



Winchester Submission Draft Local Plan 2020-2040

Hearing Statement

Matter 2: Spatial Strategy & Distribution of Development Policies

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Management | Development | Planning

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1. INTRODUCTION

- 1.1 This Matter 2 Hearing Statement has been prepared on behalf of Landacre Developments Limited. Our client has previously made representations on the Winchester District Submission Draft Local Plan 2020 – 2040 (Regulation 19) in October 2024. Our client has land interests at Land at Mill Chase, Winchester Road, Bishops Waltham (SHELAA Site BW11). This site is fully within our client's control and there are no legal issues to prevent this site coming forward in the next 5 years.
- 1.2 Notwithstanding our client's land interests this Statement has been prepared in recognition of the prevailing planning policy and guidance. This includes the National Planning Policy Framework (December 2023) (for which this Plan is being examined under transitional arrangements), and Planning Practice Guidance.
- 1.3 This statement provides a response to the Inspector's Matters, Issues and Questions raised under Matter 2 Spatial Strategy and Distribution of Development Policies and whether these policies of the Winchester District Submission Draft Local Plan 2020 – 2040 are positively prepared, justified, effective and consistent with national policy. This statement sets out responses to the following policies and Inspector's questions for this Matter:
- **Policy H3 Spatial Housing Distribution (Questions 1, 2, 3 and 5).**
- 1.4 This Statement highlights a need for amendments to **Policy H3 'Spatial Housing Distribution'** to direct a higher proportion of housing growth to the most sustainable Market Towns including Bishops Waltham and to remove growth proposed to the least sustainable Intermediate Rural Settlements of South Wonston and Sutton Scotney.
- 1.5 I consider that the proposed changes would improve the soundness of the Plan in accordance with Paragraph 35 of the NPPF.

2. RESPONSE TO MATTER 2 SPATIAL STRATEGY AND DISTRIBUTION OF DEVELOPMENT POLICIES

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

1. 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 distribution of development in ‘Policy H3 Spatial Housing Distribution’ is not justified or consistent with the settlement hierarchy and the sustainability of settlements within the hierarchy. Insufficient growth is directed to the most sustainable Market Towns including Bishops Waltham and growth is inappropriately directed to the ‘Intermediate Rural Settlements’ of South Wonston and Sutton Scotney which are not sustainable to accommodate allocations.
- 2.2 Bishops Waltham is identified in the draft Local Plan settlement hierarchy as one of the most sustainable Market Towns to accommodate growth over the Plan period. However, there is potential to accommodate a higher level of growth in Bishops Waltham than currently identified in the draft Local Plan.
- 2.3 A Settlement Hierarchy assessment¹ has been undertaken by the Council which provides an up-to-date assessment of settlements in the district to determine their place in the settlement hierarchy and to inform the Local Plan spatial strategy. Bishops Waltham scores highly in the Council’s assessment of daily facilities and services with only the settlement of Winchester City scoring higher. A comparative assessment of key services and facilities between Bishops Waltham, Sutton Scotney and South Wonston is set out in **Appendix 1** to this Hearing Statement.
- 2.4 Bishops Waltham is highly sustainable to accommodate significant growth with a regular public transport service, Post Office, full range of healthcare and other facilities, a range of convenience and other retail, pre-school and primary school, excellent community facilities and a range of employment opportunities.

¹ Settlement Hierarchy Background Paper, WCC, August 2024 (DS01).

- 2.5 The Local Plan identifies growth of 765 dwellings in Bishops Waltham over the Plan period to 2040. However, after the deduction of 340 net completions early in the plan period (2020 – 2023) only 425 dwellings are planned for including just one new allocation of 100 dwellings. The settlement can accommodate a higher level of growth in view of its overall sustainability, local constraints and the availability of suitable, available and achievable site options (which the Council has been aware of since the Regulation 18 stage).
- 2.6 The draft Local Plan directs inappropriate growth to the intermediate rural settlements of South Wonston and Sutton Scotney which is not a sustainable approach in view of the lack of key facilities in these settlements and in relation to their position in the settlement hierarchy.
- 2.7 The draft Local Plan identifies growth of 70 dwellings in South Wonston and 80 dwellings in Sutton Scotney over the Plan period. South Wonston and Sutton Scotney are not sustainable settlements to accommodate growth and lack an appropriate range of key facilities. South Wonston lacks a regular public transport service, health facilities and employment opportunities. Sutton Scotney lacks a regular public transport service, primary school, appropriate range of health facilities and retail. The level of growth directed to these settlements is also not of a scale to facilitate any significant improvement in local services and is not supported by existing services and facilities.
- 2.8 Therefore, consistent with the settlement hierarchy and settlement assessments it is appropriate for the draft Local Plan to be amended to direct higher growth to the most sustainable Market Towns including Bishops Waltham and reduce growth directed to the least sustainable Intermediate Rural Settlements of South Wonston and Sutton Scotney.

2. 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?

- 2.9 Policy SP2 ‘Spatial Strategy and Development Principles’ refers to the spatial distribution of development which is set out in further detail within Policy H3. The Overall Spatial Strategy and distribution of development (Growth Option 1A) seeks to locate development in accordance with the settlement hierarchy and in consideration of constraints and the availability of suitable, available and achievable sites. As set out in response to Question 5, there is a need for the refinement of this growth option in relation to the proposed distribution of development within

the MTRAs and also to progress the PfSH SPS and strategy for the 'Broad Areas of Search for Growth'.

- 2.10 The proposed growth Option 1A, distribution of growth in the Market Towns in Rural Areas (MRTAs), and allocation of sites is not in accordance with the settlement hierarchy and evidence base including IIA, 2023 SHELAA and Development Strategy and Site Selection Topic Paper. Implementation of this growth option directs insufficient growth to the most sustainable Market Towns including Bishops Waltham and inappropriate growth to the Intermediate Rural Settlements of South Wonston and Sutton Scotney which are not sustainable to support proposed Local Plan allocations. This is further discussed in relation to our responses to Questions 3 and 5.

3. 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?

- 2.11 The proposed distribution of housing development is not supported by the Council's own evidence in relation to the Settlement Hierarchy, SHELAA and IIA and will not lead to an appropriate pattern of housing development.
- 2.12 As one of the most sustainable Market Towns, Bishops Waltham can accommodate a higher level of growth than identified in the draft Local Plan. This is in view of its position within the Settlement Hierarchy, overall sustainability (in terms of the range of services, facilities, infrastructure and employment) and the availability of good sites. Bishops Waltham is identified by the Council as one of the most sustainable Market Towns and scores highly in the Council's assessment of daily facilities and services with only the settlement of Winchester City scoring higher.
- 2.13 An inappropriate level of growth is directed to the intermediate rural settlements of South Wonston and Sutton Scotney which is inconsistent with their position in the Settlement Hierarchy, and because they lack the key facilities and infrastructure required to make them sufficiently sustainable to accommodate residential allocations.
- 2.14 A Settlement Hierarchy assessment² has been undertaken by the Council which provides an up-to-date assessment of settlements in the district to determine their place in the settlement

² Settlement Hierarchy Background Paper, WCC, August 2024.

hierarchy and has informed the Local Plan Spatial Strategy. The settlement assessment for Bishops Waltham demonstrates the sustainability of the settlement and its ability to accommodate a higher level of growth. The settlement assessments for South Wonston and Sutton Scotney do not justify the proposed spatial strategy and allocations in these Intermediate Rural Settlements.

- 2.15 Appendix 1 to this Statement sets out a comparative assessment of facilities and services for the settlements of Bishops Waltham, South Wonston and Sutton Scotney. Bishops Waltham is highly sustainable to accommodate significant growth with a regular public transport service, Post Office, full range of healthcare and other facilities, a range of convenience and other retail, pre-school and primary school, excellent community facilities and a range of employment opportunities. Sutton Scotney lacks the basic range of key facilities to support a housing allocation as it lacks a primary school and has a limited range of health and retail facilities. South Wonston also lacks the key facilities to support an allocation as it lacks a doctor's surgery and regular bus service.
- 2.16 An Integrated Impact Assessment (including SA)³ has been undertaken of the Submission Local Plan (Regulation 19) by LUC on behalf of WCC. Chapter 4 of the IIA concludes that the preferred option for the distribution of growth is Option 1A which is an evolution of the adopted Local Plan development strategy and has performed best through the Council's Reg 19 SA. Option 1A incorporates a development strategy focussed on distributing development in accordance with the sustainable hierarchy of settlements but increases the proportion of growth in Winchester Town and the Market Towns and Rural Areas due to constraints limiting growth in the South Hampshire Urban Areas.
- 2.17 The IAA concludes that for the MTRAs growth is directed to the most sustainable rural settlements in accordance with the settlement hierarchy. However, within the MTRAs, the Plan does not direct proportionate growth to the most sustainable rural settlements in the settlement hierarchy and therefore the SA conclusions in relation to Option 1A are not justified or robust. This is because insufficient growth is directed to the Market Towns and growth is inappropriately directed to the unsustainable intermediate rural settlements of South Wonston and Sutton Scotney.
- 2.18 For the SA conclusions to be justified for Growth Option 1A, a higher level of growth needs to be directed to the most sustainable Market Towns including Bishops Waltham reflecting the

³ SD02a Winchester District Proposed Submission Local Plan (Regulation 19) Integrated Impact Assessment Report (LUC, July 2024).

sustainability of this settlement tier, local constraints and availability of good sites. The Intermediate Rural Settlements of South Wonston and Sutton Scotney are not sustainable rural settlements to accommodate growth and do not accord with Growth Strategy 1A. These intermediate rural settlements lack the core range of facilities to be sufficiently suitable to support Local Plan allocations. The level of growth directed to South Wonston and Sutton Scotney will also not assist with their sustainability as the SA concludes that the level of growth directed to these rural settlements will not make a substantial difference to infrastructure provision.

- 2.19 The Development Strategy and Site Selection Topic Paper⁴, draws on the findings of the 2023 SHELAA and IIA which have appraised site options within the Market Towns including Bishops Waltham. The 2023 SHELAA identifies 9 sites within or adjacent to the settlement boundary of Bishops Waltham with a total capacity of 1,163 dwellings. The Development Strategy and Site Selection Paper states that except for site BW4, alternative SHELAA sites have been discounted due to distance from services and facilities in the settlement, including district centre or in relation to impact on settlements gaps. There is insufficient evidence presented in the Development Strategy and Site Selection Topic Paper, 2023 SHELAA and Regulation 19 IIA site appraisals to justify the allocation of only one site in Bishops Waltham and there is potential for a higher level of growth. Therefore, the proposed distribution of development within the Market Towns and Intermediate Rural Settlements is not in accordance with the Settlement Hierarchy and the Council's evidence.
- 2.20 The spatial strategy and allocation of Land at West Hill Road North, South Wonston is also not supported by the Council's evidence. The Council's Development Strategy and Site Selection Topic Paper 5 includes an appraisal of Land at West Hill Road North. The assessment identifies that site is in a prominent location and visible over a wider area in viewpoints to the north, including the Drove public right of way, Stainers Lane, Wonston Lane and Christmas Hill. The assessment concludes the site is in an area of high landscape sensitivity, contributes to the distinctive setting and identify of the village and protection from development is the preferred option.
- 2.21 Overall, the proposed development strategy and Growth Option 1A is broadly a sustainable approach but the implementation and allocation of sites in the MRTAs is not in accordance with this strategy, the Settlement Hierarchy, 2023 SHELAA and IIA (incorporating SA).

⁴ Development Strategy and Site Selection (July 2024)

⁵ Development Strategy and Site Selection Proposed Submission Plan, Appendix 3 – Initial Technical Appraisals

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

2.22 The Regulation 19 Integrated Impact Assessment sets out the consideration of 5 alternative options for the distribution of development in the district which have been appraised during preparation of the Local Plan include the following:

- **Option 1:** Development Strategy based on the approach in the existing Local Plan of distributing development to the sustainable hierarchy of settlements.
- **Option 1A:** Variation of Option 1 that reduces the housing target for the South Hampshire Urban Areas and increases growth at Winchester Town and the Market Towns and Rural Areas.
- **Option 2:** To focus development on Winchester itself and other larger and more sustainable settlements.
- **Option 3:** A strategy that includes one or more completely new strategic allocations or new settlements.
- **Option 4:** To disperse development around the district largely in proportion to the size of the existing settlements.

2.23 It is considered that not all realistic options have been robustly considered for the distribution of development during preparation of the draft Local Plan. There is a need for further refinement of Option 1A in relation to the proposed distribution of development within the MTRAs and also to more robustly consider the PfSH SPS and the strategy for the Broad Areas of Search for Growth identified in Policy SP8. Refinement of this growth option will more closely align the spatial strategy with the settlement hierarchy, IIA, the 2023 SHELAA and the need to locate development in the most sustainable settlements in the MTRAs.

2.24 A more sustainable reasonable alternative option for the distribution of development within the MTRAs is to direct a higher proportion of planned growth to the most sustainable Market Towns including Bishops Waltham. This is appropriate in view of the overall sustainability of the market towns of Bishops Waltham and Alresford, consideration of constraints, facilities services and infrastructure and the location of suitable, available and achievable site options. Lower growth should be directed to the Intermediate Rural Settlements of South Wonston and Sutton Scotney which lack the basic facilities and infrastructure to support residential allocations.

2.25 The IIA and Housing Topic Paper⁶ refer to the spatial strategy and the proposed distribution of development reflecting the PfSH Spatial Position Statement and strategy. However, in the preparation of the Regulation 19 Local Plan the Council has undertaken limited assessment of the ‘Broad Areas of Search for Growth’ and the option identified East of Botley. The Housing Topic Paper states that no further appraisal of the Broad Areas of Search for growth were undertaken as this would require further evidence gathering, appraisal of reasonable alternatives and could have delayed the Local Plan. However, given the scale of unmet housing need in the wider PfSH area robust appraisal of the SPS Broad Areas of Search for Growth within Winchester District could have resulted in a more significant contribution to unmet needs in the area.

⁶ ED 02 Housing Topic Paper Update, January 2025

APPENDIX 1 BISHOPS WALTHAM, SUTTON SCOTNEY AND SOUTH WONSTON FACILITIES ASSESSMENT

Settlement	Post Office	Healthcare			Other Facilities				Recreation and Open Space				Transport				Retail		Education				Community Facilities	High Speed Broadband	Employment	
	Access to Post Office Services	Doctors	Dentist	Opticians	Library	Petrol Station	Chemist	Bank	Children's Play Areas	Parks and Publicly Accessible Open Space	Outdoor Sports Facilities	Built Leisure	Daily Bus Services (hourly)	Daily Bus Services (Infrequent)	Weekly Bus Services	Main Line Train Station	Convenience	Other Convenience	Pre School	Primary School	Secondary School	Other Education	Church, Pub, Community Hall, Café, Restaurant	Access to superfast broadband	Access to any employment opportunity	2/3 Employment
Bishops Waltham	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes	N/A	N/A	No	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes	Yes
Sutton Scotney	Yes	Yes	No	No	No	Yes	No	No	Yes	Yes	Yes	No	No	Yes	N/A	No	Yes	No	Yes	No	No	No	Yes	Yes	Yes	Yes
South Wonston	Yes	No	No	No	No	No	No	No	Yes	Yes	Yes	No	No	Yes	N/A	No	Yes	No	Yes	Yes	No	No	Yes	Yes	Yes	No

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