

The background of the page is composed of several overlapping geometric shapes in various shades of green and grey. A large, bright green triangle points downwards from the top right. Other shapes in darker greens and greys overlap it and each other, creating a complex, layered effect.

Winchester District Local Plan Examination

Matter 2: Spatial strategy and distribution of development

ON BEHALF OF ST PHILIPS LAND

April 2025

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?

1. No.
2. It is accepted that a scoring system is necessary in order to assess the relative sustainability of settlements, but any scoring system also needs to be supported by an element of qualitative assessment and consideration to ensure that it, as accurately as possible, reflects the position on the ground.
3. Unfortunately, the scoring system that has been used by the Council is a simple yes/no as to whether a particular service or facility is present in a settlement. This approach fails to account for the specific locational context of each settlement and ignores what facilities may be accessible in neighbouring settlements within a reasonable walking or cycling distance, or whether the individual characteristics of a settlement are such that more development could sustainably accommodated.
4. By way of example, in the case of Otterbourne, the Council's Settlement Hierarchy Review 2024 gives the settlement a score of 18 and, as a consequence, Otterbourne is characterised as an 'Intermediate Rural Settlement'. This is the lowest scoring of the categories (scoring between 18 and 21) against which the Submission Plan proposes housing allocations, albeit no indicative scale of housing is set in the Submission Plan for this category. The next defined category is 'Larger Rural Settlements', those settlements receiving a score of 22-26 points, which are allocated approximately 90-100 dwellings in the Submission Plan.
5. The only "daily facilities/services" which are not contained within Otterbourne itself are a pre-school and main line train station. Importantly, however, these facilities are available within the directly adjacent settlements of Otterbourne Hill and Shawford, that provide a pre-school and main line train station respectively. The pre-school is just 800 metres south of Otterbourne accessed using direct cycle and footpath links, and a train station is just 3.0km away, a reasonable distance by cycle. The i-Transport Facilities Plan, provided as **Appendix 1**, demonstrates the sustainable access of Otterbourne to everyday services and facilities.
6. This means that all "daily facilities/services" would be available and accessible to residents of Otterbourne. As such, any development within Otterbourne would not need to rely on car travel to meet daily needs.
7. Reflecting the above would mean that Otterbourne would score a further 4 points, using the Council's methodology, taking it to a total of 22 points. This would, again using the Council's methodology, change its categorisation in the hierarchy to that of a 'Larger Rural Settlement' rather than the lower 'Intermediate Rural Settlement'. As stated in paragraph 9.28 of the Submission Plan, this higher category of settlement is proposed by the Council to accommodate larger allocations.
8. The Hierarchy Review scoring outcomes have been implemented rigidly in the Submission Plan, despite the Review itself acknowledging its own limitations (paragraph 5.2). As a result, the proposed allocation strategy places too great a reliance on less sustainable settlements, and not enough development is provided in more sustainable ones, such as Otterbourne. This approach is not justified and is contrary to the objective of the Framework 2023 (paragraph 109)

to focus significant development on locations which are or can be made sustainable, through limiting the need for travel and offering a genuine choice of transport modes.

Is the distribution of development between the tiers of settlements justified and how has it been established?

9. No.
10. With specific regard to the Market Towns and Rural Area, the Submission Plan provides for a total of 3,825 dwellings broken down as follows:
 - Market Towns (1,375 dwellings)
 - Larger Rural Settlements (1,570 dwellings)
 - Intermediate Rural Settlements (360 dwellings)
 - Remaining Rural Areas (520 dwellings).
11. The Council's Integrated Impact Assessment Report (July 2024) ("IIA") attempts to set out how the distribution of development between the settlement tiers has been developed, but whilst logically concluding that the Intermediate Rural Settlements should be expected to provide less housing than Larger Rural Settlements, it fails to identify how the apportionment of development was expressly determined.
12. Paragraph 9.28 of the supporting text to Policy H3 provides a breakdown as to the general level of development that would be expected in each tier of the settlement hierarchy based on settlement assessments that have been undertaken by the Council. This paragraph goes on to state that:

"The more sustainable 'market towns' have a higher overall housing provision with new allocations for an additional approximately 100 dwellings each. At the next level, the larger rural settlements, generally require new allocations of 90-100 dwellings each. The smaller 'intermediate' rural settlements have modest housing provision, as they do not benefit from significant commitments or completions."
13. However, from the IIA and the other supporting elements of the Council's evidence base it is unclear why, with reference to the hierarchy of settlements, both Market Towns and Larger Rural Settlements have been allocated approximately 100 dwellings and 90-100 dwellings each respectively i.e. the same level of housing, whilst no specific allocation split is made for Intermediate Rural Settlements. The justification in paragraph 9.28 is that these settlements have modest housing provision going forward on the basis of modest commitments or completions previously.
14. With specific regard to the Intermediate Rural Settlements, this is not considered to be a justified or sound position as it does not account for the relative sustainability of the settlements within this category, or account for what is actually needed in any settlement – it simply replicates what has previously happened.

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?

15. We have no specific concerns about the overarching spatial strategy i.e. the three defined spatial areas of Winchester Town, South Hampshire Urban Areas, and the Market Towns and Rural Area (MTRA). This approach is considered logical given the characteristics of Winchester District, and is reflective of the evidence presented.
16. However, as set out in response to other questions relating to Matter 2, we do not consider that the settlement hierarchy and the quantum of homes apportioned to the spatial areas, and specifically the MTRA, is sound. For example, no evidence has been presented to demonstrate that the reasonable alternative of the MTRA sustainably delivering an increased level of housing growth, and therefore an increased level of housing overall for the Plan, has been robustly considered.

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?

17. No.

18. As we set out in our representations at the Regulation 19 stage consultation, we are aware that for Otterbourne (currently defined as an Intermediate Rural Settlement), Otterbourne Parish Council was asked by the Council to consider where some 50-60 dwellings could be accommodated. The Parish Council, in 2022, undertook a consultation exercise on this basis with the known SHELAA sites in the parish being considered. However, the justification for the Council's limitation of growth to just 50-60 dwellings is wholly unclear. The Council's 'Development Strategy and Site Selection Topic Paper' (2024) simply states, at paragraph 6.40, that *"it is considered appropriate to identify a new site to deliver about 55 dwellings."* No other explanation is provided.

19. This is particularly concerning when the results of the Council's own SHELAA confirm that there are 9 theoretically deliverable sites in Otterbourne Parish, with a combined yield of approximately 735 dwellings. Whilst it is appreciated that this full quantum of development, and the location of some of these sites separate from the main developed area of the village, will not be appropriate for a settlement of Otterbourne's size, there is no evidence to suggest that the Council actually considered what level of growth might be appropriate for Otterbourne having regard to its current level of sustainability and its future needs or, the locational benefits of Otterbourne in the southern part of the district and with the potential to contribute more to meeting wider unmet needs of the south Hampshire area.

20. The Council's limitation of development at Otterbourne to 'About 50-60 dwellings' appears to have been predetermined and under-estimates the ability of that settlement to deliver sustainable growth to assist in meeting the needs of Winchester and the wider south Hampshire area.

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

21. No.

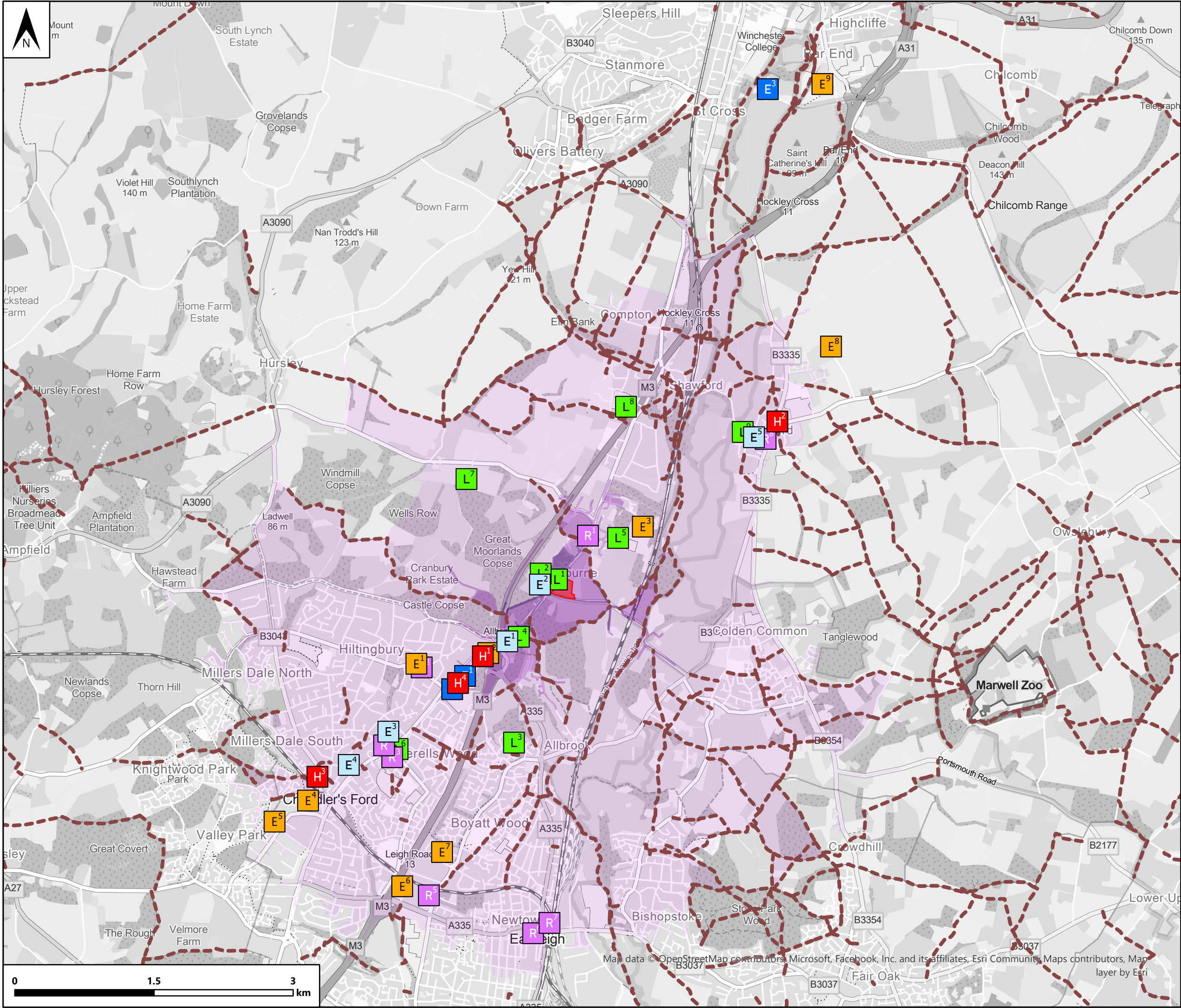
22. The Council has not considered the option of fully exploring what contribution individual market towns and rural settlements can actually deliver sustainably, or what the settlements and communities within them need to sustain them. Instead, an apparently predetermined, and therefore constrained, quantum of housing has been proposed in the MTRA. This does not reflect the requirement set in the NPPF, at paragraph 16, for plans to *"be prepared positively, in a way that is aspirational but deliverable."*

23. Whilst we do not object to the production and application of a settlement hierarchy to guide a sustainable distribution of development, this is dependent upon:

- i. the methodology for settlement characterisation being robust;
- ii. the level of growth being considered for each category being robustly determined and evidenced, and not just being based on historic trends; and
- iii. the Council then, in the light of i. and ii., undertaking a considered review based on the specifics of each settlement, particularly where its own SHELAA identifies a much greater level of deliverable and developable sites.

24. Against this background, we consider that the Council's approach to the MTRA is unsound and under-estimates the level of housing that can sustainably be accommodated in some locations, such as Otterbourne.

Appendix 1 – i-Transport Facilities Plan



Key

Site Boundary

5km Cycling Catchment

1.5km Walking Catchment

800m Walking Catchment

Hampshire Public Rights of Way

H¹ Nuffield Health Wessex Hospital

H² Twyford Surgery (GP)

H³ Park & Francis Surgery (GP)

H⁴ Winchester GP

E¹ Bright Horizons Nursery & Preschool

E² Otterbourne C of E Primary School

E³ Merton Junior School

E⁴ Chandlers Ford Infant School

E⁵ Twyford C of E Primary School

E¹ Thornden Secondary School

E² Lakeside SEMH School

E³ Winchester College

R¹ Nisa Local

R² Hiltingbury Stores

R³ Waitrose

R⁴ Co-Op

R⁵ Cannons Retail Park

R⁶ Sainsbury's

R⁷ Lidl

R⁸ Twyford High Street

L¹ The White Horse

L² Otterbourne Village Hall

L³ Allbrook Knoll Play Area

L⁴ The Otter

L⁵ Oakwood Park Recreation Ground

L⁶ Chandlers Ford Library

L⁷ Otterbourne Golf Course

L⁸ Compton & Shawford Tennis Club

L⁹ Twyford Social Club

E¹ Hiltingbury Road Retail Stores

E² Nuffield Health Wessex Hospital

E³ Southern House Offices

E⁴ Omega Enterprise Park

E⁵ Monks Brook Industrial Park

E⁶ M3 Trade Park

E⁷ Boyatt Wood Industrial Estate

E⁸ Hazeley Enterprise Park

E⁹ Bar End Industrial Estate

Source: HCC OpenData

Contains OS data © Crown copyright and database right 2022
Contains public sector information licensed under the
Open Government Licence v3.0

**The Square, Basing View,
Basingstoke, Hampshire, RG21 4EB**

Tel: 01256 637940

www.i-transport.co.uk

Title: **Facilities Plan**

Project: **Land at Park Farm, Otterbourne**

Project Number: ITB18177	Figure Number: Figure 1	Revision: A
------------------------------------	-----------------------------------	-----------------------

Nexus Planning

Suite 2, 3rd Floor
Apex Plaza
3 Forbury Road
Reading, RG1 1AX

T 0118 214 9340

nexusplanning.co.uk