

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: 3

The Plan's Vision and Strategic Policies
SP1, SP2 and SP3

Date: April 2025

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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 3 – The Plan’s vision and strategic policies SP1, SP2 and SP3** 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 BSP Regulation 19 representations.

2.0 Response to the Inspectors Questions

Issue 1: Whether the Vision and strategic policies SP1, SP2 and SP3 are positively prepared, justified, effective and consistent with national policy.

General matters

Q1. Having regard to NPPF 21, does the Plan make clear which policies should be regarded as ‘strategic policies’ and would they constitute a clear strategy for the pattern, scale and quality of development in the District?

- 2.1 No comment.

Q2: What is the justification for the Plan period of 2020 to 2040? incorporated within the Plan’s strategic policies?

- 2.2 It is considered unjustified to set the start of the plan period at 2020 for the sole purpose of securing ‘over-supply’ from the last four years. There is no support for this approach in the NPPF, PPG or in the standard methodology. Over-supply across previous years has no role to play in setting a planning requirement looking forward across the plan period. Specifically, the PPG makes no provision to manipulate a forward looking SM LHN requirement such that it is offset by delivery in past years in respect to plan-making (under the Housing Needs Assessment section).
- 2.3 As the plan was submitted in 2024, and the SM LHN resets the clock on the requirement at 1st April 2024, and can be relied upon for a period of 2 years, allowing for examination and adoption of the plan. The start of the plan period should be 2024 in line with the PPG ID 2a-008-20241212.
- 2.4 Additionally, paragraph 22 of the NPPF (2024) explicitly requires that local plans should look ahead for a minimum of 15 years from the point of adoption. If the plan is found sound it is unlikely it will be adopted before March 2026, the current proposed plan period would therefore fall short by one year of meeting the 15-year minimum requirement specified in the NPPF.

- 2.5 To address the above, the plan period should be extended to 2024-2041, which would align with the NPPF's requirements. This reaffirms the importance of including new allocations such as Land North of Rareridge Lane (BW4) which are deliverable within the plan period, rather relying on existing allocations being carried forward, or indeed on sites that have already been delivered prior to 2024 in the anticipated housing land supply

Policy SP1

Q1. The Plan sets out a vision and objectives to tackle climate and nature emergencies and create a greener District, living well, homes for all and a vibrant local economy. Those are given effect through Policy SP1. In so doing would that Plan be effective? Should the Plan objectives be incorporated within the Plan's strategic policies?

- 2.6 No comment.

Policy SP2

Q1: Given the transitional arrangements set out in NPPF December 2024 (paragraphs 234-236) would a modification requiring a Plan review within a stated timescale be clear and effective? Given the above national policy would such a modification be necessary for soundness?

- 2.7 No comment.

Q2: To accord with national policy at NPPF paragraph 60, to boost significantly the supply of homes, should the numbers expressed in policy SP2 be stated as minimums?

- 2.8 It is agreed that the numbers expressed in Policy SP2 should be clearly stated to be the absolute minimum. Winchester is facing a number of housing delivery challenges, namely the aforementioned affordability challenge, an over-reliance on brownfield sites, as well as relying on existing allocations and sites that have already been delivered prior to the anticipated local plan adoption year, and accommodating the unmet housing need from neighbouring authorities. It is clear therefore that WCC should be planning for a greater level of housing, and reaffirms the importance on delivering the proposed site allocations already within the draft plan. This is further reflected in NPPF paragraph 11 which states that *'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.'*
- 2.9 In this context, the Market Towns and Rural Area is considered critical to meet the district's pressing housing need. Whilst the provision under Policy SP2 for 3,850 homes within Market Towns and Rural Areas will contribute towards sustainable housing delivery within the Borough, there is a clear need for greater provision in the area.
- 2.10 Consequently, and whilst further flexibility is required to meet the 'minimum requirement', this reaffirms the importance of the proposed allocations already within the plan, including BW4, as meeting the very minimum level of housing need for the district in its most sustainable locations.

Q3. Policy SP2 sets out housing targets for the three spatial areas in the District. In so doing, does it provide appropriate support for employment uses to meet local needs?

2.11 No comment.

Policy SP3

Q1: Does the policy strike the right balance between protecting the countryside and promoting development to meet local needs? Should the policy explicitly recognise the sustainability of locations immediately adjacent to existing settlement boundaries or previously developed land;

2.12 The PPG 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. National planning policy stipulates that new development should be distributed to reduce travel and encourage more sustainable modes of travel.

2.13 The site at Land North of Rareridge Lane (BW4) is located directly adjacent to the eastern edge of the settlement of Bishop's Waltham, which is one of the largest settlements in the district. The site is within walking distance of the town centre (approximately a 15min walk) and within proximity to sustainable transport links.

2.14 BSP support the amended settlement boundary to accommodate draft allocation BW4, and consider that Policy SP3 should be worded in a flexible and positive manner which supports sustainable development opportunities coming forward adjacent to existing settlement boundaries to accommodate Winchester's pressing housing need.

Q2: Would policy SP3 accord with NPPF paragraph 89, which states that '... The use of previously developed land, and sites that are physically well-related to existing settlements, should be encourage where suitable opportunities exist.'?

2.15 In order to fulfil the housing challenges faced within the district, including in relation to affordable housing, and accommodating unmet housing need from other South Hampshire authorities, then compliance with NPPF paragraph 89 is vitally important. The wording of Policy SP3 therefore needs to be updated to be sufficiently flexible to ensure conformity with paragraph 89.

Q3 Should the countryside designation afforded by policy SP2 remain on sites allocated for development in the Plan?

2.16 Where sites have been allocated for development, then it is implicit that the countryside designation would not apply. Applying a blanket countryside designation to such sites, even where they clearly represent an extension to an existing settlement, represents a fundamental contradiction with the purpose and limitations associated with such policies. Such a designation is confusing to the decision maker, and therefore should not remain.

Q4: Does policy SP3 provide for the particular locational needs of essential infrastructure such as water and waste water infrastructure in accordance with PPG? Should it state that development should not increase flood risk and assessed any potential loss of the best and most versatile agricultural land ?

2.17 No comment.

Q5: To ensure the policy promotes biodiversity should it align with the Local Nature Recovery Strategy?

2.18 Biodiversity can be achieved through a range of different approaches, responsive to site specific circumstances. This may include alignment with the Local Natural Recovery Strategy, however policy should not dictate or constrain the promotion of biodiversity only through such alignment. The local plan needs to be flexible and positively prepared, and therefore there is no need for adopting a prescriptive policy stance with regard to the Local Nature Recovery Strategy, where this may not always be the most optimal approach to biodiversity on a site specific basis. The guidance allows for on-site and off-site solutions, allowing flexibility to secure mitigation.