

Winchester Regulation 19 plan reps

About you

What is your full name or client's name if acting as an agent?

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Please confirm by ticking the box below that under GDPR you understand and give your consent for your personal details to be sent to the programme officer. (If you do not confirm that you are happy for your details to be shared we unfortunately cannot accept your representation at this stage of the plan making process)

Yes.

Please select the box below if you would like to be kept up to date on the developments to the Local Plan via the email you have provided?

Yes I would like to be kept up to date with Local Plan developments.

INTRODUCTION

1.0 Strategic Policy SP1 Vision and Objectives

Do you support the approach in policy SP1 – Vision and objectives? If no, please explain how this policy should be amended?

Bloor Homes support in principle the approach set out in Policy SP1 in particular the need to deliver the aspirations for each sub-area. These aspirations must include provision of sufficient housing to meet objectively assessed need and the identified unmet need of its neighbours, both supporting the sustainable development of Winchester Town, the South Hampshire Urban Areas and the market towns and larger rural settlements, including Wickham. It should also be acknowledged that the revised standard method proposed by the new Government will further increase housing requirements in Winchester.

Bloor Homes supports the recognition at paragraph 2.12 that the ability to provide affordable housing is influenced by whether a site is greenfield or brownfield and whether there is a need to mitigate the impacts of nitrogen and/or phosphorous. It should be recognised within this paragraph that there are other potential costs that can affect the viability of developments, for example, site-specific infrastructure costs and abnormal costs. The NPPF and NPPG suggest that a typology approach is taken to the assessment of viability. Whilst this approach is acknowledged, it must equally be acknowledged that every site is different and there may be a need for site specific viability assessments, as identified at Paragraph: 006 Reference ID: 10-006-20190509 of the NPPG.

We welcome the recognition at paragraph 3.1 of the role that the three areas within Winchester have to play in addressing local needs. This includes Winchester Town, which is a highly sustainable location for development, the South Hampshire Urban Areas and the Market Towns and Rural Areas, within which development can contribute to the future sustainability of this area.

In respect of the latter point, there is further emphasis on page 19 where it is stated that “new development will address the needs of the area and enhance the sustainability of communities” and “The market towns and rural villages will remain attractive settlements, accommodating changes to support evolving communities and the economy, with modest growth to meet their needs underpinning the resilience of local services and facilities whilst retaining their individual identity, historic assets and rural character”. This needs to be fully reflected in the housing allocations proposed in this area, alongside the role the other parts of Winchester.

In line with our previous representations on the Regulation 18 Plan, we recommend that Criteria iv under the Tackling the climate emergency and creating a greener district objective should be amended to read “*Ensure that development is designed to provide biodiversity net gain and does not have an **unacceptable** adverse impact on landscape character and historic environment and the unique and special characteristics of the South Downs National Park*”. This is in recognition that development can impact landscape character and the historic environment, but this need not be unacceptable.

Moreover, we consider that an amendment to Criteria vii of the same objective is required, and propose that it to be revised to state “*Maximise the use of low carbon infrastructure and construction methods and drainage systems and encourage the use of locally sourced materials, **where possible**, to protect the integrity of the natural systems and resources*”. The additional wording recognises that flexibility needs to be applied to the particular circumstances of a development.

As previously mentioned in our Regulation 18 representation, the Vision and Objectives should be inserted within the Strategic Policy SP1 itself in a succinct form. Presently the policy cross references to supporting text which is not a statutory part of a plan and has a purpose for setting the context and justification for a policy.

In addition, as mentioned in our previous representation, whilst it is important for the plan to have ambition it is necessary that the vision and objectives are practical, affordable and feasible and therefore the theme of deliverability should also be an emphasis of this overarching policy.

The adopted Core Strategy Vision recognises the need for all three parts of the district, to play their part. Alongside growth in Winchester Town and the South Hampshire Urban Area, market towns and large villages also need growth to remain viable, respond to local needs and to be sustainable in the future. Appropriate growth needs to be directed to these settlements to ensure the Vision can be achieved.

Alongside growth in other parts of the district, market towns and villages need to be able to grow to support the shops, services and facilities that they offer existing and future residents. The Vision and the plan should take forward this aim to ensure that the market towns and villages are allowed to grow in the period up to 2040. The plan, as currently drafted does not allocate sufficient housing at settlements such as Wickham, a Larger Rural Settlement to support their sustainability.

Given the above, Bloor Homes does not consider that the ambitions of Policy SP1 will be delivered with the ability to address the housing needs of the area and enhance the sustainability of communities compromised. As drafted, the plan cannot therefore be found sound.

In the particular case of Wickham, whilst we support the draft allocation at Mill Lane (draft Policy WK5), we consider that this allocation should be expanded to encompass the Land at Junction of Mill Lane, Wickham (WI06). This forms part of the masterplan previously promoted and would increase the total number of units from 40 to approximately 100. This modest level of additional growth in this location would still enable Wickham to retain its identity and would not unacceptably impact its heritage or rural character. It would also contribute to the significant level of unmet need within the Partnership for South Hampshire area and to the requirement for additional housing provision under the proposed amended standard method.

2.0 Strategic Policy SP2 Spatial Strategy and Development Principles

Do you support the approach in strategic policy SP2 spatial strategy and development principles? Not positively prepared (NPPF para 35). If no, please explain how this policy should be amended?

Whilst Bloor Homes supports the amended policy in principle, it remains concerned that the approach proposed would result in a plan which is not positively prepared, is not justified and is not effective as it would not provide a strategy that provides sufficient housing to meet objectively assessed need and the identified unmet need of its neighbours and does not adequately support the sustainability of Winchester Town and the market towns and larger rural settlements, including Wickham.

Bloor Homes agrees with the principle of supporting the delivery of new housing and economic growth across the three identified spatial areas: Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Area. It is emphasised that all three spatial areas are critical to delivering on the district's growth requirements. It therefore welcomes the increased provision in the Market Towns and Rural Area.

In stipulating a target for new homes in each spatial location however, it is highlighted that any such target must not be considered as a maximum, but a minimum. Whilst it is noted that the policy wording as currently drafted states 'for about' to suggest these are not fixed targets, it is considered that the policy wording should be clearer, i.e., that these are minimum targets.

NPPF paragraph 11 states that *'plans should positively seek opportunities to meet the*

development needs of their area, and be sufficiently flexible to adapt to rapid change.’ whilst the NPPG is clear that the standard methodology set out within it provides a “minimum” figure of housing need (ID: 2a-002-20190220). It is a “starting point” (ID: 2a-010-20201216). This particularly applies in respect of the need to contribute to addressing the (growing) unmet need within the Partnership for South Hampshire area, as part of the Duty to Cooperate.

Consequently, to ensure that the draft plan is flexible and positively prepared to cover the whole of the plan period, the realistic need for homes above these targets should be acknowledged within the policy wording. The wording of i, ii and iii amended to read ‘at least XX new homes’.

Winchester City Council should consider providing additional development, beyond that set out in the emerging plan, during the plan period to meet the unmet needs of neighbouring authorities and any non-delivery on allocated sites.

Having established that there is a need to increase the current housing provision, there is a range of large and smaller sites across the three spatial areas, with potential to provide additional growth, for example Land at Mill Lane, Wickham, which is explained further below.

The key to a successful plan is to ensure that each area achieves a level of growth that enables their economies to grow and not stagnate, ensures that services and facilities can continue to be provided so that the sustainability credentials of both higher and lower tier settlements can be maintained and enhanced.

There is a chronic affordability challenge within the district, as set out in the SHMA (July 2024). Relying on existing allocations will not be sufficient and will further compound the district’s affordability pressures. There is therefore a need for additional housing to be brought forward.

By way of example, Wickham is a sustainable settlement, with sustainable options for growth and is rated as a larger settlement in the 2024 Settlement Hierarchy, with a reasonable level of services and facilities. There are sustainable options for growth at Wickham which would support and maintain existing services and facilities within the town. This has been recognized through the addition of the draft allocation Policy WK5, Mill Lane.

The draft allocation Land at Mill Lane, Wickham is conveniently located within a 15-minute walking distance of the market square which features essential amenities such as retail facilities, and there is a local primary school, a health centre, a community centre and playing fields. This accessibility aligns with and even exceeds the ambition for 20-minute neighbourhoods, under Strategic Policy T1. Additionally, the market square provides regular bus services to Winchester and Fareham, enhancing connectivity.

It is a sustainable location for new homes that benefits from many locational advantages and should be expanded to incorporate Land at the junction of Mill Lane, Wickham (WI06), increasing the total number of units on the site from 40 to 100. The provision of additional housing at this location will ensure that the plan is positively prepared and remains effective over its period. The number of homes to be provided within Market Towns and Rural Area set out at criteria iii should therefore be increased to reflect the sustainable opportunity at Mill Lane.

CARBON NEUTRALITY AND DESIGNING FOR LOW CARBON INFRASTRUCTURE

3.0 Strategic Policy CN1 Mitigating and Adapting to Climate Change

Do you support the approach in policy CN 1 – mitigating and adapting to climate change? If no, please explain how this policy should be amended?

In line with our previous representations on the Regulation 18 Plan, Bloor Homes supports in principle the ambition for development proposals to mitigate and adapt to climate change, as well as helping the district meet its targets contained within the Council's Climate Emergency Declaration.

The application of this policy must be proportionate and take into account site-specific considerations. It should be recognised that it may not be possible for all of the criteria to be met on each site. For example, there are significant spatial implications arising from the provision of rainwater gardens, including next to roads and footways. This needs to be considered alongside the views of Hampshire County Council as highways authority as well as the potential implications for viability, long-term future maintenance and design considerations.

Requiring developments to provide open space for people to grow their own food is also admirable, but consideration needs to be given to how such space would be managed and maintained, unless as a traditional allotment, and the impacts that such areas would have for developers who are already struggling to meet stringent nutrient neutrality requirements. Furthermore, increasing green infrastructure requirements could have a detrimental impact on the quantum of homes a site can deliver and lead to the inefficient use of sustainably located sites, particularly smaller sites. Such provision may be more appropriate in some locations than others. There would equally need to be demand from new residents for such facilities which simply won't be known at the plan-making or even necessarily at the planning application stage of the development process.

In applying criteria xi and xii, which Bloor Homes does not object to in principle, the Council must ensure that such requirements are looked at in the round in order to ensure that proposals are designed to fit their site context. In some cases, it may be more appropriate to design buildings in a different orientation, for example, where a focal building is required to face a key space or access arrangement.

Similarly, whilst Bloor Homes does not object to the principle of the addition of criteria xiv, it should be recognised that the use of green roofs and walls will not be appropriate in many instances and will add additional cost to development, which must already address a wide range of requirements.

Whilst the climate change and environmental goals of the plan are understandably ambitious given that the council has declared a climate change and nature emergency, due consideration must be given to the viability implications of such policies, otherwise the plan will simply not facilitate delivery of the growth levels required during the plan period.

4.0 Policy CN2 Energy Hierarchy

Do you support the approach in policy CN 2 – energy hierarchy? If no, please explain how this policy should be amended?

In line with our previous representations on the Regulation 18 Plan, Bloor Homes broadly supports the proposed energy hierarchy, and in particular the need to minimise

energy demand by employing the 'fabric first approach.' However, it is essential to strike a balance between these aspirations and the practicalities of implementation and financial viability and therefore, Bloor Homes objects to this policy.

In addition to the above, the policy needs to include more detail on what interventions should be considered at each stage of the hierarchy. As currently drafted, the policy does not include sufficient detail to enable applicants to understand what is required and as such is open to confusion and interpretation. Furthermore, there is little information set out in the support text which aids the reader to understand the Council's requirements. Similarly, a review of the Carbon Neutrality and Embodied Carbon topic paper and evidence based topics does not assist.

5.0 Policy CN3 Energy Efficiency Standards to Reduce Carbon Emissions

Do you support the approach in policy CN 3 – energy efficiency standards to reduce carbon emissions? If no, please explain how this policy should be amended?

The commitment of the Council to offer leadership for the district to be carbon neutral by 2030 is noted, ahead of the UK's legally binding target of 2050. To achieve this in practice very challenging local standards continue to be put forward in the draft policy.

Bloor Homes is concerned that the scale of step change proposed may be too stretching in practice for the construction industry to adapt to and a phased approach is preferred to ensure that change is deliverable. The policy needs to strike a better balance in terms of ambitions versus affordability and feasibility.

There are also practical issues around whether a local approach will be onerous to assess and apply in practice due to the technical complexities. Generally, an approach that links to national standards and regulations is preferred which apply across local authority boundaries and provides for consistency in the market. Delivering improvements to energy efficiency through building regulations has particular advantages over delivering varying approaches across the country, in that it provides a single approach that all developers understand and can be rolled out at scale.

As noted at paragraph 4.22 of the consultation document, the Future Homes standard is to be introduced nationally from 2025, including an uplift in standards in Building Regulations, to ensure that new homes built from this time achieve 75-80% less carbon emissions than homes delivered under the old regulations. Given that the earliest that the Local Plan will be adopted is October 2025 a phased approach which includes standards applicable from 2025 (in line with the Future Homes standard) should be considered. This is to ensure that the policy is deliverable over the plan period. Furthermore, these standards are in line with meeting the 2050 net zero target.

If the local plan is to go beyond existing and forthcoming standards, it must ensure that policy requirements are consistent with national policy and with the December 2023 Minister of State for Housing Ministerial Statement. Furthermore, it must take account of the High Court Judgement of 2nd July 2024 [2024] EWHC 1693 Admin which confirms that the WMS is lawful and that 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. The High Court Judgement, with its intention to prevent the application of inconsistent standards. Bloor Homes considers that use It is noted that at paragraphs 5.8 to 5.10 of the Carbon Neutrality and Embodied Carbon Topic Paper, the Council advises that it wrote to the Secretary of State expressing concern that the Written Ministerial Statement restricted the ability to set energy performance standards other than through TER, measured through the Standard Assessment Procedure (SAP). The response received confirms that whilst local plan makers are not precluded from setting standards that go further than Building Regulations, this must be "*in a way that is coherent and easily understandable for housebuilders*".

The impact of the additional requirements set out in draft Policy CN3 on the viability and deliverability of development must be demonstrated to have been fully considered and be acceptable, Bloor Homes does not consider to be the case. Whilst it is acknowledged that some financial modelling of the cost implications of the additional requirements has been undertaken, Bloor Homes does not consider that the costs of implementation of the draft policy have been fully and properly considered and underestimates the true cost of this policy, It is not therefore justified

The draft policy also includes on-site renewable energy generation requirements that appear overly prescriptive for certain types of site. The installation of effective solar generation, for example, will not be feasible for every site – due to shading, site size or heritage considerations, for example. In these circumstances it may simply not be possible to achieve net-zero operational carbon on-site and off-site renewable energy generation and offsets may be necessary. The policy is currently silent on these aspects, but they may need to be considered as part of the phased approach to introducing the local standards so that the policy can be effective. In addition, there is a lack of recognition that there is often a mismatch between renewable electricity generation and consumption, particularly during winter months, which has the potential to limit the ability to balance demand with generation.

Bloor Homes objects to the imposition of the requirement in draft Policy CN3 to provide energy model and calculations in relation to outline applications. It is unlikely to be feasible or practical to provide such information at this stage, as insufficient detail may be known to enable such information to be provided in a meaningful way. Bloor Homes consider that such information should be provided at the detailed stage of the application process. The policy should be revised to state that *outline applications are not expected to undertake assessment of embodied carbon emissions.*

Draft Policy CN3 also fails to recognise the Government's commitment to decarbonize electricity generation by 2035 and the requirement for gas boilers to be banned from 2035. Given that the plan is intended to run to 2040, this should be acknowledged within supporting text and provision made within the application of this policy for the achievement of these targets and also future changes to legislative requirements and national policy related to climate change targets.

In light of the above Bloor Homes objects to draft Policy CN3 and requests that it is amended as follows:

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:*

- ~~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.~~

Meeting the policy:

Energy strategy should outline compliance with the policy requirements. The following table indicates the energy modelling and calculation requirements at different planning application stages.

Requirements - Energy Modelling/ Energy Use Intensity (EUI) calculations

Pre-App - Modelling not required, but confirmation of how Policy CN3 will be met.

Outline - ~~Typical dwellings/buildings~~ **Modelling not required, but confirmation of how Policy CN3 will be met.**

Full Planning & Reserved Matters - Representative sample of exact dwelling/building design

6.0 Policy CN4 Water Efficiency Standards in New Developments

Do you support the approach in policy CN 4 – water efficiency standards in new developments? If no, please explain how this policy should be amended?

Bloor Homes acknowledges the issues faced in Winchester district around water stress. However, the proposed water standard of 100 litres per person per day (l/p/d) is inconsistent with the Environment Agency's guidelines on Water Efficiency and Planning, published 18/08/2023, within the evidence base. The Environment Agency

advises that local planning authorities in the Solent and South Downs should ensure that new residential developments achieve an average water consumption of at least 110 l/p/d. While Southern Water may be promoting a lower benchmark, this does not provide adequate justification or evidence for deviating from the Environment Agency's recommendations. Such evidence does not appear to be on the council's local plan evidence webpage. As such the draft policy is not justified.

The practical implications of achieving such a standard should not be underestimated and whilst Bloor Homes encourages water efficiency in new development, there is a need for a wider behavioural shift to support such a move which is beyond the remit of the development industry.

7.0 Policy CN8 Embodied Carbon Assessment

Whilst it is laudable to seek buildings to be designed in a way that are flexible and adaptable as stated in paragraph 4.52, it is not possible to know now how buildings might be used in 15-20 years' time, towards the end of the plan period and this should be acknowledged.

The need to reduce embodied carbon, where possible, is recognised by Bloor Homes, however, as currently worded, Policy CN8 is unclear as to what should be included in the assessment. This should be clarified as the evidence bases informing this policy refers to two different assessments, upfront embodied carbon and lifecycle embodied carbon.

In addition, and as set out in Bloor's response to energy efficiency, the level of detail required to undertake an embodied carbon assessment will not be known at outline application stage and it would therefore not be reasonable to expect such calculations to be carried out at this stage. This should be made clear in the policy through the addition of the following wording:

Outline applications are not expected to undertake assessment of embodied carbon emissions, although this can be provided during Reserved Matters Applications.

HIGH QUALITY WELL-DESIGNED PLACES AND LIVING WELL

8.0 Strategic Policy D1 High Quality, Well Designed and Inclusive Places

Do you support the approach in policy D1 – High quality, well designed and inclusive places? If no, please explain how this policy should be amended?

Bloor Homes supports in principle the high-quality design principles set out in Policy D1 and has sought to incorporate these in the emerging proposal for its site at Mill Lane, Wickham through a robust analysis of the constraints and opportunities that it presents. However, as previously stated within our representations on the Regulation 18 Plan, it is not necessarily appropriate, or indeed possible for the design process for new development to respond to the 'immediate' and 'wider' area as this could stifle the creation of new characters or create a confused approach to development.

It should also be recognised in the local plan, that in some circumstances it may not be possible to achieve all of the principles identified and this policy should be applied with suitable flexibility to ensure that it is justified.

9.0 Strategic Policy D4 Design Principles for Market Towns and Rural Villages

Do you support the approach in policy D4 - design principles for market towns and rural villages? If no, please explain how this policy should be amended?

As previously stated within our representations on the Regulation 18 Plan, there is some overlap between Strategic Policy D4 and Strategic Policy D1. It is unclear why a separate policy for the Market Towns and Rural Villages is needed and as such this policy is not justified.

10.0 Strategic Policy D5 Masterplans

Do you support the approach in Policy D5 – Masterplans? If no, please explain how this policy should be amended?

As previously stated within our representations on the Regulation 18 Plan, Policy D5 refers to the need for masterplans to be prepared on larger sites. However, the policy and supporting text is unclear on what comprises a larger site. This must be clarified. Accordingly, the policy as currently drafted is not justified or effective.

11.0 Policy D6 Previously Developed Land and Making Best Use of Land

Do you support the approach in policy D6 – Brownfield development and making best use of Land?

If no, please explain how this policy should be amended?

As previously stated within our representations on the Regulation 18 Plan, whilst prioritising brownfield sites is compliant with the approach set out in the NPPF, it should be recognised that a number of Winchester City's brownfield site allocations have not come forward, despite their allocation in successive local plans. For example, Policy W7 - Central Winchester Regeneration is an existing Local Plan allocation (WIN4) that has been carried forward. This site was also allocated prior to the current Local Plan as Policy W.2 – Broadway/Friarsgate (Silver Hill) within the 2006 Local Plan Review. It has still not been delivered. Similarly, Policy W8 – Station Approach Regeneration Area is also an existing Local Plan allocation (WIN7) that has been carried forward.

In bringing forward brownfield sites, it is advisable to apply a non-implementation rate due to the complexities surrounding such sites, and the evidence on non-delivery or alternatively provide additional allocated sites, such as at Wickham, which can provide additional housing to that proposed,, in order to ensure that housing targets are met in

the event that there are problems with the delivery of brownfield sites.

There is an over reliance on brownfield sites some which have not been delivered which has the potential to affect the deliverability and therefore the effectiveness of the Local Plan. Should these sites not come forward as expected this would result in part of the buffer being used up.

Furthermore, brownfield sites are not expected to deliver the same level of affordable housing as greenfield. Draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02) has the ability to deliver up to 16 affordable units (40% of the site) with the potential to deliver further affordable housing if this site was expanded to include Land at the junction of Mill Lane, Wickham (WI06). This would increase the total number of houses delivered on the site from 40 to around 100 and significantly elevate the number of affordable housing units from 16 to around 40 on the site.

Given the local plan's priority to deliver affordable housing, there is a disconnect between the reliance placed on brownfield sites which are not going to deliver the quantum of affordable housing that greenfield sites are expected to and consequently the strategy needs to be altered to provide a better balance between greenfield and brownfield.

12.0 Policy D7 Development Standards

Do you support the approach in policy D7 – development standards? If no, please explain how this policy should be amended?

Policy D7 as currently drafted requires that proposals comply with all national statutory standards related to environmental quality and proposals are accompanied by a statement setting out how such requirements have been met in designing the proposal. As stated in our Regulation 18 representation, this requirement is considered unnecessary and inappropriate in planning terms and is not justified.

SUSTAINABLE TRANSPORT AND ACTIVE TRAVEL

13.0 Strategic Policy T1 Sustainable and Active Transport and Travel

Do you support the approach in policy T1 – sustainable and active transport and travel? If no, please explain how this policy should be amended?

In order to ensure consistency with the NPPG, the use of the standard terms of Transport Assessment and Transport Statement should be used rather than 'Travel Assessment.' This also applies to the standard thresholds for when the different levels of assessment are required. Only where there is a significant increase in travel should this information be requested.

Bloor Homes recognises and supports the need for new proposed development to promote sustainable and active travel modes and minimise the need for car use. Furthermore, the application of 20-minute neighbourhoods within Policy T1 is also acknowledged to be an important design principle to guide development coming forward in the district.

The draft allocation under Policy WK5, Land at Mill Lane, Wickham is conveniently located within a 15-minute walking distance of the market square which features essential amenities such as retail facilities, a local primary school, a health centre, a community centre and playing fields. This accessibility aligns with and even exceeds the ambition for 20-minute neighbourhoods. Additionally, the market square provides regular bus services to Winchester and Fareham, enhancing connectivity. It is therefore ideally placed to provide opportunities for sustainable and active travel.

Given these factors, we would argue that the local plan should consider allocating additional housing at this site beyond the current draft allocation of 40 units. Specifically, we propose that Land at the junction of Mill Lane, Wickham (WI06), which is part of the original masterplan previously promoted, is included in the draft allocation. This would increase the total number of houses delivered on the site from 40 to around 100 and would assist in further maximising the accessibility and sustainability potential of the site.

14.0 Policy T3 Enabling Sustainable Travel Modes of Transport and the Design and layout of Parking for New Developments

Do you support the approach in policy T3 – Enabling Sustainable Travel Modes of Transport and the Design and Layout of Parking for New Developments?

The broad ambition of this policy is supported overall; whilst greater clarity has been provided in the amended policy as to what scale of development it would be applicable to, the policy requirements are unlikely to be achievable for all types / scales of development to which the policy applies. The policy continues to contain jargon including "active and e-mobility travel and car clubs" which isn't clearly explained in the accompanying supporting text.

15.0 Policy T4 Access for New Developments

Do you support the approach in policy T4 – Access for New Developments? If no, please explain how this policy should be amended?

Bloor Homes supports the need to provide for access for pedestrians, cyclists and those with mobility issues. The masterplan for Mill Lane, Wickham submitted in relation to the Regulation 18 consultation made every effort to accommodate these users.

Proposed allocation WK5 is located in proximity to a network of public rights of way, including footpaths and cycle paths that provide access into the South Downs National Park. In light of this, we consider that further supports the expansion of the draft allocation for Land at Mill Lane, Wickham to include the adjacent Land at the junction of Mill Lane, Wickham (WI06), which is part of the original masterplan proposal submitted to the Council.

BIODIVERSITY AND THE NATURAL ENVIRONMENT

16.0 Strategic Policy NE1 Protecting and enhancing Biodiversity and the Natural Environment in the district

Do you support the approach in policy NE1 – Protecting and enhancing Biodiversity and the Natural Environment in the district? If no, please explain how this policy should be amended?

Whilst Bloor Homes supports the key principles of Policy NE1 of ensuring that development proposals protect and enhance the natural environment and biodiversity of the district, further consideration is required in respect of the precise wording of some of the criteria to ensure that the plan is effective and consistent with national policy.

Criteria i of Strategic Policy NE1 fails to acknowledge the provision within paragraph 186 of the NPPF to, as a last resort, compensate for significant harm to biodiversity arising from development. This should be incorporated into criteria i of the draft policy. As it is currently drafted the policy is not consistent with the NPPF.

Clarity is also required in relation criteria iii as to what is meant by 'Ecological Network' as this is not defined in supporting text or the glossary.

Draft Policy NE1 is not currently consistent with the NPPF in that sites must be protected and enhanced "*in a manner commensurate with their statutory status or identified quality*". Policy requirements related to non-designated ecological assets should therefore be proportionate to the value of that asset.

17.0 Policy NE3 Open Space, Sport and Recreation

Do you support the approach in policy NE3 – Open Space, Sport and Recreation? If no, please explain how this policy should be amended?

The current policy wording lacks clarity and contains ambiguity. The term "intergenerational areas" is neither defined in the supporting text nor in the glossary. Moreover, it appears that this requirement is imposed on all developments, which is onerous. A more reasonable approach would be to establish a threshold for the amount of open space that necessitates the inclusion of intergenerational areas.

Regarding the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), in addition to providing open space within the development, there is potential to incorporate a substantial area of public open space to the north, should the allocation be expanded to include the land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan proposal.

18.0 Policy NE5 Biodiversity

Do you support the approach in policy NE5 – Biodiversity? If no, please explain how this policy should be amended?

Bloor Homes acknowledges the importance of permitting development which maintains, protects, and enhances biodiversity. Notwithstanding this, criteria i of the policy should be amended to reflect the requirement of paragraph 180 of the NPPF

that sites are protected “*in a manner commensurate with their statutory status or identified quality in the development plan*”.

Criteria iv) should also acknowledge the role of compensation (as a last resort), in order to be compliant with paragraph 186 of the NPPF.

It is unclear from the wording of criteria vi) if this is intended to reflect Paragraph 186 b) of the NPPF. If this is the case, the wording of this criteria needs to be clearer such that it more closely reflects this paragraph.

As currently drafted the policy is not consistent with national policy and is unsound. It should be amended as follows:

Criteria i) Protects sites of international and national importance, and local nature conservation sites and SINCS, from inappropriate development, **in a manner commensurate with their statutory status**;

Criteria iv) New development will be required to avoid adverse impacts, or if unavoidable ensure that impacts are appropriately mitigated, including impacts on functionally linked land. **As a last resort, compensation will be considered.** Developments within 500 metres of the SPA/Ramsar FLL should produce a Construction Environmental Management Plan (CEMP) to address potential impacts to these habitats during the construction phase.

19.0 Policy NE6 Flooding and Flood Risk

Do you support the approach in policy NE6 – Flooding and Flood Risk? If no, please explain how this policy should be amended?

Criteria i) of draft Policy NE6 seeks to require the Sequential Test in all cases, and the Exceptions Test if required. The NPPF is clear that the Sequential Test is not required to be undertaken on allocated sites where this test has already been carried out. Furthermore, Government guidance outline further examples where the sequential test is not required.

Furthermore, the draft policy and supporting text should make reference to the Strategic Flood Risk Assessment, Strategic Flood Risk Assessment Level 2 and Flood Risk Sequential and Exception Test Statement to confirm the council’s approach to flood risk and the allocation of sites for development.

In addition, Bloor Homes consider further detail should be included in Policy NE6 regarding sustainable drainage principles that are expected to be considered.

As currently worded, the draft policy is not consistent with national policy and is unsound. It should be amended as follows:

i. Applies a Sequential Test to the location, **in line with the NPPF and associated flood risk assessment guidance**, and the Exception Test if required, and applying the sequential approach at the site level6;

20.0 Policy NE8 South Downs National Park

Do you support the approach in policy NE8 – South Downs National Park? If no, please explain how this policy should be amended?

The revised policy provides more detailed guidance and expectations compared to the previous iteration within the regulation 18 plan. The regulation 19 policy introduces additional details about development proposals being "expected to take account of the National Park assessments of landscape and tranquillity" and that they should "demonstrate how a proposal conserves and enhances the special qualities of the Park."

Bloor Homes agrees that development within the setting of the National Park should be sensitively located and designed. However, the policy text as currently wording goes beyond this, referring instead to the statutory purposes of National Parks.

The policy as drafted does not comply with the NPPF and should be amended to reflect the wording within the NPPF, as set out in paragraph 182.

It should be amended as follows:

'Development **within the setting of** the South Downs National Park will only be permitted where it would **be sensitively located and designed to avoid or minimise adverse impacts on the designated areas and take account of the national park's status as an International Dark Sky Reserve.**'

Whilst the draft allocation Land at Mill Lane, Wickham (Policy WK5) is close to the South Downs National Park, it is outside this designation and will be appropriately designed to avoid or minimise impacts on the national park, as required by the NPPF.

The previously submitted masterplan submitted with Bloor's regulation 18 representation includes land to the north of draft allocation WK5, in proximity to the national park. The masterplan responds to this by identifying the northern area as an open area, thus minimising impacts on the national park. A new copse and tree planting could act as a landscape buffer along the northern boundary of the residential development to further strengthen the containment of the site, protecting the setting of the National Park.

21.0 Policy NE9 Landscape Character

Do you support the approach in policy NE9 – Landscape Character? If no, please explain how this policy should be amended?

Bloor Homes supports the principle of permitting new development where it protects and enhances the district's landscape character. In particular, this includes where development proposals have been informed by the existing landscape character.

The proposal at Mill Lane, Wickham has been developed through careful analysis of the landscape features and character of the site and its surroundings. The site provides a gateway to both Wickham and the adjacent South Downs National Park, and in the event that the draft allocation were to be expanded to include the land at the junction of Mill Lane, Wickham (W106), which was part of the original masterplan proposal, the northern part of the site would be retained as open space, with new copse and tree planting to act as a landscape buffer along the northern boundary of the residential development.

Existing woodland around the edge of the site and individual trees around the site perimeter are the subject of tree preservation orders. Proposed development at the

site will retain these trees, respecting their root protection areas.

The requirement to provide a Landscape and Visual Appraisal or a Landscape and Visual Impact Assessment as currently worded applies to all proposed development. This is considered excessive and should only be required for major developments or in sensitive areas.

22.0 Policy NE15 Special Trees, Important Hedgerows and Ancient Woodlands

Do you support the approach in policy NE15 – special trees, important hedgerows and ancient woodlands? If no, please explain how this policy should be amended?

Criteria i) is considered to go beyond what is set out in the NPPF, with regard to the reference to exceptional circumstances and as such is not consistent with national policy. This should be removed. The draft policy should be amended as follows:

The removal of protected trees, groups of trees, woodland or hedgerows will only be permitted ~~in exceptional circumstances and~~ in accordance with the relevant legislation, policy and good practice recommendations and where it has been demonstrated to be unavoidable. Where protected trees are subject to felling, a replacement of an appropriate number, species and size in an appropriate location will be required.

It is noted that a minimum 15m buffer requirement for ancient woodland and veteran trees appropriately reflects national guidance and is therefore supported, but there would be concern if in practice significantly larger buffer areas are requested in the absence of specific justification as this would have significant implications for the efficient use of land and overall housing delivery.

23.0 Policy NE16 Nutrient Neutrality Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites of the Solent and The River Itchen

Do you support the approach in policy NE16 – Nutrient Neutrality Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites of the Solent and The River Itchen? If no, please explain how this policy should be amended?

It is noted from paragraph 7.113 that the council has received guidance from Natural England in 2022, affecting the way the council has to assess new overnight development across the whole district in terms of calculating the impact caused by the wastewater they produce. The policy has now also been revised from the regulation 18 policy to include 'nutrient budgets' and 'nutrient credits' as a means to offset developer impacts.

It is worth noting that the Government has sought to address nutrient neutrality through the Levelling Up and Regeneration Act (LURA), to require wastewater treatment works to be upgraded to the highest technically achievable limits. Policy wording and supporting text should include reference to the LURAI, which will supersede the requirement for individual schemes to demonstrate nutrient neutrality from 2030.

Additionally, it should be recognised that there is significant uncertainty surrounding the methods available to achieve nutrient neutrality. While there are numerous

strategic solutions, the policy fails to mention that the Local Planning Authority can play a vital role in facilitating these solutions, to support their growth strategy.

The regulation 19 policy introduces a specific requirement about making positive contributions to the Local Nature Recovery Network within criterion iii, which was not previously included with the regulation 18 policy. However, there is nothing within the supporting text to explain what is required. Further explanation is needed to guide development in the district.

Many of the larger brownfield sites which the Council is seeking to prioritise delivery of are affected by nutrient neutrality issues, including both nitrates and phosphates. Such sites are less likely to be able to easily achieve nutrient neutrality, particularly in light of the 2030 date for upgrading of wastewater treatment plants. Consideration should be therefore given to a more balanced approach to the location of development which allows greenfield sites which are less constrained by nutrient neutrality issues to come forward prior to 2030. One such site is the draft allocation at Land at Mill Lane, Wickham (Policy WK5). Additionally, we propose expanding this draft allocation to include site WI06, located at the junction of Mill Lane, Wickham. This site was included in a previously suggested masterplan and is not subject to nutrient neutrality issues. Incorporating it could significantly increase the total number of units from 40 to approximately 100.

THE HISTORIC ENVIRONMENT

24.0 Policy HE4 Non-designated Heritage Assets

Do you support the approach in policy HE4 – Non-designated heritage assets? If no, please explain how this policy should be amended?

Whilst Bloor Homes supports the thrust of the policy, it should be amended to read *“Where development proposals would result in harm to the significance of non-designated heritage assets, in accordance with the NPPF, a balanced judgment will be made, having regard to the scale of the harm or loss and the significance of the asset”* to ensure that it is wholly compliant with paragraph 209 of the NPPF.

Alternatively, given this amendment would essentially repeat the requirements of the NPPF, this policy should be removed.

25.0 Policy HE5 Protecting the Significance of Heritage Assets (designated and non-designated heritage assets) and Mitigating Unavoidable Harm

Do you support the approach in policy HE5 – Protecting the Significance of Heritage Assets (designated and non-designated heritage assets) and Mitigating Unavoidable Harm? If no, please explain how this policy should be amended?

The first paragraph of the policy would benefit from being worded in a way which reflects the actual tests in the NPPF. Strictly, the circumstances in which the LPA will permit loss of whole or part of a building should not be because it is loss per se, but because the tests for substantial/less than substantial harm etc are met.

The recording element of HE5 is also considered to be excessive, as not all cases where significance is harmed by consented proposals will merit recording, which is currently the implication of the text.

Suggested revised text for HE5:

The local planning authority will not permit the loss of the whole or part of a heritage asset unless the relevant tests set out in Policies HE3 and HE4, which reflect those in the NPPF, are met and that all reasonable steps (such as legal agreement) have been taken to ensure the new development will proceed after the loss has occurred.

In cases where the significance of any heritage asset is harmed or lost (wholly or in part), the local planning authority may require an appropriate programme of recording to advance understanding. This recording should be carried out using appropriate expertise, be proportionate and be made publicly accessible. As a minimum, it should be provided to the local authority for inclusion in the Winchester Historic Environment Record.

26.0 Policy HE7 Non-designated Archaeological Assets

Do you support the approach in policy HE7 – Non-designated Archaeological Assets? If no, please explain how this policy should be amended?

The policy wording repeats itself: the ‘Where development affecting archaeological assets...’ section is in there twice.

27.0 Policy HE11 Demolition in Conservation Areas

Do you support the approach in policy HE11 – Demolition in Conservation Areas? If no, please explain how this policy should be amended?

Paragraph 8.34, p. 200: The use of 'exceptional circumstances' here is overly restrictive and does not relate to the circumstances in which the loss of unlisted buildings in conservation areas would actually be permitted. The more relevant consideration is whether the loss will result in harm to the character and appearance of the conservation through a positively contributing building (per NPPF, para. 213). The demonstration that a building is beyond repair and incapable of beneficial use is a consideration, not the only determinant.

Suggested revised text for 8.34:

...Consent for demolition of such buildings will be granted only where any harm arising to the character and appearance of the conservation area is considered acceptable in line with the relevant tests set out in Policy HE3 for designated heritage assets.

In turn, this should be reflected in the wording for Policy HE11, we'd suggest adding a fourth bullet point:

iv. ...or where any harm arising to the character and appearance of the conservation area is considered acceptable in line with the relevant tests set out in Policy HE3 for designated heritage assets.

HOMES FOR ALL

28.0 Strategic Policy H1 Housing Provision

Do you support the approach in policy H1 – Housing Provision? If no, please explain how this policy should be amended?

While Bloor Homes supports the approach set out in Strategic Policy H1 in principle it disagrees with more detailed aspects of the policy and the veracity of the evidence base.

Housing Need

Bloor Homes agrees with the principle of supporting the delivery of new housing across the three identified spatial areas: Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Area. It is emphasised that all three spatial areas are critical to delivering the district's growth requirements.

In stipulating a target for new homes in each spatial location however, it is highlighted that any such target must not be judged to be a maximum, but a minimum. It should be made clear in Policy H1 that these are minimum targets and should only be seen as a starting point. To ensure that the draft plan is flexible and positively prepared to cover the whole of the plan period, the realistic need for homes above these targets should be acknowledged within the policy wording.

NPPF paragraph 11 a) states that *“plans should seek to meet the development needs of their area”* with b) stating *“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”*.

Furthermore, paragraph 61 states that:

“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. There may be exceptional circumstances, including relating to the particular demographic characteristics of an area²⁵ 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 for²⁶.”

Paragraph 67 of the NPPF continues *“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. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.”*

The NPPG is clear that the standard methodology set out within it provides a “minimum” figure of housing need (ID: 2a-002-20190220). It is a “starting point” (ID: 2a-010-20201216). This particularly applies in respect of the need to contribute to meeting the Partnership for South Hampshire strategy.

Strategic Policy H1 is unsound on the basis that it fails to plan positively to fully meet the evidenced scale of local housing need – in particular the unmet needs arising in South Hampshire.

The duty to co-operate is a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis, so that strategic, cross-boundary matters are dealt with effectively in individual Local Plans.

In a Written Ministerial Statement dated 30 July 2024, Angela Rayner as new Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government confirmed the continued operation of the duty to cooperate in the current planning system in order to ensure that the right engagement is occurring on the sharing of unmet housing need and other strategic issues where plans are being progressed in the short-term. The statements regarding housing delivery in the Written Ministerial Statement express a strong policy direction which should be accorded great importance i.e. to deliver a greater number of homes where they are needed

In an accompanying letter to local authority leaders and chief executives on the same date as the Ministerial Statement, it was also highlighted that the Government's intention is that local authorities will be expected to make every effort to allocate land in plans in line with their housing need as per a new standard method.

It clarifies that for local plans at examination this means allowing them to continue, although where there is a significant gap between the plan and the new local housing need figure, there is an expectation that authorities begin a plan immediately in the new system.

As per paragraphs 11b) and 27 of the current version of the NPPF, December 2023, 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 (as established through statements of common ground). In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.

The consultation on a revised standard method and revised NPPF proposes big changes so that the national agenda to provide substantially more homes is achieved. Whilst the statements of common ground that Winchester City Council has progressed in summer 2024 mostly pre-date the 30 July announcements, it is notable that Havant Borough Council has stated in the interim statement of common ground dated August 2024 that it *“reserves the right to raise concerns regarding the soundness and legal compliance of the plan through the consultation and examination. This would include amongst other matters consideration of whether the Duty to Cooperate can be considered to be met.”* Havant Borough Council's statement implies that Winchester City Council has failed to plan positively in respect of unmet need, particularly in view of the very high level of unmet housing need in Havant Borough at the date of the agreement. Assuming the forthcoming introduction of the new standard method these already high levels of unmet need are to set to increase substantially.

Furthermore, the statement of common ground with Portsmouth City Council dated August 2024 also suggests that the issue of unmet needs is not fully addressed although it does not comment on whether the lack of a solution is potentially a matter that will raise concern in terms of legal compliance and soundness.

While paragraph 9.16 of the Regulation 19 Plan claims to incorporate an unmet needs allowance *“in the spirit of co-operation required by government policy”*, the scale of this allowance is insufficient given the known scale of unmet need and expected increase to housing numbers being proposed through a revised standard method.

Moreover, the language in paragraph 9.17 referring to “ongoing unmet need” and planning “in the long-term” implies a lack of urgency in addressing critical issues that are at the heart of the duty to co-operate.

Examining Winchester City Council’s housing trajectory, as detailed on page 218 and in paragraph 9.23 of the draft plan, it becomes evident that the overall trend for housing provision in the Winchester district is downward.

Considering the current existing unmet need in South Hampshire (particularly for Havant and Portsmouth), and the prospect of increased housing requirements being introduced for Winchester and adjoining authorities (arising from the revised standard method), it appears unjustified to phase new greenfield allocations for the latter half of the plan period.

To ensure an upward delivery trend across the plan period and beyond and to deliver a greater number of homes where they are needed - and to maximise opportunities to meet the unmet need in South Hampshire - it is crucial to include additional allocations in this plan that would support and sustain higher levels of housing completions.

According to paragraph 9.15 and Table H1, the housing need for the district has been calculated at 13,565 dwellings through the local plan period until 2040, based on the latest standard method calculation from March 2024.

However, as acknowledged in paragraph 9.14, ‘the Government has made it very clear that it wants to boost the supply and delivery of new homes, and it expects the ‘Standard Method’ to be used as a starting point to set the housing requirement for the district.’ Notably, the current housing requirement has decreased from the Regulation 18 stage, where the minimum requirement was set at 736 dwellings annually, totalling 14,178. Furthermore, where previously a buffer for standard method changes and to help contribute to the PfSH shortfall had been allowed for in the total housing need figure, there is no longer any reference to the former.

Given that the standard method serves as a starting point and the proposed housing requirement for Winchester under the proposed standard method (consultation now closed) is 1,099, the proposed decrease since Regulation 18 to 13,565 does not provide a sound or robust foundation for the local plan.

The situation is exacerbated by clear affordability pressures within the district, stemming from a constrained housing market. The Strategic Housing Market Assessment (SHMA) from July 2024, reveals that median rental prices in the district (as of September 2023) were higher across all types of housing when compared to all other geographies assessed. In addition, critically, the median house price was greater in Winchester than in wider comparable regions. This underscores the

necessity for the local plan to be planning for a greater housing requirement, rather than a reduction, and also a level above the current standard method figure.

Paragraph 9.15 notes that *‘within southern Hampshire there are a number of authorities that appear unable to meet their Standard Method housing need in full and the Partnership for South Hampshire (PfSH) has developed a Spatial Position Statement to address this.’* The December 2023 PfSH Position Statement outlined that it *‘has taken an approach which is flexible and can be adjusted in future years should these proposals in this latest Government consultation come into practice, and the policy framework within which PfSH operates changes significantly. In overall terms, whilst the precise targets may change, there is still a strong need for new homes. It is important to retain flexibility on the specific targets whilst continuing to plan positively for the overall needs.’*

While the position statement predates the updated NPPF consultation and the proposed introduction of the new standard method, there is a clear expectation for flexibility in the preferred spatial approach, which can be adjusted to accommodate the outcome of the Government consultation. In this regard, the proposed standard method local housing needs, would give rises to significant increase in housing required for adjacent PfSH authorities.

Paragraph 9.16 of the emerging plan notes that *‘an unmet needs allowance is provided in the spirit of cooperation required by government policy, to help contribute towards the PfSH shortfall.’* According to Table H2, this unmet need allowance for neighbouring authorities stands at 1,900. Although this marks a slight increase from the Regulation 18 stage, this has been offset by the lower standard method housing need figure and the removal of any buffer for standard method changes. Additionally, there is a lack of evidence regarding how this unmet need figure was calculated.

Given existing unmet need (and the significant proposed increases in housing requirements for surrounding PfSH authorities based on the emerging standard method), it is evident that the current allowance falls significantly short of what is necessary to support a sound local plan.

The plan should proactively seek to address the unmet housing needs by establishing a higher housing target, which reflects the positive opportunities and capacity within the district. Furthermore, it should allocate all deliverable sites in sustainable locations, in accordance with the settlement hierarchy and opportunities to access services, facilities and sustainable travel options. This should include expanding the draft allocation for Land at Mill Lane, Wickham (Policy WK5) to include site WI06, increasing the total number of units from 40 to around 100.

This proposed expansion is justified, considering the district’s capacity to address the (growing) unmet needs within the Partnership for South Hampshire (PfSH) area as part of its duty to cooperate, while also allowing greater flexibility in the event of any non-delivery on existing allocated sites. This approach would ensure that the policy is positively prepared and remains effective over its period.

Table 1 within the PfSH Spatial Position Statement (December 2023) shows there is a shortfall of just under 11,800 homes across the South Hampshire sub region. It should be recognised that this level of unmet need is likely to increase between 35,000 to 40,000 should the proposed amendments to the NPPF and Standard Method be adopted.

Plan period

Bloor Homes contests the Council's decision to establish a plan period beginning in 2020, which precedes the submission of the local plan for examination by over four years. The Council's reason for this is set out in paragraph 2.3 of Housing Topic Paper; that this is expressly to include high levels of recent delivery to be taken into account in this local plan.

Further, Paragraph 2.4 suggests that this approach is necessary because the NPPF makes no specific provision for past over supply to be taken into account. The Council is concerned about this oversupply becoming "lost" in the planning process.

However, this approach fundamentally misinterprets the standard method, which incorporates past supply via an affordability uplift to determine future housing needs. The increase in housing delivery, to a degree, takes into account past over supply in that it will have increased supply in the market, thereby potentially limiting increases in housing prices in Winchester and lessening the assessed housing need determined under the standard method.

Local plans are meant to look forward at what needs to be delivered with past delivery being taken into account through the standard method. This is clear from paragraph 2a-005 notes that when setting the baseline for the standard method the current year is used as the starting point for calculating growth.

Additionally, the standard method requires that the affordability adjustment be based on most recent data, which in this case it is the median affordability ratio for 2023, published in March 2024. This adjustment is to reflect the price signals in the market and ensure that housing needs are responding to these signals which suggests that the starting point for any plan should be the year to which the affordability ratio relates.

Consequently, commencing the plan period in 2020 is neither logical nor consistent with national policy; it should instead begin in 2024, the year in which the assessment was calculated and also to allow for delays to adoption.

The Council claims in paragraph 2.4 of the Housing Topic Paper that a 2020 start date is essential to maintain a 20-year plan period. However, national policy does not mandate that councils maintain such a period, nor does it prohibit the Council from establishing a 20-year timeframe commencing in 2024 if it deems it necessary for the effectiveness of the plan or a short time period of at least 15 years. Therefore, the council's intention to maintain a 20-year plan period cannot justify starting the plan in 2020. To ensure consistency with national policy, the Council should revise the plan period to start in 2024.

29.0 Policy H2 Housing Phasing and Supply

Do you support the approach in policy H2 – Housing Phasing and Supply? If no, please explain how this policy should be amended?

Bloor Homes do not support the phasing of housing delivery throughout the plan period. The draft policy wording currently states that *'phasing will be applied to new greenfield housing sites allocated by this Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory.'* Bloor Homes considers this approach to be overly restrictive and fails to apply a flexible methodology that would safeguard the district's future housing provision against

unforeseeable shortfalls or downturns in the market arising from ongoing economic issues.

It is clear from Winchester City Council's trajectory as set out on page 218 and the text at paragraph 9.23 of the draft plan, that the general planned trend for housing provision in Winchester district is downward. In the face of the current stated level of unmet need in South Hampshire (particularly for Havant and Portsmouth), and the prospect of increased housing requirements being introduced under the revised standard method, the phasing of the new greenfield allocations in Winchester District into the second half of the plan period is unnecessary. To ensure an upward delivery trend across the plan period and beyond and to deliver a greater number of homes where they are needed - and to maximise opportunities to meet the unmet need in South Hampshire - provision should be made in this plan for additional strategic allocations which would promote and maintain higher levels of dwelling completions.

According to paragraph 82d) of the National Planning Policy Framework (NPPF), *"planning policies should be flexible enough to accommodate needs not anticipated in the plan"*. This is considered particularly applicable to the growth requirements and potential of Wickham. Equally, NPPF paragraph 11 highlights *that 'plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change.'* Accordingly, introduction of phasing will constrain housing delivery, and runs counter to the NPPF requirement for in-built flexibility within local plans. In being flexible and responsive to changing market circumstances, prioritising the development of previously developed land runs the risk of restricting the housing pipeline, further exacerbating the affordability housing challenge in the district.

Consequently, the policy wording should be revised to incorporate greater flexibility. and to not exclude other greenfield or other non-allocated deliverable sites from coming forward earlier in the plan period. This would also support the sustainability of settlements which would be frustrated if development is artificially held back.

There is no justification for holding back sustainable sites for development, and delivering affordable homes, in an area of acute affordability issues. All sustainable opportunities for the provision of housing in the district should be taken to positively respond to the significant challenge.

Additionally, the council's reliance on the delivery of higher annual housing numbers during the earlier part of the plan period is based on the delivery of a large number of outstanding planning permissions and windfall developments, many of which will be on brownfield sites. There is evidence from the current local plan (Central Winchester Regeneration Area and Station Approach Regeneration Area) that brownfield sites do not deliver when expected.

30.0 Strategic Policy H3 Spatial Housing Distribution

Do you support the approach in policy H3 – Housing Distribution? If no, please explain how this policy should be amended?

Whilst Bloor Homes agrees with the principle of supporting the delivery of new housing across the three identified spatial areas: Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Area, it is considered that there is scope to provide additional growth in the Market Towns and Rural Areas, including Wickham, to both support the continued sustainability of settlements in

these areas but also to provide for the identified shortfall in provision arising in the PfSH area.

In light of this substantial increase in the identified shortfall in housing in the PfSH area, the housing requirement and distribution for Winchester District should provide additional flexibility, acknowledging established linkages with neighbouring authorities.

Bloor Homes acknowledges that Winchester Town is the highest tier in the settlement hierarchy and therefore additional growth should be provided there, with the South Hampshire Urban Areas continuing to provide growth at the consented major development areas.

However, there needs to be a balance between what is provided in these areas and what is provided elsewhere in the district.

Paragraph 9.26 identifies that there is limited scope for expansion of the South Hampshire Urban Area with paragraph 9.27 recognising that whilst Winchester Town is the most sustainable settlement in the district, it is heavily constrained, leading to the need to identify new allocations alongside some existing allocations that are to be carried forward. Given these constraints, there is an opportunity for any additional growth needed to be accommodated at the smaller but sustainable settlements such as Wickham. This is in line with the Vision which recognises that market towns and large villages need an appropriate level of growth to continue to thrive.

A mixed approach to site allocations is necessary to achieve sustainable development and deliver the development required at the locations where it is most needed. This is consistent with the NPPF which identifies the need to increase the number of medium sized sites coming forward (paragraph 70).

There is an opportunity for further housing need to be accommodated in Wickham through the extension of draft Policy WK5 Land at Mill Lane to include land to the north, which could potentially provide around an additional 60 homes.

31.0 Strategic Policy H5 Meeting Housing Needs

Do you support the approach in policy H5 – Meeting Housing Needs? If no, please explain how this policy should be amended?

Bloor Homes supports the principle of the provision of a range of housing types and tenures, and recognises the importance of meeting housing need in accordance with most recent evidence. It is considered a range of housing types and tenures can be delivered as part of the Land at Mill Lane, Wickham site (Draft Policy WK5). However, there is the potential to expand the draft allocation to provide approximately 60 additional homes on land north of the proposed allocation. This would enable an increase in the range of housing types and tenures to be delivered on site, making most efficient use of land and increasing the affordable housing offer.

In respect of dwelling size and tenure, Bloor consider the criteria set out to be overly specific, and lacking flexibility. The mix of units to be provided on any site should be based on the latest SHMA and reflect local characteristics. Consideration should also be given to the implications of these criteria for the efficient use of land, their appropriateness for each site and the market for the homes to be provided.

As previously highlighted in our Regulation 18 representations concerning Strategic Policy H5, the proposed requirement for at least 6% self-build and custom build properties is introducing further technical challenges to an already complex planning system, which will ultimately hinder the delivery of much needed homes and facilities. The health and safety complications of delivering such properties should not be underestimated and there is limited evidence that self / custom build properties are working in practice. The reality is that the additional burden such properties place on developments is significant, placing additional management time / cost / resource on projects with potentially no customer interest or uptake at the end of the process. The existence of a register is not sufficient evidence to justify such a need exists as it is simply a list with no criteria-based requirement.

The section on acceptable and adaptable homes should be retitled 'accessible and adaptable homes'. Bloor Homes consider that the policy needs to allow sufficient flexibility to factor in site circumstances for example topography etc. as this could affect levels, requiring retaining structures etc. As currently drafted it is insufficiently flexibly to reflect individual site circumstances. Furthermore, it is Bloor's experience that M4(3) properties are not of great interest to prospective purchasers and are more expensive to build.

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

Affordable Housing

Do you support the approach in policy H6 – Affordable Housing? If no, please explain how this policy should be amended?

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

However, we consider that this draft allocation should be expanded to include approximately 60 additional units on land to the north of the allocation, which has previously been promoted. This amendment would increase the total number of units to around 100, with up to 40 provided as affordable housing.

It is also noted that for market-led housing schemes, targets are provided for affordable housing provision based on 'low cost home ownership' and 'social rent or affordable rent'. To ensure that the right type of affordable homes is delivered in the right locations, such targets should be applied flexibly based on local need and site-specific circumstances. This will also ensure that the local plan is responsive to potential shifts or changes in local affordable housing need over the duration of the plan period, as referenced at paragraph 9.42.

WINCHESTER SITE ALLOCATIONS

32.0 Policy W2 Sir John Moore Barracks

Do you support the approach in policy W2– Sir John Moore Barracks? If no, please explain how this policy should be amended?

It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), scores better than Sir John Moore Barracks (refer to Appendix F, pages 624-626) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024-1026).

Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, also outperforms the Sir John Moore Barracks (refer to Appendix F, pages 624-626) in terms of sustainability (refer to Appendix F, pages 1033-1035).

We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to around 100.

33.0 Policy W7 Central Winchester Regeneration

Do you support the approach in policy W7– Central Winchester Regeneration Area? If no, please explain how this policy should be amended?

The Central Winchester Regeneration Area is an existing Local Plan allocation (WIN4) that is proposed to be carried forward. It is noted that this site was also allocated prior to the current Local Plan as Policy W.2 – Broadway/Friarsgate (Silver Hill) within the Local Plan Review (adopted 2006). It has still not been delivered.

As a brownfield site it is not expected to deliver the same level of affordable housing as greenfield sites. Given the priority to deliver affordable housing, there is a disconnect between the reliance placed on brownfield sites, including those that have not delivered any housing to date, and greenfield sites that are more readily delivered and can provide higher levels of affordable housing. Consequently, the draft strategy needs to be altered so that there is a better balance between greenfield and brownfield.

There are opportunities for growth beyond Winchester Town on sites such as Mill Lane, Wickham, which are not constrained, and which could readily be brought forward during the plan period.

It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), performs better than Central Winchester Regeneration site (refer to Appendix F, Site Assessment, pages 1148-1150) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024-1026).

Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, performs similarly to the Central Winchester Regeneration site (refer to Appendix F, Site Assessment, pages 1148-

1150) in terms of sustainability (refer to Appendix F, pages 1033-1035), despite it being located in Winchester itself.

We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to 100 and significantly elevate the number of affordable housing units from 16 to 40 on the site.

34.0 Policy W8 Station Approach Regeneration Area

Do you support the approach in policy W8– Station Approach Regeneration Area? If no, please explain how this policy should be amended?

The Station Approach Regeneration Area is an existing Local Plan allocation (WIN5, 6 and 7) that is proposed to be carried forward as it has not been delivered. The plan identifies at paragraph 12.82 (as it did at Regulation 18 stage) that the land is in multiple land ownerships and that there are differing programmes and priorities that make it likely that the site will be brought forward in stages over the plan period. Given this, it is questioned how deliverable this site actually is.

As with other brownfield sites, the level of affordable housing to be delivered would be lower than that of a greenfield site. Given the local priority to deliver affordable housing and the issues associated with bringing forward this site, consideration should be given to providing additional development elsewhere on greenfield sites.

It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), scores reasonably similarly to the Station Approach Regeneration Area site (refer to Appendix F, Site Assessment Proforma, page 1151-1153) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024-1026) and is under single ownership.

Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, also performs broadly similarly the Station Approach Regeneration Area site (refer to Appendix F, Site Assessment Proforma, page 1151-1153) in terms of sustainability within the Integrated Impact Assessment Report (refer to Appendix F, pages 1033-1035). This site is in single ownership and more likely to be deliverable than the Station Approach Regeneration Area site and can provide 40% affordable housing, as it is greenfield, as opposed to the 30% provided at Station Approach Regeneration site.

We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to 100 and significantly elevate the number of affordable housing units from 16 to 40 on the site.

THE MARKET TOWNS AND RURAL AREA

35.0 Policy BW3 Tollgate Sawmill

Do you support the approach in policy BW3– Tollgate Sawmill? If no, please explain how this policy should be amended?

The Tollgate Mill site is an existing local plan allocation that is proposed to be carried forward as it has not been delivered. The plan indicates that it is in existing commercial use. To date there is no indication from the planning applications register of any residential development activity on this site and it is therefore questioned how deliverable this site is.

It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), scores better than the Tollgate Sawmill site (refer to Appendix F, Site Assessment Proforma, pages 50-52) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024-1026) and is under single ownership.

Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, also outperforms the Tollgate Sawmill site (refer to Appendix F, Site Assessment Proforma, pages 50-52) from in terms of sustainability within the Integrated Impact Assessment Report (refer to Appendix F, pages 1033-1035). This Mill Lane site is in single ownership and more likely to be deliverable than the BW3 Tollgate Sawmill site and can provide up to 40% affordable housing.

We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to around 100 and significantly elevate the number of affordable housing units from 16 to up to 40 on the site.

36.0 Policy CC1 Clayfield Park

Do you support the approach in policy CC1– Clayfield Park? If no, please explain how this policy should be amended?

Clayfield Park is an existing local plan allocation which has not been delivered. It is noted that there is a recent consent (24/01557/FUL) for a single storey extension to an existing workshop on a small part of site (granted in August 2024), which is understood to be occupied by Clayfield Caravans. Given the recent planning consent, the nature of the existing use and the size of the site, it is questioned whether there is potential for a suitable alternative site for the existing business to relocate to, to allow for redevelopment of the site.

The Integrated Impact Assessment (published July 2024) identifies significant negative scores in relation to sustainable economic growth (IIA8), biodiversity and geodiversity (IIA9), natural resources (IIA12) and water resources (IIA13) with minor negative effects likely in relation to climate change mitigation (IIA1), transport and air quality (IIA2) and access to services, facilities and jobs (IIA7) (refer to Appendix F, Site Assessment Proformas, pages 148-150).

It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), scores better than the Clayfield Park site (refer to Appendix F, Site Assessment Proformas, pages 148-150) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024-1026).

Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, also outperforms the Clayfield Park site (refer to Appendix F, Site Assessment Proformas, pages 148-150) in terms of sustainability within the Integrated Impact Assessment Report (refer to Appendix F, pages 1033-1035). This site is in single ownership and more likely to be deliverable than the Clayfield Park site and can provide 40% affordable housing.

We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to around 100 and significantly elevate the number of affordable housing units from 16 to up to 40 on the site.

37.0 Policy WK5 Land at Mill Lane

Do you support the approach in policy WK5– Land at Mill Lane? If no, please explain how this policy should be amended?

Bloor Homes broadly supports draft policy WK5. However, it has a number of concerns regarding elements of the policy.

Draft Policy WK5 currently states that *'The development is phased for the latter part of the Local Plan period and permission for housing development will not be granted before 2030'*.

Bloor Homes considers this approach to be overly restrictive and fails to apply a flexible methodology that would safeguard the district's future housing provision against unforeseeable shortfalls or downturns in the market arising from ongoing economic issues.

It is clear from Winchester City Council's trajectory as set out on page 218 and the text at paragraph 9.23 of the draft plan, that the general planned trend for housing provision in Winchester district is downward. In the face of the current stated level of unmet need in South Hampshire (particularly for Havant and Portsmouth), and the prospect of increased housing requirements being introduced under the revised standard method, the phasing of this policy and indeed the other greenfield allocations in Winchester District into the second half of the plan period is unnecessary.

According to paragraph 82d) of the National Planning Policy Framework (NPPF), *"planning policies should be flexible enough to accommodate needs not anticipated in the plan"*. This is considered particularly applicable to the growth requirements and potential of Wickham. Equally, NPPF paragraph 11 highlights *that 'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.'* Accordingly, introduction of phasing will constrain housing delivery, and runs counter to the NPPF requirement for in-built flexibility within local plans. In being flexible and responsive to changing market circumstances, prioritising the development of previously developed land runs the risk of restricting the housing pipeline, further exacerbating the affordability housing challenge in the district.

Consequently, the policy wording should be revised to incorporate greater flexibility and to not exclude this site from coming forward earlier as the site can be delivered within the first five years of the plan period and there is no reason to prevent this. This would also support the sustainability of the settlement which would be frustrated if development is artificially held back.

Additionally, the council's reliance on the delivery of higher annual housing numbers during the earlier part of the plan period is based on the delivery of a large number of outstanding planning permissions and windfall developments, many of which will be on brownfield sites. There is evidence from the current local plan (Central Winchester Regeneration Area and Station Approach Regeneration Area) that brownfield sites do not deliver when expected.

We do not consider criteria v is necessary given that criteria ii seeks to ensure site is well connected to surrounding area by sustainable transport modes. Criteria v should be removed.

In respect of criteria ix, we consider wording should be amended to include the following text:

“Unless modelling/ evidence demonstrates otherwise.”

Detailed modelling work will need to be undertaken in relation to surface water drainage to confirm the most appropriate strategy for dealing with surface water and therefore an element of flexibility is required within the policy to allow alternative strategies to be considered.

With regards to criteria xii there is no identified concern around wastewater treatment/sewerage infrastructure set out in the Updated Infrastructure Delivery Plan, August 2024 in respect of this site; therefore, this should not be a reason not to bring the site forward earlier in the plan period. Furthermore, it is the responsibility of the statutory undertaker to service sites with planning consent.

Regarding criteria xiii, the wording is ambiguous. There is nothing in the supporting text to identify what supporting infrastructure is needed to make the development acceptable in planning terms.

There is an opportunity for the site to be extended to the north to include WI06. The addition of this land would enable the draft allocation for Land at Mill Lane, Wickham (Policy WK5) to be expanded, increasing the total number of units on the site from 40 to around 100.

The current need for affordable housing within the June 2024 Strategic Housing Market Assessment is 1,073 households (63 annually). By expanding WK5 to include WI06, the number of affordable housing units would be significantly elevated from 16 to up to 40 on the site, helping to address the acute affordability issue experienced in Winchester.

The Integrated Impact Assessment Report (refer to Appendix F, pages 1033-1035) identifies that WI06 is equally and in some cases more sustainable than a number of sites that have been allocated. We therefore see no reason for holding back this sustainable site for development. Every sustainable opportunity in the district should be taken to positively respond to the significant challenge of providing sufficient housing, particularly where sites are located where they can contribute to the unmet

need in the Partnership for South Hampshire area.

The submitted Vision Document (enclosed) demonstrates that there are limited constraints affecting the site (the draft allocation and WI06). There are no national environmental designations on the site, with the Wickham Conservation Area some 400m south of the proposed allocation and further from the proposed extension to it.

Existing woodland around the edge of the site and individual trees around the site perimeter are the subject of tree preservation orders. Proposed development at the site will seek to retain these trees as far as practically possible, respecting their root protection areas.

There is an existing water main on site, which can be incorporated into the development proposal.

The site is a gateway to both Wickham and the adjacent South Downs National Park, and in response the northern part of the site will be retained as an open area, with the potential for new copse and tree planting to act as a landscape buffer along the northern boundary of the residential development.

The site falls within the Hampshire County Council (HCC) Mineral Consultation Area but this is not considered to be a constraint to development. It is noted that in response to an application for 120 dwellings adjacent to the site, which was approved on 24 June 2019 (ref 17/02615/FUL), HCC stated that the overlap of the minerals and waste consultation area was minimal and raised no objection.

Access to the site can be provided from Mill Lane and Bloor Homes will be seeking to provide pedestrian access along Mill Lane to the southern boundary of the site. The site is able to link into the network of public rights of way, including to the nearby South Downs National Park.

Key opportunities

The site provides a range of opportunities, details of which are set out in the attached Vision document, but which can be summarised as:

- Provision of around 100 new homes, including affordable homes to support local services and facilities and sustain the town
- Provision of a variety of house types and sizes
- Open spaces, including play areas, would be provided within the development with a larger open area potentially to the north of the development, adjacent to the South Downs National Park
- Provision of appropriate supporting infrastructure including parking, EV charging, drainage and landscaping
- Potential to provide new allotments if housing numbers increase
- Potential to provide additional car parking for the adjacent doctor's surgery, which is an opportunity unique to this site given its relationship with the Surgery if housing numbers increase
- The site is located on the edge of Wickham, a higher tier sustainable settlement, within which growth is supported
- The site is located in close proximity (5-10 min walk, well below the 20 min neighbourhood concept) to a wide range of services including shops, doctor's surgery, the local primary school and community centre and is opposite the proposed recreation ground which Wickham Parish Council are bringing forward. All of these facilities are accessible on foot or by cycle
- Access can be provided off Mill Lane

- There are opportunities to connect into the wider pedestrian and cycle network
- There could be shared opportunities for provision of the recreational ground opposite, which the Town Council has aspirations to deliver.

How the site fits with the plan vision and key objectives

The Mill Lane site provides an opportunity to provide modest growth on the edge of a Larger Rural Settlement, helping to meet the housing and other needs of the settlement and contributing to its future sustainability. Its relatively unconstrained location assists in ensuring that the identity and historic assets of Wickham can be retained, with a carefully considered design ensuring that the rural character of this edge of Wickham can be maintained and enhanced.

Development at Mill Lane can be designed to take account of wider sustainability issues, ensuring that the layout and design of the development addresses issues such as climate change and accessibility to green spaces and local services.

Carbon neutrality, biodiversity and the natural environment

Bloor Homes is committed to making best and most efficient use of the Mill Lane site, providing energy efficient homes within a high quality sustainable design that takes account of and integrates with its surroundings.

Bloor Homes will seek to provide at least 10% Biodiversity Net Gain through the development of an integrated landscape and ecological strategy for the site (incorporating sustainable drainage). The design would also take account of the site's proximity to the South Downs National Park.

As the site is currently in agricultural use, there is potential to provide nutrient neutrality measures through the use of part of the site as public open space. Should additional mitigation be required, a variety of options are available to ensure the development is nutrient neutral.

High quality well-designed places and Living well

Land at Mill Lane is within 20-minutes walking distance of the market square, primary school, health centre, community centre and playing fields, providing opportunities to access facilities and services on foot and by cycle. It is also located immediately opposite the proposed recreation ground.

From the market square there are regular bus services to Winchester and Fareham. The local plan should be looking to identify development opportunities such as is afforded by this site to create accessible neighbourhoods within all of the settlements in the district.

The site is also well located to provide access to outdoor recreation and the natural environment through the integration of public open space within the development, including a large area to the north, and through its location close to South Downs National Park and the Meon Valley Trail.

Homes for All

Bloor Homes is committed to providing high quality housing, with a mix of types and sizes to be provided, including affordable housing to meet the needs of local residents.

The site has the potential to deliver up to 40% affordable housing as set out within draft policy. The site is not brownfield and lies outside the catchment of the River Itchen SAC, hence the level of affordable housing that could be provided would be greater than that of those sites which fall within that catchment.

The accompanying Vision Document provides more detailed information on the benefits of the site and how the site can successfully deliver circa 100 dwellings. It demonstrates that there are no technical constraints to development and with appropriate planting, the development can be assimilated into the landscape. As a suitable site for development (as confirmed by the SHELAA, 2021) the plan should allocate the larger Mill Lane site for new homes to meet local needs and unmet needs in the PfSH area.

Mill Lane assessment in the Integrated Impact Assessment (WI02 and WI06)

Winchester City Council commissioned LUC in May 2022 and 2024 to carry out an Integrated Impact Assessment (IIA), and Habitats Regulations Assessment (HRA) of the Regulation 19 Winchester District Proposed Submission Local Plan. Appendix F of the IIA presents the detailed site assessment proformas for each of the site options appraised.

The detailed assessment for the draft allocation is set out on pages 1024-1025 of the IIA and below.

IIA Objective	Score
IIA1: climate change mitigation	Minor positive (+)
IIA2: travel and air quality	Minor positive (+)
IIA4: health and wellbeing	Minor positive (+)
IIA7: services and facilities	Minor positive (+)
IIA8: economy	Negligible uncertain (0?)
IIA9: biodiversity and geodiversity	Significant negative (--)
IIA10: landscape	Negligible uncertain (0?)
IIA11: historic environment	Negligible uncertain (0?)
IIA12: natural resources	Significant negative (--)
IIA13: water resources	Negligible (0)
IIA14: flood risk	Negligible (0)

The detailed assessment for WI06 is set out on pages 1033-1035 of the IIA and below. It can be seen that with the exception of landscape, all of criteria have been similarly assessed as compared with the draft allocation. The justification for the lower scoring contained within the report is that “The site has medium or higher overall landscape sensitivity.” This is not, however, explained.

IIA Objective	Score
IIA1: climate change mitigation	Minor positive (+)
IIA2: travel and air quality	Minor positive (+)
IIA4: health and wellbeing	Minor positive (+)
IIA7: services and facilities	Minor positive (+)
IIA8: economy	Negligible uncertain (0?)
IIA9: biodiversity and geodiversity	Significant negative (--)
IIA10: landscape	Minor negative uncertain (-?)
IIA11: historic environment	Negligible uncertain (0?)
IIA12: natural resources	Significant negative (--)
IIA13: water resources	Negligible (0)
IIA14: flood risk	Negligible (0)

In relation to both the allocated site and WI06, the Integrated Impact Assessment Report (Appendix F) assesses the category 'Biodiversity and Geodiversity', as 'significant negative'. This is on the basis that the site is located within a SSSI Impact Risk Zone for residential planning applications, that it is within 500m of a locally designated wildlife site or ancient woodland and is within a priority habitat. Whilst the site is located within the SSSI Impact Risk Zone for Botley Wood and Everett's and Mushes Copses and Waltham Chase Meadows SSSI, given the distance between the site and these designations It is considered unlikely that the development at Mill Lane would adversely affect either site.

There are no locally designated wildlife sites on or adjacent to the site. It is noted that there is deciduous woodland, a priority habitat, close to the site. It is considered unlikely that the development at Mill Lane would adversely affect locally designated sites or priority habitats. The proposed scheme would be designed to retain all trees on site, as far as possible. The provision of additional planting along the northern boundary, including gapping up of the tree line, of the residential development would help to enhance connectivity of green infrastructure in the locality, connecting woodland areas.

For the category 'natural resources' both the draft allocation and WI06 are assessed as 'significant negative'. This is on the basis that the majority of the site is greenfield, that a significant proportion of the site is either grade 3 agricultural land or that less than 25% of the site is grade 1 or 2 agricultural land. It also identifies that a significant proportion of the site is within a Minerals Safeguarding Area. Whilst it is acknowledged that the site is greenfield, the site is located in a highly sustainable location. Natural England data indicates that the site is undifferentiated grade 3, which is classed as good to moderate. Detailed surveys will be undertaken to determine the quality of land in due course.

Whilst the site falls within the Hampshire Minerals and Waste Local Plan Mineral Consultation Area, this is not considered to be a constraint to development. It is noted that in response to an application for 120 dwellings adjacent to the site, which was approved on 24 June 2019 (ref 17/02615/FUL), HCC stated that the overlap of the minerals and waste consultation area was minimal and raised no objection.

It is noted that the updated SHELAA report, 2023 considers both the draft allocation and WI06 to be deliverable/developable. The majority of considerations have been assessed as Green with limited amber considerations.

38.0 Policy KN1 Ravenswood

A planning application was submitted for 200 homes at Ravenswood on 29 June 2018 (18/01612/OUT). Whilst the application was considered in a delegated report in March 2019, a decision still has not been issued, despite the application being submitted over 6 years ago. The Section 106 remains unsigned despite discussion appearing to have commenced in 2018. It is noted that since the Regulation 18 consultation two documents relating to nutrient mitigation have been submitted in January 2024,

Whilst Bloor Homes acknowledges the resolution to grant on this unallocated site, there are significant question marks about the delivery of the site given the lack of resolution of the S106 over a considerable period of time.

Bloor Homes is concerned that this proposed allocation would potentially fail to meet some of the emerging policies within this consultation, given the passage of time since the outline planning application was submitted.

It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), scores better than the Ravenswood site (refer to Appendix F, Site Assessment Proformas, pages 1066-1068) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024-1026).

Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, also outperforms the Ravenswood site (refer to Appendix F, Site Assessment Proformas, pages 1066-1068) in terms of sustainability within the Integrated Impact Assessment (refer to Appendix F, pages 1033-1035). This site is in single ownership and more likely to be deliverable than the Ravenswood site and can provide 40% affordable housing.

LOCAL PLAN MONITORING FRAMEWORK

39.0 Do you agree with the way strategic policies H1 housing provision /H2 housing phasing and supply /H3 spatial housing distribution, will be monitored?

If no, please explain how the monitoring for this policy should be amended?

Considering the current existing unmet need in South Hampshire (particularly for Havant and Portsmouth), and the prospect of increased housing requirements being introduced for Winchester and adjoining authorities (arising from the revised standard method), it appears unjustified to phase new greenfield allocations for the latter half of the plan period.

INTEGRATED IMPACT ASSESSMENT (SUSTAINABILITY APPRAISAL, EQUALITIES IMPACT ASSESSMENT AND HEALTH IMPACT ASSESSMENT)

40.0 If you have any comments regarding the Integrated Impact Assessment please include as much detail below including page, paragraph, and criteria number

It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), demonstrates a better or similar sustainability score compared to a number of other proposed allocations including Sir John Moore Barracks (Policy W2), Central Winchester Regeneration (Policy W7), Station Approach Regeneration Area (Policy W8), Tollgate Sawmill (Policy BW3) and Clayfield Park (Policy CC1) as detailed within the Regulation 19 Integrated Impact Assessment Report, 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024-1026). Furthermore, the site benefits from being under single ownership.

In addition, the land at the junction of Mill Lane, Wickham (WI06), which was part of the initial masterplan, also scores higher or similarly in sustainability terms within the Integrated Impact Assessment Report (refer to Appendix F, pages 1033-1035) than the above site. This site, similarly under single ownership, is more likely to be deliverable than the aforementioned brownfield sites and can support up to 40% affordable housing.

We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to around 100 and significantly elevate the number of affordable housing units from 16 to up to 40 on the site.

POLICIES MAP

41.0 If you have any comments regarding the policies map please include the policy number and Post Code of the location with as much detail as you can provide below

Policy WK5 should be expanded to the north to include land WI06. Further details are included in our representation in relation to Policy WK5