## WINCHESTER LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Personal Reference Number: ANON-

AQTS-3B54-Q

Representor: Blenheim Strategic

Partners |

Site: Land North of Rareridge Lane

Matter: 2

Spatial Strategy and Distribution of Development Policies (SP1, SP2, SP3,

H3, E2)

Date: April 2025



## 1.0 Introduction

- 1.1 This examination Hearing Statement has been prepared by tor&co on behalf of Blenheim Strategic Partners (BSP) (Personal Reference Number: ANON-AQTS-3B54-Q) in respect of Matter 2 – Spatial strategy and distribution of development Policies SP1, SP2, SP3, H1, H2, H3, and E1 and E2 of the Winchester Local Plan examination in public.
- 1.2 The comments made within this Statement respond directly to the questions set out in the Planning Inspectors Stage 1 Matters, Issues and Questions (ID13), and are presented in the context of the proposed site allocation BW4 (Land north of Rareridge Lane).
- 1.3 This Statement should be read in conjunction with the Blenheim Strategic Partners Regulation 19 representations.

## 2.0 Response to the Inspectors Questions

Issue: Whether the spatial strategy and distribution of development is positively prepared, justified, effective and consistent with national policy.

- Q1. The Settlement Hierarchy Review (2024) scores settlements and groups them which provides the settlement hierarchy in the District. Is the methodology used robust and the outcomes accurate? Is the distribution of development between the tiers of settlements justified and how has it been established?
- 2.1 The proposed allocation BW4 (Land north of Rareridge Lane) is in a highly sustainable location adjacent to the settlement of Bishop's Waltham. As reflected in the Settlement Hierarchy Review (2024), Bishop's Waltham is a sustainable settlement and one of the largest in the district. The site is within walking distance of the town centre (approximately a 15min walk) and within proximity to sustainable transport links. The Market Town status of Bishop's Waltham is reaffirmed within the Winchester Settlement Hierarchy and is recognised as having a range of services and facilities in more sustainable locations as per the Winchester Development Strategy and Site Selection document (July 2024). Accordingly, BSP consider the Settlement Hierarchy Review (2024) to be robust and represent an accurate basis for plan making.
  - Q2. Is the spatial strategy and settlement hierarchy as set out in Strategic policy SP2 justified as an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence?
- 2.2 BSP agree 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 delivery on the district's growth requirements. However, whilst the provision of 3,850 homes within Market Towns and Rural Areas will contribute towards sustainable housing delivery within the Borough, there is clearly a need for greater provision within the area. This is to:
  - Correctly apply and accommodate the SM LHN, from 2024

- Reflect a plan period of 2024-2041, removing any manipulation of the housing requirement/provision which seeks to supress forward delivery,
- Make appropriate provision to meet Winchester's own SM LHN as well as making a greater contribution towards the unmet need arising from the South Hampshire sub-region, including adjacent authorities of Portsmouth and Havant.
- Helps to better address the affordability challenge.
- Secures a demonstrable five-year supply on adoption of the plan.
- 2.3 In addition, in stipulating a target for new homes in each spatial location, any such target must not be considered as a maximum, but a minimum. Whilst it noted that the policy wording as currently drafted states 'for about' suggesting these are not fixed targets, it is considered that the policy wording should be clear, i.e. that these are minimum targets.
- 2.4 In this context, the allocation of Land North of Rareridge Lane becomes ever more important. It is situated within the Market Town of Bishop's Waltham and will contribute up to 100 dwellings towards this target as per draft Policy BW4.
  - Q3. Is the proposed distribution of housing and other development supported by the evidence in the SHELAA, settlement hierarchy, and IIA, and will it lead to an appropriate pattern of housing and economic growth?
- 2.5 BSP consider that the proposed allocation BW4 is supported by the evidence base. The 2023 SHELAA (under reference BW17) confirmed that the site is suitable and deliverable. Similarly, in accordance with the Settlement Hierarchy Review (2024), Bishop's Waltham is a sustainable settlement and represents one of the largest in the district. The market town status of Bishop's Waltham is reaffirmed within the Winchester Settlement Hierarchy and is recognised as having a range of services and facilities in more sustainable locations as per the Winchester Development Strategy and Site Selection document (July 2024). In the context of the proposed allocation BW4, it is noted in this document that 'this is considered suitable for allocation as it is close to the main centre of services and facilities in Bishop's Waltham including the primary school. It will not lead to coalescence of settlements, and it is well located to enhance and promote walking and cycling.'
- 2.6 In relation to the proposed allocation BW4, the overall conclusions of the IIA are supported, and in particular it is noted that the proposals are considered to have a positive effect for criteria IIA1 (Climate Change Mitigation), IIA2 (Travel and Air Quality), IIA4 (Health and Wellbeing) and IIA7 (Services and Facilities). Whilst it is noted that under IIA9 (Biodiversity and Geodiversity) the site is assessed to be significant negative, it is also acknowledged this scoring can be improved and suitably addressed with mitigation. This is also considered to apply to IIA12 (Natural Resources), with provision of a landscape-led design approach, which is justifiably and effectively secured under the policy wording.
  - Q4. Have settlement boundaries been defined in accordance with a clear and easily understood methodology that is consistently applied?
- 2.7 The NPPG emphasises the need for plan makers to be proactive in identifying as wide a range of sites as possible, as well as broad locations for development. NPPF paragraph 20 requires Local Plans to identify an appropriate and sustainable strategy for the pattern and scale of development,

- including housing. Equally, national planning policy stipulates that new development should be distributed to reduce travel and encourage more sustainable modes of travel.
- 2.8 In this context, the proposed allocation at Land North of Rareridge Lane has the potential to form a natural boundary to the settlement. Whilst being well-related to the settlement, and local settlement pattern, its self-contained nature ensures that it can be developed comprehensively and on its own merits with the provision of an enhanced natural buffer to the National Park.
  - Q5. Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?
- 2.9 No comment.
  - Q6. Would the Plan's spatial strategy strike the right balance between the need for development across brownfield and greenfield sites and any related impact on housing affordability?
- 2.10 The plan as currently drafted is considered to be overly reliant on large brownfield sites. These sites have a longer lead-in time, and such sites are typically more complicated and therefore expensive to develop which consequently puts pressure on the levels of community benefit, including affordable homes, that can be sustained without rendering such schemes unviable.
- 2.11 Under Policy H6, brownfield sites are required to deliver only 30% affordable housing, compared to 40% on greenfield sites. This means that brownfield sites cannot contribute the same level of affordable housing, yet they remain a key focus of the spatial strategy.
- 2.12 The Strategic Housing Market Assessment (SHMA) (July 2024) provides clear evidence of the chronic affordability challenge within the district. This reaffirms the importance of bringing forward greenfield allocations, such as Land North of Rareridge Lane, which are more readily delivered and can provide higher levels of affordable housing than equivalent brownfield sites.
- 2.13 Consequently, it is considered essential that greenfield opportunities are maximised, including proposed allocations such as that at Land North of Rareridge Lane.