

# WINCHESTER LOCAL PLAN EXAMINATION

## Stage 1 Hearing Statement

Personal Reference Number: ANON-  
AQTS-3B5A-4

Representor: Blenheim Strategic  
Site: Land at Fairthorne Grange

Matter: 2  
Spatial Strategy and Distribution of  
Development Policies (Policies SP1,  
SP2, SP3, H3, E2)

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 (Personal Reference Number: ANON-AQTS-3B5A-4) in respect of **Matter 2 – Spatial strategy and distribution of development Policies SP1, SP2, SP3, H1, H2, H3, and E1 and E2 (Land at Fairthorne Grange)**, 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 opportunity site at Land at Fairthorne Grange.
- 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?**

- 1.4 No comment.

**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?**

- 2.1 Whilst Blenheim Strategic 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 delivering on the district's growth requirements.
- 2.2 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', suggesting these are not fixed targets, it is considered that the policy wording should be clear, i.e., that these are minimum targets.
- 2.3 Part ii) specifies provision for 5,650 new homes in the South Hampshire Urban Areas, however this principally comprises existing allocations and commitments, and a disproportionate reliance on a select few large allocations and windfall sites. Only 500 homes via new allocations are proposed, representing just 8.8% of the proposed spatial allocation for South Hampshire Urban Areas. This in the context of the unmet need across the PfSH area is wholly inadequate.

- 2.4 An over-reliance on sites already contained within the current plan does not represent an ambitious or positive basis for South Hampshire Urban Areas into the future. It also leads to the unjustified approach of seeking to manipulate delivery such that the trajectory can be balanced out (see Housing Topic Paper re phasing). The reality is that these previously planned developments were needed and should have been completed years ago, but they continue to deliver now due to the delays incurred.
- 2.5 The result has added to the chronic affordability challenge within the district, as set out in the SHMA (July 2024). Delayed delivery does not justify a restrained approach to future provision, which will only serve to further compound the district's affordability pressures.
- 2.6 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.*' This particularly applies to the South Hampshire Urban Areas and the need to contribute to meeting the PfSH strategy. As noted in paragraph 9.15, '*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.*' It is noted that the PfSHs Position Statement dated December 2023 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.*'
- 1.1 Much of this updated unmet need arises in the eastern part of the sub-region and it would be appropriate for the southern part of Winchester district to accommodate a significant element of this need, not only as a consequence of the geographical proximity but also the strategic road and rail links that already exist.
- 1.2 The South Hampshire Urban Areas can make a further contribution to housing numbers, and the Reg 19 plans recognises that North Whiteley is a sustainable neighbourhood for delivering housing and economic growth. As such, the IIA has failed to positively consider alternatives which would expressly meet more of the significant unmet need identified.
- 1.3 In this context, land at Fairthorne Grange could make a significant contribution towards housing delivery. It represents an exciting opportunity to provide high-quality family and affordable homes of the highest environmental standards within a landscape-led masterplan. It has the potential to set the benchmark for future development in the district, with its emphasis on high quality materials, energy efficiency and environmental enhancement.
- 2.7 In conclusion, the plan should set a much higher housing requirement, which reflects positive opportunities and available capacity. Blenheim Strategic do not consider the plan, as currently drafted, is based on sufficient evidence in relation to housing supply and delivery assumptions. In stipulating a target for new homes in each spatial location, any such target must not be considered as a maximum, but a minimum. The policy wording should be clear that these are minimum targets.

**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?**

- 2.8 The proposed distribution of housing does not fully align with the evidence in the SHELAA, Settlement Hierarchy Review (August 2024), and the Integrated Impact Assessment (IIA) (July 2024).
- 1.4 With reference to the opportunity at land at Fairthorne Grange, allocation and development of the site should be viewed positively in reducing the pressure to secure/accommodate additional development beyond Shawford Lake, around the rural village of Curdridge, in an area which remains under intense development pressure (as evidenced by the SHELAA), given its relationship to Botley.
- 1.5 Significantly, the development of the site could conclude the urban/rural edge of the new Whiteley community, tying into the new infrastructure provided with the new community and utilising the strong natural boundary of Shawfords Lake as the settlement edge, transitioning to the rural area. This would secure the provision of much needed new homes in a sustainable location, which maintains the existing settlement hierarchy and identity, including by retaining clear physical and visual separation between existing settlements, particularly Curdridge and Whiteley.
- 1.6 Importantly, development in this location would not alter the settlement identity of either Curdridge or Botley, they would remain set within the rural gap between the two wooded water course corridors (River Hamble and Shawford Lakes). The villages would maintain their existing rural character, presenting the opportunity for a stronger defence to maintaining that prevailing character and settlement hierarchy. Conversely, development on the edge of Curdridge, adjacent to the settlement boundary, would start to change and undermine the character of the village, and, having started the process of change, potentially lead to pressure for a greater urbanisation of the area between Shawford Lake and Botley / Botley Station.

**Q4. Have settlement boundaries been defined in accordance with a clear and easily understood methodology that is consistently applied?**

- 2.9 Blenheim Strategic consider that settlement boundaries have not been defined in a consistent or clear manner, and the current approach does not give due regard to national policy priorities and policy expectations. 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.
- 2.10 The current proposed approach under Policy SP3 of defining development in the countryside as simply land outside of settlement boundaries will restrict the ability for sustainable development opportunities adjacent to existing settlements to come forward.

- 2.11 The Development Strategy and Site Selection document (July 2024) describes North Whiteley as an area where major development has taken place and is continuing, demonstrating its suitability for housing delivery. It further recognises that land at Fairthorne Grange is well placed next to planned development at North Whiteley, presenting a logical extension to the settlement. In this context therefore, the wording of Policy SP3 as currently drafted does not acknowledge or reflect the growth potential of South Hampshire Urban Areas, nor its relative position within the settlement hierarchy. According to the overly restrictive stance contained in this policy, sustainable development opportunities adjacent to the settlement boundary of places such as North Whiteley are afforded the same policy status, as sites adjacent to small rural villages. This does not represent a sound basis upon which to take forward the local plan, and equally constrains the flexibility and responsiveness of the new local plan.

**Q5. Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?**

- 2.12 No, the council has not fully considered all realistic options for the distribution of development within the District.
- 2.13 Land at Fairthorne Grange is well positioned to meet the growth needs of North Whiteley. As shown in the vision document prepared by tor&co submitted with our Regulation 19 representations, the site complements nearby developments. It is conveniently located within a 15-minute walk of essential facilities and services, including bus and rail connections, maximising the benefits of local investment. The site sits adjacent to the new Whiteley cycleway that will connect Botley station to Whiteley village. Whiteley Town Centre is located within a 15 min (3km) cycle ride from the site, along a network of new segregated cycle routes. The site is in the ideal position to benefit from this sustainable active travel corridor.

**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?**

- 2.14 No, the Plan's spatial strategy fails to achieve an appropriate balance between brownfield and greenfield development, particularly in addressing the district's affordability challenges. 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.
- 2.15 The Strategic Housing Market Assessment (SHMA) (July 2024) provides clear evidence of the chronic affordability challenge within the district. However, the current strategy, which relies heavily on previous allocations with only 25% new allocations, will not be sufficient and will further compound the district's affordability pressures. Additional housing must be brought forward.
- 2.16 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.

- 2.17 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.
- 2.18 Furthermore, it is noted that Figure 4.1 of the Annual Monitoring Report highlights the overall downward trend for net completions on previously developed land, from 61% in the year 2011/12, to 20% in the year 2022/3. This clearly shows that further greenfield sites will be required to meet Winchester's needs going forward, given the reduced availability of previously developed sites, with variable capacity, and need for flexibility. Consequently, the draft strategy needs to be altered so that there is a better balance between greenfield and brownfield sites accordingly.