

WINCHESTER LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

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

Representor: Blenheim Strategic
Site: Land at Fairthorne Grange

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 (Personal Reference Number: ANON-AQTS-3B5A-4) in respect of **Matter 3 – The Plan’s vision and strategic policies SP1, SP2 and SP3 (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 BSP Regulation 19 representations.

2.0 Response to the Inspectors Questions

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 The Plan as currently drafted does not fully meet the requirements of NPPF 2023, paragraph 21, and related paragraphs 20, 22 and 23 regarding the role and function of strategic policies. Whilst it is acknowledged that the titles of the draft policies set out designated strategic policies, these policies, specifically SP1, and SP2 and SP3, fall short of the NPPF requirements for strategic policies, and consequently do not provide a clear strategy for the pattern, scale and quality of development in the District.
- 2.2 NPPF paragraph 20 states that ‘*strategic policies should set out an overall strategy for the pattern, scale and design quality of places*’ and critically make sufficient provision for ‘*homes (including affordable housing)*.’ Equally, NPPF paragraph 23 highlights that ‘*strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.*’
- 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 Overall, it is highlighted that the policies currently identified within the draft plan as strategic, especially SP1, SP2 and SP3 in the context of Matter 3, do not adequately fulfil the functions outlined in the NPPF for strategic policies. As a result, they do not provide a clear strategy to delivering on the district's pattern and development scale requirements, and on a broader note, in line with Issue 1, are not aligned with national policy in their current form.

Q2: What is the justification for the Plan period of 2020 to 2040?

- 2.6 It is entirely 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 planned housing 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).
- 2.7 As the plan was submitted in 2024, and the SM LHN can be relied upon for a period of 2 years, the start of the plan period should be 2024 in line with the PPG ID 2a-008-20241212.
- 2.8 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 likely 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.
- 2.9 To address the above, the plan period should be extended to 2024-2041, which would align with the NPPF's requirements.

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?

- 2.10 Blenheim Strategic welcomes the commitment contained in Policy SP1 to *'engage proactively with a range of partners to jointly find solutions to achieve high quality sustainable and inclusive developments.'* In addition, Blenheim Strategic support the acknowledgment within SP1 that the council must use available tools at its disposal to unlock sites which are key to the Plan's delivery.
- 2.11 In this context however, it is considered that Policy SP1 as currently drafted, fails to deliver in this respect. In particular, the policy lacks clarity over the vision to *'address the needs of the area...and respond to the wider relationship with neighbouring areas.'* Instead of a positive and flexible response to this element of the vision, and requirements under the Duty to Cooperate (specifically related

to the joint working through the PfSH), the plan represents a restrained approach to housing provision and delivery. Indeed, the '*objectives*' make no reference to delivering homes to accommodate the unmet needs of neighbouring areas, with a reference only to meeting '*local needs*' under objective iv).

- 2.12 The same applies with respect to addressing affordability issues. Despite the chronic affordability challenge that Winchester is facing, there is no mention in either the vision or objectives to addressing affordability, more generally over and above the delivery of affordable housing, despite the clear acknowledgment (in the foreword) of the challenge of affordability.
- 2.13 Given that Policy SP1 is directly tied to both the Vision and Objectives by requiring development proposals to contribute to, and be compatible with them, it is imperative that they fully reflect both the need to address the stated affordability issues, and need to assist with accommodating some of the wider sub-regional unmet housing needs (beyond purely local housing needs) under the Duty to Co-operate. This is considered essential in ensuring that the local plan is effective. Equally, in light of the interconnectedness of the plan's objectives, with the plan's strategic policies, then they should also be incorporated within the policies themselves.

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?

- 2.14 Paragraph 236 of the NPPF (2024) stipulates that if an adopted plan addresses less than 80% of local housing needs, as assessed using the latest standard methodology, the planning authority is required to begin work on a new plan in order to address the housing shortfall. This applies to Winchester, given the planned provision of 755 dpa and SM LHN of 1,157 dpa.
- 2.15 On this basis, it is considered that a clear timescale should be included within the plan, as well as any consequence of a failure to meet the timescale (e.g. that NPPF para 11 d) will apply), to ensure that the significantly greater housing needs arising from the revised standard method are met going forwards. Such a modification is required to ensure that the plan is soundly based.

Q2: Should the numbers expressed in policy SP2 be stated as minimums?

- 2.16 It is agreed that the numbers expressed in Policy SP2 should be clearly stated to be the absolute minimum.
- 2.17 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.

- 2.18 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.
- 2.19 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.
- 2.20 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.*'
- 2.21 In short, the plan under Policy SP2, should aim for a much higher housing supply, which reflects positive opportunities and available capacity. It is not considered that the plan as currently drafted is based on sufficient evidence in relation to housing supply and delivery assumptions. Accordingly, 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. 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 the stated figures should be acknowledged within the policy wording and ultimately via additional strategic allocations.

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?

- 2.22 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;

- 2.23 Whilst Blenheim Strategic recognise the importance of the countryside, and its role within the district, the draft wording of Policy SP3 is considered overly

restrictive in its application. Notably, the policy states that *'in the countryside, defined as land outside the settlement boundaries, the Local Planning Authority'* will only permit certain forms of development. This includes expansion or suitable replacement of existing buildings, tourist accommodation and countryside related uses.

- 2.24 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.
- 2.25 Defining development in the countryside simply as land outside of settlement boundaries is considered to restrict the ability for sustainable development opportunities adjacent to existing settlements coming forward. As outlined in the Development Strategy and Site Selection document (July 2024), North Whiteley is identified 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.
- 2.26 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.
- 2.27 Accordingly, the policy as currently drafted is not considered to strike the right balance between protecting the countryside, and accommodating development requirements in response to local need, particularly adjacent to Winchester City itself, which is the most sustainable location in the district. The current policy wording is excessively restrictive, and there should be explicit acknowledgement of opportunities adjacent to the settlement boundaries that are favourably placed to support the district's 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.'?

- 2.28 As set out in the response to Q1, Policy SP3 as currently drafted does not accord with NPPF paragraph 89, and specifically the need to encourage sustainable opportunities which are physically well-related to existing settlements. In order to fulfil the housing challenges faced within the district, including in relation to affordable housing, and accommodating unmet housing need from other neighbouring South Hampshire authorities, then compliance with NPPF paragraph 89 is vitally important. It is clear that the policy wording is inflexible and highly constrained, and requires amending to ensure conformity with national policy.

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

- 2.29 Where sites have been allocated for development which are outside the existing settlement boundary, then it is implicit that the settlement boundary is no longer fit for purpose, and requires urgent review. 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 therefore should not remain.

Q4: Does policy SP23 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?

- 2.30 On the basis that policies should be positively prepared, flexible and responsive to local needs, then policy wording should not include overly restrictive expectations which may constrain the most sustainable development opportunities coming forward in the district. Each site should be assessed on its own merits, and based on site-specific circumstances, and stipulating that development should not increase flood risk and assess any loss of high quality agricultural land for example is unnecessary, and may constrain growth in the district's most favourable locations. Such a policy requirement does not allow for site specific mitigation and attenuation mechanisms to deal with any associated flood risk considerations. Furthermore, the loss of high quality agricultural land does not factor in the potential biodiversity and landscape benefits that could be introduced. Consequently, there is no need for such a requirement in policy.

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

- 2.31 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.