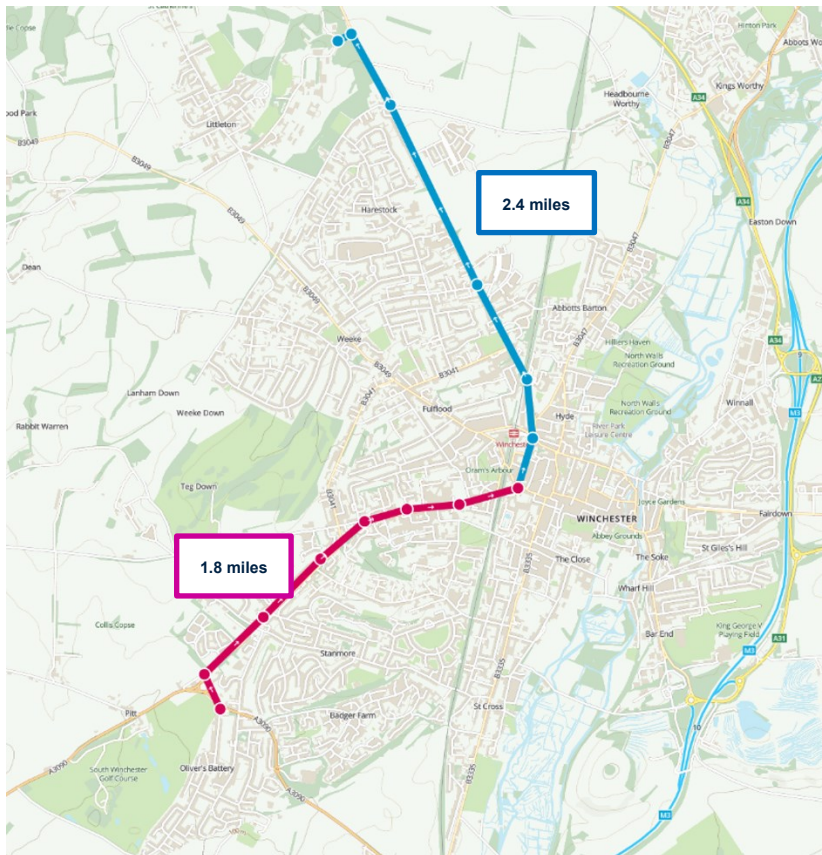
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Contribution to Winchesters Housing Need

5.9. Primary analysis of housing need is set out in **Section 3**, in which we conclude that the R19 LP should be providing for a higher housing need up to 2041, and as per **Section 4** a greater percentage of this should be located in Winchester Town due to the underlying evidence base. Bloor considers that Manor Parks is the optimal location to allocate further housing due to its proximity to and functional relationship with Winchester Town. It is considered that counting the numbers delivered at Manor Parks within the Winchester Town provision, would be acceptable, as this approach has been adopted for Sir John Moore Barracks which is located further from the town centre than the Manor Parks site (see Figure 9). The above stance was discussed at the R19 LP Scrutiny meeting on Thursday 29 September 2022, in which Cllr Horrill questioned the reasoning for including of the Barracks within Winchester Town rather than Littleton Parish to which WCC’s Strategic Planning Manager Adrian Fox confirmed it is not due to the physical location in Winchester Town, however due to its proximity to the city (such as Barton Farm) and the fact that they anticipate future residents to call on the city centre facilities³.

Figure 9: Context Plan Manor Parks and Sir John Moore Barracks Proximity to Winchester city centre [Map Source: Ordnance Survey, Route / Time Source: Google Maps]



³ Scrutiny debate of draft policy SP2 Spatial Strategy and Development Principles.

- 5.10. Paragraph 9.7 of the R19 LP emphasises the importance of the location of housing: “*Additional housing in the right location can improve the sustainability of communities, including the regeneration of brownfield land, enhancing the viability of services such as shops and improving community cohesion through providing a range of housing to meet various needs*”.
- 5.11. Bloor supports WCC’s approach to prioritising the redevelopment of brownfield land as set out in Policy D6, however notes that, as per the Key Issues criteria viii. on page 134, there is a finite resource of brownfield land to reach the Government housing requirement.
- 5.12. Further, as set out in **Section 3**, there are risks of restricting greenfield until 2030, as Policy H6 seeks affordable housing from development sites of 10 dwellings or more (or sites of over 0.5ha), requiring at least 40% provision on greenfield sites and 30% provision on previously developed land in recognition of the increased development costs. In the short term however, where development is required to mitigate the impact of additional phosphates on the River Itchen Special Area of Conservation (SAC), the proportion of affordable housing will be reduced to no less than 35% on greenfield sites and 25% on previously developed land subject to viability. The constraints of delivering affordable housing on brownfield sites is evidenced at paragraph 9.40 of the R19 LP which sets out that the single largest source of supply for new affordable dwellings will be the proportion secured as part of larger market-led housing schemes.
- 5.13. Based on the above, Bloor considers that WCC is required to release the most appropriate greenfield sites before 2030 to meet the Local Plan objectives and the needs of their residents. It is considered that Manor Parks is the optimal site to do this.
- 5.14. Delivery of housing is not a IIA Criteria and, as such, this section does not provide a re-ranking as per mitigation as is done under other headings within this section.

Contribution to Carbon Neutrality and Sustainable Travel

- 5.15. As set out in **Section 2**, carbon neutrality is at the heart of the R19 LP, evidenced by Strategic Policy CN1 which sets out that WCC will seek to minimise carbon emissions and ensure climate change and adaptation issues are embedded in the Local Plan.
- 5.16. As set out in **Section 4**, the principle of focusing development in Winchester Town offers the ability for reduced carbon dioxide emissions through reducing journeys by private car by locating homes in the location of the majority of jobs resulting in higher levels of containment. Further, as acknowledged in the IIA at objective one, it is acknowledged that delivering new dwellings at larger scale development sites offer the greatest potential to link homes to new low carbon energy schemes such as district heating and combined heat and power (‘CHP’) (paragraph 4.17).
- 5.17. Understanding the above, Bloor commissioned Calibro and Savills Earth to undertake sustainability analysis and carbon modelling from both vehicle emissions and regulated and unregulated building emissions.

- 5.18. As per **Appendix 4**, Calibro have developed a Variable Demand Model ('VDM') to enable comparison of the annualised CO2 emissions generated from respective locations within the district. The calibrated and validated VDM model was used to established annualised CO2 emissions for each of the SHEELA sites within the district, assuming that each site had capacity to deliver 1,000 dwellings. The results as presented in **Appendix 4** are clear, Manor Parks and Sir John Moore Barracks are the two stand-out locations where development can contribute to the climate emergency and minimise emissions. The difference between Manor Parks and the next best location (Lanham Lane) equates to a carbon saving of 893 tonnes achieved from 387,000 fewer vehicle kilometres and 25,500 fewer car trips each year. These results are unsurprising given the information provided in **Section 4**. Bloor considers that this evidences that Manor Parks is not only a suitable location for development but is considered should be an essential component of any Local Plan.
- 5.19. Technical Evidence produced by Savills Earth provided at **Section 3**, qualifies this conclusion and demonstrates that the proposed strategy will deliver largely in line with the LETI Standards at a viable level.
- 5.20. As set out within **Appendix 4**, the site's location to the existing non-car travel networks and the type of amenities that would be accessible within a reasonable journey of the site. In this regard, the evidence concludes that the site would provide residents of a future residential development of the site with an opportunity to access an array of local amenities, including jobs, jobs and services, by a range of non-car travel modes. On this basis, the site accords with the thrust of sustainability that runs through the whole of the Framework.
- 5.21. In addition, the design development work will quantify the extent to which the proposed sustainable transport interventions will reduce transport related emissions. Details of the proposed sustainable transport measures to be included within the site are as follows:
- Provision of electric vehicle charging points for all homes, plus use of PV charging in public areas.
 - Provision of circa 5,000m of dedicated cycle routes and circa 2,000m of dedicated recreational footpaths.
 - Delivery of a multi-modal facility including car club, e-cycle hire and circa 200-space Park and Ride.
 - Delivery strategy to minimise commercial vehicle journeys.
 - Provision of a community home working hub.
 - Delivery of the 20-minute neighbourhood principles will ensure access to facilities and services within walking and cycling distance and.
 - Provision of sustainable transport will be provided with a high frequency (every 4 minute) bus service into the city centre, a level of service unparalleled in the rest of the district.
- 5.22. The latter of the above points, and as such the unique opportunity presented at Manor Parks, is evidenced by Stagecoach's support of the development which is clear from the agreed Statement of Common Ground submitted alongside this representation. Stagecoach set out that the combination of bus priority measures that will improve the length and reliability of existing bus services on a part of the network where this is an acknowledged issue, and deliver much needed new Park and Ride capacity (circa 200 spaces) that will help to reduce city-bound traffic and improve air quality *"is a kind of helpful combination we rarely see"*.

5.23. Based on the benefits and mitigation suggested by Bloor’s technical consultant team it is considered that the IIA rankings for objectives 1 and 2 (those directly relevant to this subsection) should both be updated to significant positive as demonstrated in the table below.

Table 5: Provided IIA Rankings of criteria 1 and 2, of South Winchester Golf Course (Manor Parks) and Updated Ranking to reflect Proposed Mitigation

IIA Criteria	Manor Parks IIA Report Ranking	Manor Parks IIA Ranking with Proposed Mitigation
IIA 1: To minimise the district’s contribution to climate change through a reduction of greenhouse gas emissions from all sources and facilitate the aim of carbon neutrality by 2030	Positive	Significant Positive
IIA 2: To reduce the need to travel by private vehicle in the district and improve air quality	Positive	Significant Positive

Natural Environment

5.24. Strategic Policy NE1 seeks to protect and enhance the biodiversity and the natural environment in the district, while Policy NE4 seeks to retain and enhance green and blue infrastructure and Policy NE5 requires a development to provide a minimum of a 10% measurable net gain in biodiversity.

5.25. Manor Parks is free from any statutory designations that relate to ecology and there are none within 1km. The site is not covered by any non-statutory designations, there are however two non-statutory designations within 0.5km of the site. These are Pitt Manor SINC located 0.4km north and Yew Hill SINC located 0.4km south, neither of which are ecologically linked to the site and are separated from the site by existing roads and do not have public access. As such, it is not considered that there would be any significant impacts upon either of them.

5.26. The site contains records of protected and notable species, this is not uncommon for a site of this size. The site is an active golf course with extensive artificial maintenance a high footfall. Any area that has high numbers of the public visiting often has more species records as there are more people to spot and report the wildlife found. Other areas often have an under recording of wildlife due to the accessibility to the public and an absence of records does not mean an absence of the species. The habitat proposals will increase the biodiversity offerings of the site and will continue to support the protected and notable species that have been previously recorded within the site.

5.27. The site does contain deciduous woodland priority habitat. The woodland is to be retained and buffered within the proposals. Further native planting is proposed to expand the woodland and, as such, a net benefit is anticipated. Overall, the site is currently of low ecological value.

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- 5.28. Visually, the site is well contained as a result on the local topography and valley in which it is located. There is some additional enclosure through pockets of woodland within the site and mature planting on the northern and western boundaries. There is limited intervisibility between the surrounding PRow network and the site screening is afforded through topographical context, distance and intervening vegetative features and built form. The Clarendon Way which runs through the site is noteworthy, however; the development proposals would seek to enhance this where it enters and passes through the site.
- 5.29. Due to the site's existing land use, the character is typical of an intensively managed golf course with sculpted mounds, large swathes of open grassland, some deciduous woodland, and a scattering of tree planting. A line of small to medium lakes can be found at the lowest point following the alignment of the valley. The visual character is also typical of an intensively maintained recreational landscape. A review of the baseline condition of the site regarding landscape matters shows that the site is uncharacteristic of the surrounding landscape by virtue of its current land use as a golf course. Whilst there are clearly some landscape receptors of value contained within the site, these could be retained and enhanced through effective design. As such, the susceptibility of the site in regard to visual matters is also considered to be low, meaning the accommodation of residential development would have a limited effect on visual receptors beyond the site's immediate context.
- 5.30. Manor Parks creates the opportunity to create a new low carbon community for Winchester which will deliver a generous and biodiverse rich place through retention of up to 50% of the site as new green infrastructure and will deliver a 10+% biodiversity net gain. Biodiversity and green infrastructure will be a fundamental part of the identity for the development and will create a positive setting to Winchester. Spaces will be multi-functional where appropriate, providing opportunities for play, recreation, movement, drainage, food-growing, and wildlife. Thus, Bloor considers the site an optimal development location to capitalise on environmental benefits while delivering up to 1,100 new homes.
- 5.31. Regarding flooding, the site is located in Flood Zone 1 and therefore has very low risk. Bloor notes that it is generally accepted that use of infiltration techniques is more effective than attenuation at managing the volume of runoff from development of greenfield sites. Furthermore, Manor Parks could deliver the four pillars of SuDS as defined in the CIRIA SuDS Manual and, as such, would exceed draft local and national guidance.
- 5.32. Based on the benefits and mitigation suggested by Bloor's technical consultant team, it is considered that the IIA rankings for objectives 9, 10, 13 and 14 (those directly relevant to this subsection) should be updated to positive, positive, neutral, and positive as demonstrated in the table below.

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Table 6: Provided IIA Rankings of criteria 9, 10, 11 and 13, of South Winchester Golf Course (Manor Parks) and Updated Ranking to reflect Proposed Mitigation

IIA Criteria	Manor Parks IIA Report Ranking	Manor Parks IIA Ranking with Proposed Mitigation
IIA 9: To support the district's biodiversity and geodiversity	Double Negative	Positive
IIA10: To conserve and enhance the character and distinctiveness of the district's landscapes	Neutral?	Positive
IIA 13: To protect the quality and quantity of the district's water resource	Neutral	Neutral
IIA 14: To manage and reduce flood risk from all sources	Neutral	Positive

Conserving Heritage

- 5.33. Strategic Policy HE1 sets out that the unique character, significance, quality and integrity of the district's historic environment is an irreplaceable resource, which positively contributes to the district's distinctive local 'sense of place' and cultural offer which needs to be conserved, enhanced and enjoyed in accordance with the National Planning Policy Framework. As such, Policy HE2 requires all heritage assets to be conserved in a manner appropriate to their significance.
- 5.34. The Heritage Appraisal of the site shows that the site contains two 'designated heritage assets,' which are both Grade II listed buildings: Staddle barn one hundred metres east of Pitt Manor farmhouse, and Cart shed one hundred metres east south-east of Pitt Manor farmhouse. An additional four Grade II listed buildings are located between the site's north-western boundary and Romsey Road and a further seven are positioned on the opposite (north-western) side of the main road, where they represent the core of the hamlet of 'Pitt.'
- 5.35. The development at Manor Parks will conserve and enhance the setting of listed buildings both on site and adjoining by seeking to retain the clubhouse (subject to an appropriate end user being identified) and retention of the staddle stone barn with sensitively designed buildings and retained spaces. Winchester's new low carbon community will also address the need to create a sensitive landscaped edge to the ridge line along Hursley Road, being one of the main entry points into the historic city centre.
- 5.36. As such, Bloor considers that a key benefit of the site in heritage terms is that it can deliver significant housing growth without having an adverse impact on the historical setting of Winchester.
- 5.37. Based on the benefits and mitigation suggested by Bloor's technical consultant team, it is considered that the IIA rankings for objective 11 (those directly relevant to this subsection) should be updated to neutral as demonstrated in the table below.

Table 7: Provided IIA Ranking of criteria 11 of South Winchester Golf Course (Manor Parks) and Updated Ranking to reflect Proposed Mitigation

IIA Criteria	Manor Parks IIA Report Ranking	Manor Parks IIA Ranking with Proposed Mitigation
IIA 11: To conserve and enhance the district’s historic environment including its setting	Negative	Neutral

Vibrant Economy

- 5.38. Strategic Policy E1 Vibrant Economy sets out that WCC will encourage economic development and diversification that supports the WCC’s Carbon Neutrality Action Plan and Green Economic Development Strategy and is in accordance with the Local Plan vision.
- 5.39. Manor Parks will support WCC’s vision to create a vibrant economy through providing a range of uses to create a thriving community and also increase local economic prosperity and social interaction. At the heart of the development will be the opportunity to create a mixed-use village centre with a range of choices to access community facilities, local education, nursery, GP polyclinic, and a community home working hub and café with flexible workspace to help facilitate small scale start-ups and interaction space for local home workers. The precise uses is subject to further evidence and commercial considerations but there is a real opportunity to create a heart to the new development, advocating uses to meet local needs in a sustainable way.
- 5.40. Socio-economic benefits based on a community of up to 1100 new homes and two GP polyclinics as proposed at Manor Parks will be as follows:
- 60 average construction jobs per year.
 - £6 million of residential expenditure retained in Winchester.
 - £10.9 million estimated Community Infrastructure Levy.
 - £16.1 million additional gross value added per annum associated with additional jobs.
 - 340 permanent jobs including home working, medical, retail and food.
- 5.41. Furthermore, the site is in proximity to major employers, including Winchester Hospital (2.09 km) and Winchester University (2.25 km) which could be accessed on foot or cycle and via public transport.
- 5.42. Based on the benefits and mitigation suggested by Bloor’s technical consultant team, it is considered that the IIA rankings for objectives 7 and 8 (those directly relevant to this subsection) should be updated to significant positive and positive as demonstrated in the table below.

Table 8: Provided IIA Rankings of criteria 7 and 8, of South Winchester Golf Course (Manor Parks) and Updated Ranking to reflect Proposed Mitigation

IIA Criteria	Manor Parks IIA Report Ranking	Manor Parks IIA Ranking with Proposed Mitigation
IIA 7: To ensure essential services and facilities and jobs in the district are accessible	Positive	Significant Positive
IIA 8: To support the sustainable growth of the district's economy	Neutral?	Positive

Living Well

- 5.43. Living Well is a core objective of the R19 LP which seeks to promote health by improving air quality, increasing opportunities for walking, and cycling and enhancing access to outdoor recreation and the natural environment. To deliver inclusive communities with a range of services and infrastructure in sustainable neighbourhoods, including community infrastructure, blue/green infrastructure and employment, and support measures which encourage sustainable and active transport and minimising the need to use the private car to travel (page 21). As such, this theme underpins all topics of the R19 LP.
- 5.44. The Manor Parks masterplan and key land uses, and activities are designed to remove barriers and enable people to partake in healthier lifestyles, including greater connectivity to the natural environment for recreation, during active travel and social settings, all aiding positive physical, mental, and social health and wellbeing.
- 5.45. To deliver the above, the scheme will be designed in accordance with the 20-minute neighbourhood principles and as such would: provide easy access to local goods and services including grocery stores and GPs; support healthy eating and increase physical activity by encouraging active modes of transportation and support improving air quality. As such, the scheme will provide a new walkable and permeable neighbourhood, through implementation of practical measures, such as allotments and community orchards and through wayfinding techniques to create a safe, secure, and memorable place.
- 5.46. The social and health value therefore extends beyond the site, with shared amenities, facilities, and community assets to complement and integrate with the existing and wider community. As such, Manor Parks would provide support to the ageing population living within the Badger Farm and Oliver's Battery ward by ensuring all necessary facilities within a 20-minute radius, which is considered particularly beneficial to this age demographic. Further, residents will be in contact with the outdoor environment, the landscape, ecology, and biodiversity.
- 5.47. Some further considerations that the proposed development would integrate to support the older proportion of the population to live healthy, independent lives for longer which could include:

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- Providing dwellings which are accessible and adaptable with the potential to exceed minimum requirements defined in local policy to reflect the older than average local population
- Integrating dementia friendly design principles in both internal and external environments.
- Integrating secured by design principles so external environments feel safe and do not deter the elderly population from getting out and socialising.
- Provide external community spaces and indoor hubs so that there are opportunities for social interaction all year.

5.48. The concept and layout of the development seeks to deliver a community for everyone, all abilities, and all age groups. It will be designed with an understanding of how well-designed places effect the movement choices for all user groups and address public health challenges.

5.49. Based on the benefits and mitigation suggested by Bloor’s technical consultant team, it is considered that the IIA rankings for objectives 4 (those directly relevant to this subsection) should be updated to significant positive as demonstrated in the table below.

Table 9: Provided IIA Ranking of criteria 4, of South Winchester Golf Course (Manor Parks) and Updated Ranking to reflect Proposed Mitigation

IIA Criteria	Manor Parks IIA Report Ranking	Manor Parks IIA Ranking with Proposed Mitigation
IIA 4: To improve public health and wellbeing and reduce health inequalities in the district	Positive	Significant Positive

Summary

5.50. As set out in the above subsections, the proposed development at Manor Parks is capable of successfully delivering the key issues and priorities set out in the R19 LP, including but not limited to, low carbon affordable homes, in a 20-minute sustainable neighbourhood.

5.51. Based on the above points, Bloor disputes the conclusion raised by WCC at paragraph 9.6 of the R19 LP that “*Sites have been selected for allocation based on whether they would help deliver the Local Plan strategy, an assessment of their benefits and impacts (including Sustainability Appraisal and viability assessment) and whether they can provide the types of housing needed in various locations*” and suggests that Manor Parks presents a better opportunity to assist WCC in achieving its vision for the District than many of the sites allocated. This point is re-emphasised in the IIA table below which provides the cumulation of the rankings set out above as adjusted for the scheme’s inherent mitigation.

Table 10: Integrated Impact Assessment (IIA) Ranking of South Winchester Golf Course (Manor Parks) and Updated Assessment including Proposed Mitigation

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IIA Criteria	Manor Parks IIA Report Ranking	Manor Parks IIA Ranking with Proposed Mitigation
IIA 1: To minimise the district’s contribution to climate change through a reduction of greenhouse gas emissions from all sources and facilitate the aim of carbon neutrality by 2030	Positive	Significant Positive
IIA 2: To reduce the need to travel by private vehicle in the district and improve air quality	Positive	Significant Positive
IIA 4: To improve public health and wellbeing and reduce health inequalities in the district	Positive	Significant Positive
IIA 7: To ensure essential services and facilities and jobs in the district are accessible	Positive	Significant Positive
IIA 8: To support the sustainable growth of the district’s economy	Neutral?	Positive
IIA 9: To support the district’s biodiversity and geodiversity	Double Negative	Positive
IIA10: To conserve and enhance the character and distinctiveness of the district’s landscapes	Neutral?	Positive
IIA 11: To conserve and enhance the district’s historic environment including its setting	Negative	Neutral
IIA 12: To support the efficient use of the district’s resources, including land and minerals	Double Negative	Double Negative
IIA 13: To protect the quality and quantity of the district’s water resource	Neutral	Neutral
IIA 14: To manage and reduce flood risk from all sources	Neutral	Positive

6. Conclusion

- 6.1. This representations document responds to the WCC R19 LP Consultation and promotes the land at Manor Parks on behalf of Bloor for a new low carbon residential-led development.
- 6.2. **Section 1** of the report provides an introduction and background to the history of the site. The site is being promoted by Bloor and was submitted to the SHELAA titled 'Land at South Winchester Golf Course' (ref: HU01) where it was deemed to have capacity for up to 1,071 dwellings. The SHELAA classified the site as deliverable and developable and could commence within the next ten years. Bloor agrees with the first two points, however notes that the site could commence post 2026 and, as such, within the first 1-10 years of the plan period utilising a phased approach. Furthermore, the site could deliver up to 1,100 units. The site was ranked a green for all matters expect those relating to proximity of listed buildings, location in the countryside and accessibility for which it received amber rankings. As set out in **Section 5**, the scheme would respond positively to and seek to enhance the setting of the heritage assets. It is worth noting that all major SHELAA sites received an amber or red ranking for location in the countryside.
- 6.3. It is at **Section 2** that this representation document begins to explore WCC's draft R19 consultation document. It is noted that Bloor agrees with the vision, priorities and objectives presented in the document, however, raises concerns regarding the spatial distribution strategy, the suggested housing requirement of the district and a number of the technical policies. Bloor object to the following policies and evidence base documents:
- Strategic Policy SP2 – Spatial Strategy and Development Principles
 - Policy CN2 – Energy Hierarchy
 - Policy CN3 – Energy Efficiency Standards to Reduce Carbon Emissions
 - Policy CN8 – Embodied Carbon
 - Policy D6 – Previously Development Land and Making Best Use of Land
 - Strategic Policy T1 – Sustainable and Active Transport and Travel
 - Strategic Policy H1 - Housing Provision
 - Strategic Policy H2 – Housing Phasing and Supply
 - Policy H6 – Affordable Housing
 - Local Plan Viability Report (July 2024)
 - Duty to Cooperate – Statement of Compliance (September 2024)
 - Level 2 Strategic Flood Risk Assessment (July 2024)
 - Strategic Flood Risk Assessment (June 2023)
 - Integrated Impact Assessment (IIA) Regulation 19 (July 2024)
 - Strategic Transport Assessment (August 2024)
- 6.4. Bloor emphasises the importance of the use of the draft standard methodology requirement of 1,099 dpa as opposed to 676 for the remainder of the plan period, which would generate a need of 20,333 dwellings across the current plan period (1 April) 2020 to (31 March) 2040, c. 7,000 more dwellings than currently

being planned for. If WCC, do not adopt their new draft standard method requirement, in order to plan positively, WCC should be planning in line with their recent delivery of 996 homes per year, or 18,685 dwellings across the current plan period (1 April) 2020 to (31 March) 2040. Without adopting either of these approaches and proactively planning for increased need within Winchester district and the wider sub region WCC will be responsible for amplifying the already critical housing crisis. Bloor draws WCC back to the statement made by DPM SOS Angela Ratner in her letter New Homes Accelerator Programme to Unblock Thousands of New Homes [dated 29th August 2024] *“It is because of this I know that, like every member of the Government, you will feel not just a professional responsibility but a moral obligation to see more homes built. To take the tough choices necessary to fix the foundations of our housing system. And we will only succeed in this shared mission if we work together – because it falls to you and your authorities not only to plan for the houses we need, but also to deliver the affordable and social housing that can provide working families with a route to a secure home” [our emphasis added].*

- 6.5. As set out in **Section 4**, Bloor consider that the spatial strategy insufficiently prioritises Winchester Town as the most sustainable location for growth. The proposed distribution of development commits disproportionate growth to areas with limited active travel and public transport infrastructure. This will result in an over-reliance on private car use that will inevitably lead to increased congestion, emissions, and community severance, negatively impacting resident health and well-being. This approach contradicts the Plan's own Integrated Impact Assessment ('IIA') criteria and conflicts with both current and emerging national planning policy, raising significant questions about the R19 LP's soundness. Bloor consider that the way to ensure consistency is to allocate a greater percentage of new development in and around Winchester Town.
- 6.6. Bloor considers that Manor Parks, due to the reasons set out in Section 5, is the optimal location to help WCC meet housing requirement and deliver their Local Plan objectives. Furthermore, given Bloor's proven track record of national and regional delivery, and their single ownership of the site (which is often not the case on larger strategic sites), the site is available, suitable and deliverable as per the definition in the NPPF and Bloor can ensure contribution within the first 5 years of the plan post adoption. This in turn will help WCC protect themselves from speculative applications once the draft NPPF and revised standard methodology is published.
- 6.7. Bloor summarise that:
- Manor Parks is available, suitable and deliverable as per the definition in the NPPF.
 - There are no technical showstoppers or constraints that would prevent this site coming forward for development.
 - Manor Parks is in a highly sustainable location adjacent to Winchester Town, which is evidenced to be the most sustainable location for development to deliver against the local plan objectives by both WCC's own evidence base and Bloor's evidence base.
 - Winchester is one of the least affordable places to live in the South East with housing prices still rising. There is a chronic and acknowledged lack of affordable housing supply.

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- The R19 LP housing requirement is not sound, the housing requirement is significantly below both the new draft standard method and their recent annual delivery rates.
- WCC will not deliver the government's key growth messages and will not be making the difficult decisions now to allocate more land for housing which the SoS is encouraging them to take.
- If the Local Plan does come forward as drafted, a strongly worded review policy needs to be included which requires an immediate Local Plan review which includes a specified end date.
- WCC is advocating a housing trajectory which is not building the housing pipeline that the government is requesting.

6.8. Without the proposed amendments, Bloor do not consider that an Inspector will be able to find the R19 LP sound or legally compliant and therefore the Local Plan will fail Examination.

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