

**Winchester City Council
Winchester District Local Plan 2020-2040
Examination**

**Matter 2: Spatial strategy and distribution of
development Policies SP1, SP2, SP3, H1, H2, H3, and
E1 and E2**

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On Behalf of Macra Ltd
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Matter 2: Spatial strategy and distribution of development 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?*
 - 1.1 The settlement hierarchy is clear in the manner in which it has been formed and the assessment criteria as set out. We consider however that the sources of evidence from which the Council has made its judgements are limited in many cases to just within the plan area boundary; for example where this has been determined based on the 'Parish Facilities Audit 2022'. This therefore discounts services and facilities that are close by but located outside of the plan area boundary; particularly when consider settlements which are on the periphery of the plan area.
 - 1.2 It is also the case that the Council's assessment is flawed in several cases, Wickham for example is claimed not to have a petrol station, despite the presence of the Shell Garage within the midst of the settlement. It is also claimed not to have a daily bus service, when there are several regular hourly services, comprising Routes 20, and 69. The Council's evidence base is simply incorrect in this regard.
 - 1.3 Considering the settlement hierarchy, Wickham would therefore have scored 28, exceeding that of all other larger rural settlements with just the two changes above, but it could also have scored more than that. The settlement also has a defined high street, a community centre providing leisure opportunities and the parish includes the Ravenswood House Hospital. This is a highly sustainable location that could have been elevated as a market town relative to the other 'larger rural settlements'. The level of growth proposed for Wickham in particular is disproportionately low when compared with its sustainability and indeed its relationship with Welborne Garden Village. Welborne itself includes the provision of three primary schools, a secondary school, healthcare facilities and a leisure centre. In this respect, Wickham will have proximate links to all of these facilities and services within the 1.6km study area that the Council set out.
 - 1.4 We do not consider the distribution of growth to be appropriate or justified in this respect. Wickham in this regard should have been placed higher up within the settlement hierarchy.

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?*
 - 2.1 Whilst the broad allocation of housing to the more sustainable settlements is supported, we do not consider that this approach is correct or appropriate with respect to Wickham for the reasons set out and indeed the inaccuracies identified within the Council's evidence base, which would place the settlement at a higher tier and justify a different approach to growth for the settlement.
 - 2.2 Moreover, we also contend that the strategy as set out is not 'justified' on the basis of the Council's evidence base clearly substantiating other reasonable alternatives that could and should have reasonably been explored, and moreover, following the tests of reasonableness as established by the courts as the '*Reasonable Person Test*', an alternative conclusion could and should have been reached in respect of the strategy for Wickham settlement.
 - 2.3 We finally do not consider, as is discussed in detail further above, that the Council's approach as set out within the WDLP is in accordance with the NPPF in that it does not comprise sustainable development or properly plan for housing needs to be met in a manner which has enabled the spatial strategy to be appropriately shaped through engagement with local communities and statutory consultees.
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?*
 - 3.1 There is a very low overall percentage of the objectively assessed housing need actually proposed to be allocated as part of this development plan; comprising just 2,875 homes of the 15,115 need that the Council consider exists (19%). The remainder of the housing need is relied upon with respect to existing allocations or committed patterns of development or windfall delivery. Having regard for the range of opportunities available to the Council however we consider that there were other opportunities that could and should have been properly explored to ensure an appropriate pattern of housing and economic growth across the district.
4. *Have settlement boundaries been defined in accordance with a clear and easily understood methodology that is consistently applied?*
 - 4.1 We have concerns that the approach proposed to settlement boundaries does not provide sufficient or appropriate opportunity for windfall development allowances to be delivered upon in order to meet the assessed housing needs of the district in full.
 - 4.2 Whilst there are historic windfall delivery rates, this does not mean this is achievable in all settlements, and indeed a more appropriate manner to ensure

the objectively assessed needs for development are met would be to allocate the homes required through the identification of specific development sites. Further reliance is therefore currently placed on housing coming forwards in an unplanned manner which provides no certainty and having regard for the Government's direction to meet housing needs in full, this is in our view unnecessary and unjustified.

5. *Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?*
 - 5.1 We do not consider that the Council has appropriately had regard for the opportunity present for growth at Wickham, having regard for its relationship with Welborne Garden Village and to deliver a well-considered urban area which enables significant connectivity between the communities to share services and facilities and reduce the need to travel by private vehicle, that could have been readily facilitated.
 - 5.2 This is a clear and realistic opportunity that could enable the delivery of wider sustainability benefits and the Council have not given due consideration or weight to this option.
 - 5.3 It is also clear that, having regard to the five options scoped out within the IIA, that a higher growth option, which seeks to address affordability issues and the shortfall in affordable housing delivery, alongside providing certainty that the objectively assessed need would be met, could, and we would argue should, have been considered.
6. *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?*
 - 6.1 The proposed spatial strategy accounts for affordability in so far as is dealt with by way of the previous standard methodology. The standard method calculation is however the starting point and indeed consideration should have been to whether an uplift on the housing need should have been included to address more broadly the matter of affordability and affordable housing needs.
 - 6.2 There is no evidence that this point has been specifically addressed by the Council within the evidence base. Indeed at Paragraph 2.9 of the SHMA (July 2024), it is stated:

"Despite some minor improvement in affordability since 2021, the District remains significantly less affordable when compared to Hampshire County and the South East region. This points to the existence of affordability pressures in the District, resulting in difficulties in younger households and those with limited savings in their ability to buy homes."

- 6.3 This position is further reinforced at Paragraph 2.10, and again at 2.12 whereby ICENI confirm that the rate of affordable housing delivery, whilst having seen some improvement since 2018/2019:

“Has shown no immediate or significant effect on affordability within Winchester District”

- 6.4 In concluding on this issue within the SHMA, ICENI speak with respect to Winchester, but a similar consideration applies to the plan area generally:

“Affordability has improved slightly; however, Winchester remains significantly less affordable overall when compared to the County, Region, and Country as of 2023, with a tight rental market adding to affordability pressures in the City.”

- 6.5 It is also noted that the SHMA concludes that there is a need for affordable housing within the plan area of 411 homes per annum. This represents 60% of the overall housing need of 676 homes per annum which the Council is proposing to provide for. On the basis that Policy H6 sets the affordable housing requirement from developments at between 25% and 40% depending on the circumstances, there is no manner in which this need will be met. In the best case scenario that all sites provide 40% affordable housing, this would deliver approximately 276 affordable homes per annum. There will however be many sites on which affordable housing is not delivered at all due to their size, viability considerations or otherwise. It would have been appropriate to have regard for whether an uplift should have been introduced to address affordability and as a result seek to allocated a greater level of growth within the plan area. This is not a scenario which was tested within the IIA.