WINCHESTER CITY COUNCIL LOCAL PLAN EXAMINATION - STAGE 1 HEARINGS

MATTER 2: SPATIAL STRATEGY & DISTRIBUTION OF DEVELOPMENT POLICIES SP1, SP2, SP3, H1, H2, H3, AND E1 AND E2

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REPORT CONTROL

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1.0 INTRODUCTION

- 1.1 On behalf of Barwood Land, Grass Roots Planning have been instructed to make representations to the emerging Local Plan (LP) for Winchester City Council (WCC) in which we have also sought to promote a site for housing allocation referred to as Land north of Cranbourne Drive, Otterbourne. Our involvement in this site stretches back to autumn 2022 when we were commissioned to undertake consultation with the Parish Council (PC) and local community on potential proposals for this site and to make representations to the Council's Regulation 18 LP consultation.
- 1.2 We have set out our representations within the earlier consultation stages to the LP and these represent our position on the plan and its constituent parts; however, this statement seeks to elaborate on the issues and concerns previously raised and respond to the Inspector's Matters, Issus and Questions (MIQs) set out in the Inspector Note 2 V2 (ED13).
- 1.3 This statement relates to Matter 2 which refers to the spatial strategy and distribution of development specifically policies SP1, SP2, SP3, H1, H2, H3, and E1 and E2.

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?

- 1.4 WCC's Settlement Hierarchy Review (2024) sets out the Councils approach to scoring settlements into groups to provide an overall spatial strategy, which in turn should then inform the most suitable places for housing growth.
- 1.5 As we have previously set out in earlier representations to the LP, we have concerns regarding the methodology used to assess settlements, as we believe this has resulted in some of those smaller yet extremely sustainable settlements (suitable to accommodate further growth) having been overlooked in favour of the larger towns (often constrained) and strategic allocations (which take a significant amount of time to come forward). The spatial approach progressed is therefore considered too 'top heavy', potentially leading to issues with not enough housing coming forward at the right time to meet local needs.
- 1.6 The "settlement hierarchy" ranks settlements according to the availability and accessibility of a broad range of facilities, the settlement's economic role and the environmental

constraints to development. As set out in para 83 of the Framework (and reiterated in WCC's Settlement Hierarchy 2022) "*Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby (paragraph 83, NPPF)*".

- 1.7 A points-based scoring system was used by WCC to rank settlements, with points being scored for the presence and accessibility of services and facilities, with different facilities also attracting different scores according to their assumed contribution to a self-sustaining community. Whilst we agree this is a sensible starting point; the approach omits considering the accessibility of all services and facilities within walking/cycling distance or via a short public transport journey (if they are outside the settlement). For example, an urban extension to Winchester might be 5km from a facility on the other side of the settlement or 2.5km from the city centre, whereas with regard to a Parish, they might omit facilities in adjacent Parishes which are within a short walking/cycling distance.
- 1.8 As we previously set out in our response to the Reg.18 and 19 LP consultations, sustainability can be promoted amongst smaller settlements by treating these as parts of a 'polycentric' settlement. This approach considers the propensity for people to travel to their nearest facility, even if that lies beyond their tightly defined village boundary. In this regard reviewing the settlement of Otterbourne and where this should rank in the hierarchy, it is our view that the settlements sustainability should be considered on the basis of it forming part of a polycentric network of adjoining villages. Otterbourne is close to other settlements and has a significant number of amenities and services within walking/cycling distance, indeed these are commensurate to that expected of a much larger settlement. Following the polycentric model, the score appointed to Otterbourne would have been significantly higher, with the ability to access a secondary school, GP surgery and railway station all within cycling distance or accessible by public transport.
- 1.9 In reviewing the assessments and scores awarded, it is clear this consideration did not factor into the progressed settlement hierarchy, indeed there has been no direct response as to why the Settlement should not be considered as part of a polycentric model. If it had of been, in respect of Daily Facilities/ Services, Otterbourne could have scored a full 20 points. However, Otterbourne was awarded a 0 under pre-school / nursery, despite there being various pre-school / nursery opportunities in the vicinity which residents obviously utilise, including Bright Horizons and Otterbourne Day Nursery and Preschool on Otterbourne Hill all within walking distance. Otterbourne was also given a score of 0 regarding access to a train station, when Shawford train station is within a short c. 2.5km cycling distance and also accessible via public transport.

- 1.10 If we refer specifically to the Settlement Hierarchy Background Paper informing the LP, this states in para 3.4 that the review of facilities accounts for "*Presence of various services and facilities based upon a survey of all roads extending 1.6km from the edge of each settlement*". However, this is clearly not the case. Bright Horizons Nursery is located just 0.8 km from the settlement boundary and has not been counted as an accessible service for Otterbourne.
- 1.11 Whilst details such as this may appear minor considering the overall soundness of the plan, we have noted numerous mistakes / inconsistencies which have formed the basis for settlement ranking. In reviewing the Council's LP Reg. 18 responses document regarding the Settlement Hierarchy, WCC provide a very basic response on why certain facilities were not included to count towards the settlements score being that they were "*too far outside the settlement boundary*". We would question at what level something should be considered too far? Indeed, this does not follow their own methodology set out above.
- 1.12 These issues have been raised through the consultation process but have never been rectified, we can only again assume this is due to time pressures as a result of fast tracking the LP to examination whether the evidence behind the progressed strategy or allocations pursued is accurate or not. This is not, therefore, considered to be a LP progressed on the basis of a robust evidence base.
- 1.13 WCC's response also states that "*The assessment of individual sites is informed by the IIA* which considered the proximity of services and facilities. However, when considering the place each settlement should have in the settlement hierarchy, it is considered more appropriate to focus on the services and facilities which are present in that settlement". This is clearly not a robust or proactive response, when considering the sustainability of a settlement in terms of its ability to cope with additional growth, all available facilities in walking/ cycling distance should be considered.
- 1.14 When referring to specific reassessment of settlements, WCC highlight various representations have questioned why South Wonston, Colden Common, Denmead, Otterbourne and Swanmore have been classified as they have, all of which raise similar issues to those previously described. WCC's response states that these comments have been noted, and certain amendments have been made including in the recategorisation of Swanmore as a larger rural settlement. We strongly believe that based on the evidence presented, Otterbourne should also be reclassified as a larger rural settlement, and WCC has provided no justification as to why this has not been done. There are other notable inconsistencies in whether responses have been considered or simply overlooked across the board, reflecting the rushed nature of this LP, which should have been able to confidently

address criticisms arising from the Reg. 18 and 19 consultations robustly and consistently before progressing.

1.15 Assessing settlements such as Otterbourne, using Parish boundaries as 'hard lines' is inappropriate and does not reflect the reality of how people live and interact with their environs. Instead, we believe that given the availability of services in and around Otterbourne, it should be considered as part of a 'polycentric' settlement and one which could and should play a more significant role in terms of meeting the future housing needs of the district.

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?

- 1.16 Policies SP2 and H3 both refer to the spatial strategy and distribution of housing, which are not considered to be positively prepared or indeed represent the most appropriate strategy to meet the area's LHN. The approach followed continues to be too focused on Winchester Town and South Hampshire Urban Areas, neglecting to fully consider the potential that smaller sustainably located towns and villages can offer. Housing should be distributed more evenly across the district, to support the facilities in smaller towns and villages and deliver affordable housing across the district.
- 1.17 There are no doubt various locations in Market Towns and Rural Areas which are suitable to deliver enhanced levels of growth. This is particularly apparent when considering sustainable settlements such as Otterbourne, which based on the services and facilities available, could deliver significantly more dwellings than are currently allocated to the settlement.
- 1.18 Paragraph 9.28 of the LP states that "*The smaller 'intermediate' rural settlements have modest housing provision, as they do not benefit from significant commitments or completions*". This is not an appropriate rationale as the chosen growth strategy should be focused on the sustainability and suitableness of a place rather than previous commitments i.e., continuing existing development trends rather than assessing the evidence in respect to the accessibility / sustainability of specific sites and settlements. Simply following past trends is a self-fulfilling prophecy and not a rational way to plan. This approach is as unsound as it is unjustified.

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?

- 1.19 The amount of development proposed for the smaller / intermediate rural settlements does not appear to be appropriately justified anywhere in the Plan, with the number of proposed dwellings assigned appearing largely arbitrary. The supporting text (para. 9.26) claims that the distribution of housing is based on the sustainable development strategy (Policy SP2), which splits the district into three spatial areas with a new homes requirement for each, yet policy SP2 provides no reasoned justification as to how the amount apportioned to each area has been arrived at. No reference is made to the amount each of the settlements should grow to meet their LHN and support their service base to ensure the ongoing vitality and viability of communities.
- 1.20 Of the 3,825 homes apportioned to the 'Market Towns and Rural Areas' there also appears to be no reasoned justification in the Plan as to how this has been distributed amongst the various settlements.
- 1.21 Furthermore, para 68 of the Framework confirms that in providing an indicative figure at a neighbourhood level, that figure should take account of "*factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority*." We cannot see from the evidence base provided in support of the LP that any specific 'needs' of the Intermediate Rural Settlements were considered as part of the approach to assigning housing figures.
- 1.22 In view of the above, it is considered that the spatial distribution of housing as identified in Policy H3, is unjustified and fails to explain or justify how the total housing provision for the Market Towns and Rural Area and specifically the Intermediate Rural Settlements has been determined, and whether this has accounted for the specific needs of those settlements for additional housing or the scope for increased growth to be sustainably accommodated.
- 1.23 We consider that there is demonstrably scope and need for the Intermediate Rural Settlement group as a whole, and Otterbourne specifically, to be assigned a greater level of housing growth and Policy H3 should be amended to reflect this.
- 1.24 In the case of Otterbourne, the Hierarchy Review 2024 gives the settlement a score of 18 and it is therefore characterised as an Intermediate Rural Settlement. However, as referenced above, the only daily facilities/services which are not contained within Otterbourne are a pre-school and main line train station. But these are in fact facilities that are available within the directly adjacent settlements of Otterbourne Hill and Shawford. The pre-school is just 800m south of Otterbourne, accessible using direct cycle and footpath links, and the train station is just 2.5kmway, a reasonable distance to cycle. Reflecting the accessibility of these facilities properly would mean that Otterbourne would score a further 4 points, using the Council's methodology, taking it to a total of 22 points and thus changing its categorisation in the

hierarchy to a 'Larger Rural Settlement' suitable to accommodate larger allocations of up to 90-100 dwellings.

- 1.25 We strongly believe the spatial strategy continues to be too focused on Winchester Town and South Hampshire Urban Areas, neglecting to fully consider the potential that smaller sustainably located towns and villages can offer. This approach relies too heavily on Winchester itself, which has significant constraints, and it is felt that housing should be distributed more evenly across the district, to support the facilities in smaller towns and villages and deliver affordable housing across the district.
- 1.26 Understanding the sustainability of smaller settlements such as Otterbourne, can and should be key in allocating appropriate sites to meet any unmet housing need and also in a bid to address the increased housing required under the SM update.

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

- 1.27 Through this response we maintain that the proposed spatial strategy is not considered to provide the most appropriate distribution of housing as it is too focused on Winchester Town and South Hampshire Urban Areas, neglecting to fully consider the potential that smaller sustainable towns and villages can offer. The Plan is also overly reliant on several strategic sites including the three 'strategic allocations' at West of Waterlooville, North Whiteley and North of Winchester which account for over 5,000 dwellings (c. 33% of the total requirement).
- 1.28 It is clear that there are various locations in Market Towns and Rural Areas which have been overlooked despite being suitable to deliver enhanced levels of growth. This is particularly apparent when considering sustainable locations such as Otterbourne, which is considered appropriate to deliver significantly more dwellings than are currently allocated to the settlement.
- 1.29 The SHELAA highlights examples of numerous sties which are considered to be potentially suitable for development and could indeed deliver the increased housing need, evidenced as a requirement across the district. Despite this, no higher growth figure was ever tested. The progressed Local Plan is too reliant on the strategy previously progressed in the last LP and does not appropriately consider alternative options to deliver the housing requirement or indeed further housing as appropriate to meet the evidenced increased need across the district.

1.30 As we have also clearly highlighted in our response to Matter 1, it is clear from the evidence available in terms of the unmet needs of the neighbouring authorities, alongside the unmet need for WCC based on the updated SM, that a higher growth target should have been considered and in not doing so, WCC has not appropriately tested alternative growth scenarios. Clearly WCC is not doing enough to meet a significant and evidenced housing need, despite being less constrained than neighbouring authorities and acknowledging that the supporting SHELAA also clearly shows there are further potential sites in sustainable locations which could be considered to meet this need.

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