

# 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: 8  
Development Allocations the Market  
Towns and Rural Areas (MTRAs)

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 8 – Development Allocations the Market Towns and Rural Areas (MTRAs)** 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 proposed housing site allocations in MTRAs would be justified, effective and consistent with national policy?**

### **Market towns**

#### **Bishop's Waltham**

#### **Policy BW4 Land North of Rareridge Lane**

**Q1. Would policy BW4 accord with the NPPF paragraph 182, which requires great weight to be attached to conserving and enhancing landscape and scenic beauty in National Parks?**

- 2.1 The current wording of Policy BW4 includes robust requirements which are considered to both conserve and enhance the landscape and scenic beauty in National Parks in accordance with NPPF paragraph 182.
- 2.2 Part i) of the draft policy requires development to be informed by a landscape-led masterplan. tor&co have been working closely with WCC and SDNP on the emerging landscape strategy for the site and will incorporate the following principles:
  - Retain a 20m belt of existing tree and shrubs;
  - Where planting is absent on the western extent of the northern boundary, a further 20m wide tree and shrub belt (widening to create a small woodland group in the north west corner) would be provided to create a continuous boundary of structural vegetation;
  - Built development would avoid the highest area of the site, in the north eastern corner. This area would form a new open space;
  - A new tree belt on the northwestern boundaries of 10.5m; and
  - Additional green infrastructure including landscape buffers along the northern edge of the site and green corridors allowing for views through the development.

- 2.3 This position is further reflected in the Statement of Common Ground that has been agreed between South Downs National Park Authority (SDNPA), and as stated in their representation *‘the SDNPA is committed to working with WCC and the site promotor to bring this site forward in a way which avoids or minimises any potential adverse impacts of the SDNP as per NPPF paragraph 182.’* In addition, *‘the SDNPA supports the amended policy wording and supporting text which sets out the need for a landscape-led design for the development.’*
- 2.4 It is acknowledged that a large part of the district north of Bishop’s Waltham is constrained due to its designation within the South Downs National Park. The allocation provides the potential to form a natural boundary to the settlement, rounding off the settlement. 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. Consequently, it is considered to be developable without unduly impacting on the setting and landscape value of the adjacent National Park.

**Q2. Given the existing use of the site, along with other constraints, including ecological constraints, what is the evidence to justify the indicative site capacity and generation of required Biodiversity Net Gain?**

*Ecological constraints*

- 2.5 It is noted that concerns have been raised regarding the ecological constraints of the site. It is emphasised that no part of the site is covered by any statutory designations, and any such designations that do exist in the wider area are well-separated from the site. Equally, there are no non-statutory designations affecting the site or its surroundings.
- 2.6 In addition, it is further highlighted that work proportionate to the evidence required at this stage, to support the site’s allocation, has been undertaken by BSP’s ecological consultant, EDP. Their assessment following a site visit has confirmed that:
- The eastern and central parts of the site contain areas of lowland mixed deciduous woodland, but it appears that this had been clear felled circa 2005 and is now only in *‘moderate condition’*, with limited structure and little woodland ground flora.
  - The site has been subject to some fly-tipping, with evidence of trespass.
  - The western part of the site is mixed scrub, and taking a precautionary approach (due to difficulty in accessing), it is in *‘moderate condition.’*
- 2.7 The habitat has not been identified as a ‘show-stopper’ and the mitigation advice provided is:
- a) Impacts can be minimised, with opportunities to retain and enhance the better quality existing habitats, considered and secured through future scheme design; and
  - b) Where those better parts of the habitat are retained, future management can be secured to enhance the habitat

- 2.8 It is clear that the site is not considered to constitute '*irreplaceable habitat*' and that mitigation can be provided, which is reflected in the draft policy wording. It is consequently considered that any potential ecological constraints can be adequately managed through a landscape-led design approach as stipulated in the policy wording.
- 2.9 Similarly, the proposed design approach will aim to achieve the optimal level of biodiversity net gain on site as far as possible, and if required, then off-site credits will also be explored in accordance with national guidance.

#### *Site capacity*

- 2.10 In Autumn 2022, a preliminary landscape and visual appraisal was undertaken to determine the sensitivity of the site and surrounding area to built development. Also, to inform the broad development strategy, through avoidance of sensitive areas and through reduction of potential residual landscape and visual effects, to establish the ultimate development capacity of the site.
- 2.11 This work has been further refined following engagement with the SDNP, informed by a Zone of Theoretical Visibility (ZTV) based on LIDAR data. This represents a highly detailed three-dimensional model of the landscape and townscape. Topographic features including landform, woodland, settlements, individual buildings, isolated trees, copses, hedgerows, embankments and other minor topographic features are all modelled.
- 2.12 The above described baseline analysis was intended to inform the mitigation and development strategy for the site, identifying publicly accessible areas of the landscape, residential properties or sensitive heritage assets that share inter-visibility with the site and which require some form of avoidance or reductive mitigation measures. Following this analysis, a landscape strategy was developed and further refined, to mitigate potential localised effects using avoidance or reductive measures.
- 2.13 The revised strategy would retain a 20m belt of existing trees and shrub vegetation on the northern boundary, currently 9-12m in height. In addition, where planting is absent on the western extent of the northern boundary, a further 20m wide tree and shrub belt (widening to create a small woodland group in the north western corner) would be provided to create a continuous boundary of structural vegetation. This boundary vegetation would form a continuation of the existing soft settlement edge, serving to screen the very large majority of built development from the PROWs to the north. In addition, built development would avoid the highest area of the site, in the north eastern corner.
- 2.14 Overall therefore, it is emphasised that the site capacity and overarching approach to its development has been directly informed by careful landscape-led analysis over the course of several years. This is therefore a clear indication of the site's capacity and deliverability assumptions.

#### *Other constraints*

- 2.15 The site lies within flood zone 1, and is not subject to any historical or environmental designations, with the exception of it being located within a nitrate vulnerable zone. In addition, the land is classified as Grade 4 – Poor

Agricultural Land and is not located within a mineral safeguarding area. There are no TPOs or listed buildings on the site or immediately adjacent to it, and the site does not fall within a conservation area. Consequently, the site is considered to represent an excellent opportunity for residential development due to the lack of technical constraints.

**Q3. Would the requirements of Policy BW4vii be clear in their intent so as to render the policy effective?**

- 2.16 BSP consider the requirements of Policy BW4vii to be clear in their intent and the policy is effective.

**Q4. Policy BW4i would require a landscape led masterplan. Policy BW4 ix and x provide additional requirements that could be covered by that masterplan. Paragraphs 14.20 and 14.24 set out requirements of a landscape led masterplan also, some of which are excluded from the policy text. In so doing, would the policy be effective? In this regard, would the policy be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?**

- 2.17 BSP consider that the policy wording as currently drafted is effective, clearly written and unambiguous. The nature of the proposals is that a landscape-led design approach will be further refined as an application comes forward on the site, in consultation with WCC officers and other relevant key stakeholders. The policy wording therefore does not need to be extended to include other requirements.

**Q5. Would the phasing of the latter part of this site allocation until 2030 be justified by the evidence?**

- 2.18 BSP consider this part of the policy is not justified. There is no justifiable reason to delay the delivery of sustainable sites, in the context of the NPPF and particularly given the serious questions arising and concerns over the overall housing requirement and land supply position. An over-reliance on brownfield sites, existing allocations and sites already delivered prior to adoption of the new plan, necessitate prioritising the delivery of greenfield sites without delay. This includes Land North of Rareridge Lane which has been confirmed to be deliverable through the SHELAA process.
- 2.19 Whilst progress with the site, through the application process, is dependent (in this case) on securing an allocation, it would be unjustified to further delay that progress by artificially holding back the site.