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Examination of the Winchester District Local Plan 2020-2040

Hearing Statement by Land & Partners Ltd

Matter 2: Spatial strategy and distribution of development Policies SP1, SP2, SP3, H1, H2, H3, and E1 and E2 scheduled for Tues 22 April 2025 PM

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?

- 1.1 The assessment scores for the larger settlements in the Settlement Hierarchy Review (2024) show very little difference between the two Market Towns in the second tier of the settlement hierarchy and the Larger Rural Settlements in the third tier. The 'daily facilities' scores are very similar and it would seem to make more sense to group Bishop's Waltham (30), New Alresford (30), Whiteley (29), Wickham (26) and Denmead (25) in the same tier. This would cover the score range from 25 - 30.
- 1.2 Paragraph 77 of the NPPF is clear that the supply of large numbers of new homes can often be best achieved through planning for significant extensions to existing villages. So, in relation to current national policy a settlement hierarchy should consider the potential for settlements to accommodate development, taking account of whether they have the necessary infrastructure and facilities. Bishop's Waltham and New Alresford do have a slightly larger service base than Whiteley, Wickham and Denmead e.g. a library and bank, but they all have the same key services i.e. convenience store, post office, doctor, dentist, pre-school, primary school, high speed broadband, employment, facilities to congregate, outdoor sports, parks and play areas. This enables them to all function as service centres for surrounding villages, thus increasing accessibility across the rural area of the District. The concept of rural service centres serving a wider hinterland is missing from the Settlement Hierarchy Assessment which is surprising when it is a long-established principle for understanding rural sustainability.
- 1.3 Consequently, it is difficult to understand from the Settlement Hierarchy Assessment why the Council have put Bishop's Waltham and New Alresford into a higher tier than other service centres of similar size. There is no clear evidence that the settlements proposed for the second tier are materially more sustainable locations for new development than those proposed for the third



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tier, in terms of residents being able to access a significantly greater range of services and facilities without the need to travel by private car. Libraries and banks are becoming much less relevant to modern lifestyles with developments in information technology e.g. cheques for and bank can be deposited at post offices and people download/stream books and other content to their various electronic devices. Bishop's Waltham does not have a secondary school so that cannot be the critical factor which puts a settlement into a higher tier.

- 1.4 If there should be any critical factor for being in the second tier below the City of Winchester, having regard to paragraph 77 of the NPPF, it should be whether there is sufficient access to services and employment opportunities either in the settlement itself or in larger towns nearby. For example, Denmead sits very close to the part of the South Hampshire Urban Area centred on Portsmouth that stretches all the way through to Waterlooville nearby. This is where most of the jobs and higher order services are to supplement the key services in the village itself, including the Cowplain secondary school in Waterlooville. Whilst there is a strategic gap to stop visual coalescence, in functional terms Denmead is strongly integrated with the South Hampshire Urban Areas and the settlement hierarchy should recognise this.

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?

- 1.5 The amount of development proposed for the Market Towns and Rural Area (3,850 homes) is not justified anywhere in the Plan. The Sustainability Appraisal does not provide the reasoned justification either, as this is based on broad options with generalised conclusions. There is no comprehensive analysis of the social and economic needs of settlement, taking account of any environmental constraints that would prevent these needs being met.
- 1.6 Policy SP2 divides the District into three spatial areas with a new homes requirement for each yet provides no explanation for the apportionment of numbers. No reference is made to the amount each of the larger settlements in the District should grow in order to meet their local housing needs and support their service base to ensure the ongoing vitality and viability of communities. This conflicts with Paragraph 32 of the NPPF which states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. The spatial strategy should have considered the particular opportunities and constraints of each service centre in the rural parts of the District and use this evidence to apportion a number for the Market Towns and Rural Areas part of the District that would enable rural service centres to meet their particular social and economic needs. Each



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settlement in the Market Towns and Rural Area category needs to be able to fulfil its needs relative to its role and function and the strategy requires that most new development to be focused in or near to local service centres so that surrounding villages benefit.

- 1.7 The concentration of growth into service centres within the Market Towns and Rural Area of the adopted Local Plan was endorsed by the Inspector examining the Plan. Paragraph 109 of their report states:

“a target of about 250 new dwellings each for the other six named settlements would properly reflect past levels of development, recent population projections and public consultations through the Blueprint exercise, amongst other things, including the SHLAA. The revised policy would allow for some minor deviation above and below the target figure, according to relevant local circumstances. It would also provide the opportunity for limited expansion to help meet local needs, including supporting existing facilities and some economic/commercial growth, where appropriate, as well as providing for local families and the increasing numbers of elderly people to help retain a balance of population.”

- 1.8 In this context, the Council should have looked carefully at the rural areas for where growth can support services of wider benefit and avoid people having to travel into Winchester and other larger centres for services on a day-to-day basis. A rural service centre is able to provide a genuine alternative to travelling into the larger centres, other than for higher order services. The Local Plan should be looking at the evidence and reflecting the character, needs and opportunities of the rural parts of the Borough and take account of the particular circumstances so that planning policies play an active role in guiding development towards sustainable solutions as set out in Paragraph 9 of the NPPF. In particular, it should have had regard to the NPPF policy for rural housing which states in Paragraph 83:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. 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.”

- 1.9 Furthermore, Paragraph 77 of the NPPF suggest that significant extensions to villages and towns can often be the best way of achieving the supply of large numbers of new homes, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. This should ensure that their size and location will



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support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access.

- 1.10 All these factors should have been taken account of to arrive at a figure for the Market Towns and Rural Area.

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?

- 1.11 The phasing of development proposed in Policy H2 will not lead to an appropriate pattern of housing and economic growth. It will prevent the Neighbourhood Plan for Denmead from allocating any sites within the next five years; effectively creating a moratorium on new housing in this sustainable settlement. This is at odds with the change in national policy since the Regulation 19 Plan was submitted. The Government is now committed to building 1.5 million new homes by the end of the current parliamentary term and the thrust of Government policy is to speed up housing delivery.
- 1.12 The Plan spatial strategy is very reliant on the delivery of housing in three strategic sites: Newlands (West of Waterlooville), North Whiteley and Barton Farm. These which carry inherent risks of delays and infrastructure challenges whereas the sites which would be held back by Policy H2 would have been able to provide a much more robust and resilient strategy to deliver the required numbers over the next five years. The Local Housing Need resulting from the new Standard Method will require a step change in housing delivery, which Winchester Council is temporarily avoiding by submitting a Plan during the transitional arrangement period. The Council is storing up problems for the next Plan cycle by not facing up to the levels of growth needed to address the housing crisis. The many years it takes to wait for evidence of general delivery failure to get a site allocated in a Neighbourhood Plan (which has five years protection after being made) and only then get planning consent means that the social and economic harm from not meeting the identified Local Housing Need is being unnecessarily prolonged.
- 1.13 Of the 3,850 homes apportioned to the 'Market Towns and Rural Area' spatial area by Policy SP2 there is no reasoned justification in the Plan as to how these are distributed amongst the various settlements in Policies H2 and H3. It appears that insufficient attention has been paid to the role of service centres providing a focus for growth in the rural areas and instead the total is proposed to be spread fairly widely across the whole rural area, relying mainly on windfall and the building out of existing commitments. Such commitments are often the result of the previous Local Plan and will soon be completed,



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leaving little scope for growth in the rest of the Plan period. The windfall allowance of 1,725 in Table H3 on Page 220 will be of little benefit to the settlements in the rural area, where there is much less potential for recycling of employment land for residential development. The windfall allowance at Denmead of 50 homes in DEN1 is just not credible when considering the actual opportunities in practice.

- 1.14 The Local Plan should be looking at the evidence and reflecting the character, needs and opportunities of the rural parts of the Borough and take account of the particular circumstances so that planning policies play an active role in guiding development towards sustainable solutions as set out in Paragraph 9 of the NPPF. The Local Plan should consider the social and economic benefits of proportionate growth (i.e. appropriate to the size, function and role of each settlements) to sustain their service base over the Plan period as well as considering the costs of not doing so.
- 1.15 There appears to have been a deliberate intention to limit new housing sites to no more than about 100 dwellings for all settlements in the rural area, no matter what their potential is for new housing to enhance the sustainability of the settlement for the benefit of all residents e.g. achieving a critical mass to support new bus services of benefit to all residents. The amount of growth proposed is based on allowing 100 homes to each of the main rural services centres rather than looking closely at their social and economic needs and their particular environmental constraints.
- 1.16 There is no mention of Denmead in the Winchester Design Workshops Report of Workshop 3: Market Towns and Rural Villages (January 2022) which was intended to consider how positive change through development to improve outcomes for existing as well as new residents. This could have provided a basis for exploring how new housing can deliver a range of benefits for the existing community.
- 1.17 Denmead does not have the heritage constraints found in many other rural settlements and has ample room to consolidate its growth whilst avoiding the visual gap to Waterlooville. Its proximity to the South Downs National Park means that it is able to meet the needs of residents in the National Park that lack local services without the landscape harm that would result from housing growth within this protected landscape. At the same time, its location close to the urban area means that its CO2 emissions per capita are lower than those further away such as New Alresford, which display relatively high levels of CO2 emissions per capita from commuting as noted in paragraph 4.35 on page 121 of the final Integrated Impact Assessment Report (July 2024).