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Winchester District Local Plan

Winchester City Council Local Plan Examination

Hearing Statement Matter 2:

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

April 2025



Winchester
City Council

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?

WCC response:

- 1.1 The Settlement Hierarchy has been produced and updated throughout the course of the Plan production. Paragraphs 3.1 to 3.7 of the Settlement Hierarchy Review (August 2024) ([DS01](#)) set out how a hierarchy was prepared and informed the production of the adopted Local Plan Part 1. The document then explains how the methodology was reviewed to ensure that appropriate settlements were included (paras. 4.2 to 4.4); to consider the scope and nature of the assessment, including the services assessed and relative weighting (paras. 4.5 to 4.9); and undertake an assessment of the presence of facilities (paras. 4.10 to 4.13).
- 1.2 The Hierarchy has gone through a number of iterations through the production of the Plan taking on feedback that has been received as part of the Plan-making process. A Background Paper was published in 2021 to accompany the Strategic Issues and Priorities Document. Responses to that Hierarchy were considered. This resulted in changes being made to the methodology which were included in the version of the Settlement Hierarchy which was published in 2022. These were the removal of access to mains gas and wastewater from the list of services included in the assessment, a reduction in weighting given to secondary schools, and the addition of a potential further score for more than one employment opportunity – to focus on measures which can reduce reliance on the private car. In addition, the 2022 document updated the presence of facilities in each settlement.
- 1.3 The 2022 document was published in support of the Regulation 18 draft Local Plan and representations were received. Responses were received covering the methodology, qualitative issues with scoring of facilities, the presence of facilities, whether other factors should be taken into account when categorising settlements, concerns over inconsistencies and those seeking the recategorisation of certain settlements. These points were summarised and responded to in the document Local Plan Regulation 18 responses regarding the Settlement Hierarchy ([RP15](#)) which is linked in the Regulation 22 Statement of Consultation Part 1 (November 2024) ([SD07a](#)) document (page 49) alongside other evidence base and local plan policy responses. Where appropriate, changes were made to the scoring and categorisation of settlements as set out in the Settlement Hierarchy Review (August 2024) ([DS01](#)).
- 1.4 Responses were received to the Regulation 19 consultation regarding the hierarchy and they are set out on pages 165 and 166 of the Regulation 22 Statement of Consultation Part 2 ([SD07b](#)). These do not raise matters that warrant a further change to the hierarchy.

- 1.5 Overall, it is considered that the settlement hierarchy is a robust piece of evidence to inform the Local Plan. It continues the approach to the categorisation of settlements followed in previous adopted local plans and while there have been some movements in the hierarchy, the scores are considered a reasonable reflection of the level of services and facilities present. The methodology and scorings have been reassessed throughout the process in light of comments received and changes have been made where considered necessary. Overall, it is considered that this iterative process has resulted in a more robust methodology and scoring that has helped to inform site allocations that have been included in the Local Plan. It is acknowledged that objections have been raised regarding some aspects of the scoring, in particular where facilities should be recorded as present in certain settlements, but the methodology and presence of facilities has been checked and is considered both reasonable and accurate.
- 1.6 Crucially, the categorisation of settlements is considered to be justified and robust as it does provide an appropriate differentiation between settlements with more or fewer facilities, which is then reflected in the development strategy and distribution of development. The approach that has been taken to identify the distribution of development has been outlined in paragraphs 9.27 – 9.28 of the Local Plan. This identifies that Winchester Town is the most sustainable settlement in the district and there are a number of market towns and rural areas which contain a number of settlements which are all of varying size and have a different range of services and facilities. The more 'sustainable' market towns have a higher housing requirement (an additional 100 – 120 dwellings), the larger rural settlements have new site allocations of around 90-100 dwellings and the smaller intermediate have more modest site allocations. Whilst it should be noted that the distribution of development between the tiers of settlements was initially informed by the settlement hierarchy it has also been informed by a number of other factors and evidence including the availability of land for development (informed by the SHELAA and an initial site visit to each settlement prior to allocating the settlement a housing allocation) and the Integrated Impact Assessment of the emerging strategy.

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?

WCC response:

- 1.7 Policy SP2 summarises the spatial strategy of the Plan, drawing together key elements of the Local Plan vision and allocations for each of the identified sub-areas as well as setting out plan-wide aims and requirements.
- 1.8 The spatial strategy is set out with reference to three broad plan areas – Winchester Town, the South Hampshire Urban Areas, the Market Towns and Rural Areas. These three areas were identified in the adopted Local Plan Part

1 ([LP01](#)) in recognition of their different roles and characteristics. This remains the case, taking account of updated evidence and consultation, as described in paragraph 3.1 of the Proposed Submission Local Plan (Regulation 19) ([SD01](#)). The three broad areas were used in the Strategic Issues and Priorities consultation ([CON05](#)) (page 11) and subsequent iterations of the Plan published under regulation 18 and 19, and the consultation responses to those have not raised any significant concerns that the identified areas do not remain relevant for purposes of plan-making.

- 1.9 The distribution of development has been developed and tested over the course of the production of the plan as set out in paragraphs 3.45 to 3.56 of the Soundness and Legal Compliance Statement ([SD15](#)). The SIP consultation outlined various options for housing development with reference to the three sub areas, with the preferred hybrid option being taken forward with reference to an evidence base, consultation responses and Integrated Impact Assessment.
- 1.10 The Settlement Hierarchy is considered to be an appropriate approach, justified by the evidence and results of consultation. It is largely a continuation of the work previously undertaken in the production of the adopted Local Plan, and has been subject to a process of review and refinement as set out in the Settlement Hierarchy Review (August 2024) ([DS01](#)). The methodology and presence of facilities has been checked and refined as set out in the document Local Plan Regulation 18 responses regarding the Settlement Hierarchy ([RP15](#)). It is acknowledged that objections remain, as set out in pages 63 to 78 of the document Details of Reg19 representations (Feb 25) – Evidence Base ([ED11z](#)) and summarised on pages 165 and 166 of the Regulation 22 Statement of Consultation Part 2 (November 2024) ([SD07b](#)). However, the matters they raise are largely qualitative, such as the weighting of facilities and whether certain services should be counted (for instance due to size of facility or frequency of service). Factual information regarding the presence of various facilities and services has been checked and corrected where necessary. Overall, it is considered the Settlement Hierarchy has been through extensive public consultation and review and the evidence supporting it is proportionate.
- 1.11 Strategic Policy SP2 is justified by an extensive evidence base. Paragraphs 3.57 to 3.59 of the Soundness and Legal Compliance Statement ([SD15](#)) set out how the evidence base has developed as necessary throughout the preparation of the Plan. This has included new and updated studies such as the Nutrient Neutrality Study, SFRA Part 2 and Strategic Transport Study.
- 1.12 The Plan strategy has been prepared with reference to reasonable alternatives. Paragraphs 3.47 to 3.48 of the Soundness and Legal Compliance Statement ([SD15](#)) set out how four alternatives were identified in the SIP and a hybrid option taken forward to the Regulation 18 draft Local Plan.

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?

WCC response:

1.13 Yes. The Development Strategy and Site Selection Background Paper ([SD10b](#)) sets out how the distribution of development was informed by the availability of land suitable for allocation within and adjacent to each settlement (paragraph 5.2 and on), the settlement hierarchy (paragraphs 4.1, 4.3 and 6.1 and on) and the IIA (paragraphs 5.1 and 5.4 and on). The resulting strategy has been tested through the outcomes of other relevant evidence including the Strategic Flood Risk Assessment, Strategic Transport Assessment and Infrastructure Delivery Plan and Habitats Regulations Assessment. None of those studies has indicated any significant concerns or impacts arising from the proposed distribution of housing and other development. The final proposed distribution of housing and other development has been appraised in the Integrated Impact Assessment (Primarily in Policies SP2, E2 and H3) to consider the sustainability impacts and this has resulted in a distribution which is appropriate for the Plan area.

4. Have settlement boundaries been defined in accordance with a clear and easily understood methodology that is consistently applied?

WCC response:

1.14 Yes. The changes to the Policies Map document ([SD05](#)) clearly sets out the amendments to settlement boundaries, illustrating both the current and proposed boundaries. In assessing potential site allocations in the larger settlements, consideration was given to the scope for minor changes to settlement boundaries to allow for the development of sites that were suitable for development but too small for allocation (e.g. as proposed at South Wonston). Settlement boundaries were also checked in terms of whether they required updating due to recent or proposed development. The methodology towards the amendments to the settlement boundaries on the Policies Map is that new site allocations have been included within the settlement boundary. The only exceptions to this approach are the Major Development Areas from the adopted Local Plan that have been carried forward to this Local Plan (Barton Farm, West of Waterloooville, and Whitely) and the new site allocation at the SJM Barracks sites. These major development areas and the SJM Barracks have not been included within the settlement boundary yet as the disposition and exact location of uses/development is not yet fixed. The Policies Map document (SD05) further illustrates these boundary adjustments, providing transparency in how they have been defined. With the exception of the South Wonston settlement boundary, adjustment discussed under Matter 8, all changes have been made to accommodate allocated development within those settlements.

- 1.15 Therefore, the settlement boundaries have been defined against a clear, easily understood and NPPF-compliant methodology which has been consistently applied.

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

WCC response:

- 1.16 Yes, the Development Strategy and Site Selection Background Paper ([SD10b](#)) outlines the process undertaken to consider the distribution of development. Pages 36 to 38 of the Strategic Issues and Priorities (SIP) consultation document ([CON05](#)) sets out the four options for a development strategy which were developed for consultation which were tested through the Integrated Impact Assessment ([IIA09](#)). The consultation document (pages 39-54) contained a description of the advantages and disadvantages for each option, along with a summary of the sustainability appraisal findings for each.
- 1.17 In the consultation responses to the SIP, there were a number of other alternative housing distribution options that were put forward in the representations. This included an option for concentrating development on brownfield land and not allocating sites on greenfield land and that there should have been an option which included higher housing numbers. However, it is important to point out that there could be any number of different alternative housing numbers or distribution options. Testing four alternative housing distribution options in SIP was considered to be a reasonable and robust approach – please see paragraphs below about how the results of the public consultation resulted in the city council taking forward a hybrid option.
- 1.18 The outcomes of that SIP consultation, along with the initial sustainability appraisal of each of the growth options were taken into account in the report to Local Plan Advisory Group (LPAG), which at that time was the Council's committee to consider matters relating to the emerging Local Plan, on 27 September 2021 ([RP14](#)).
- 1.19 The report concluded that Approach 3 should be rejected, and that "Approach 1 received the most support and performs well in terms of its potential to support existing settlements, use brownfield sites and reduce the need to travel. It is likely to need adjustment to add elements of Approaches 2 and 4, which were also fairly well-supported" (para. 3.35). A hybrid option, based upon approach 1 but with elements of 2 and 4, was developed. This was subjected to initial testing through further consideration of the Settlement Hierarchy; the availability of suitable, sustainable sites for allocation in each settlement; the presence of any "showstoppers" or constraints, for development; the initial sustainability appraisal of potential allocations in each settlement; and discussions with town and parish councils. Together this further refined the emerging strategy to that presented and discussed at LPAG and Scrutiny Committee at their combined

meeting of 29 September 2022 ([RP16](#)), resulting in the regulation 18 draft Local Plan's proposed housing distribution.

1.20 The Regulation 18 draft Local Plan took forward the findings from the SIP public consultation and was published for consultation in November 2022, alongside an Integrated Impact Assessment and evidence base include amongst other matters the Strategic Housing Land Availability Assessment, Settlement Hierarchy and Development Strategy and Site Selection Background Paper. Following the publication of the Regulation 18 draft Local Plan, a number of responses were made which questioned the development strategy, and in particular the total quantum and location of development. As outlined on pages 44 to 49 of the Regulation 22 Statement of Consultation ([SD07a](#)), detailed summaries of the responses made to the Regulation 18 draft Local Plan were prepared for matters including Policy SP2 - Spatial Strategy and Development Principles, Omission Sites, the Settlement Hierarchy and the Development Strategy and Site Selection Background Paper, all of which refer to the consideration of matters which had the potential to result in alternative distribution of development. Having considered the responses to these and other matters, the Proposed Submission Local Plan (Regulation 19) set out a development strategy broadly which was similar to that in the Regulation 18 draft Local Plan, with changes largely arising from an evolving understanding of the opportunities presented in each site and settlement.

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?

WCC response:

1.21 Yes, throughout the process of preparing the Local Plan the city council has considered the contribution that brownfield land can make towards meeting the housing requirement. The Strategic Housing Land and Economic Availability Assessment (SHELAA), published in 2021 and updated in 2023 sets out conclusions of the Council's assessment of the capacity of suitable and available brownfield/greenfield sites.

1.22 The Proposed Submission Local Plan (Regulation 19) includes the release of WCC car parking sites in Winchester Town (Policy W3 – St Peter's car park and Policy W8 Station Approach) for development which would come forward for redevelopment when the additional Park and Ride facilities at SJM Barracks (Policy W2) come online. Other brownfield land sites such as Central Winchester Regeneration (Policy W7) and Bar End Depot (Policy W9), which are also owned by the city council, prioritise the redevelopment of brownfield land. Allied to this Policy H2 (Housing Phasing and Supply) has held back greenfield sites until later parts of the Plan period (post 2030) so as to help prioritise previously developed land.

- 1.23 Whilst the city council has prioritised brownfield land, in accordance with NPPF paragraph 123 and in order to achieve the government's standard method, greenfield land has been allocated for development as there are simply not enough brownfield land sites in the district to meet the government's housing requirements.
- 1.24 A Local Plan Viability Assessment has been undertaken alongside the development of the Local Plan (LPV01 – LPV18). The findings from the Local Plan Viability Assessment have directly informed the wording of Policy H6 (affordable housing) as it has assessed the differences in development costs between greenfield and previously developed land sites, the need for Biodiversity Net Gain and the costs that are associated with nutrients. In view of this, the city council believes that the Local Plan has struck the right balance between the need for development across brownfield and greenfield sites and any related impact on housing affordability.