

**Winchester District Local Plan 2020-  
2040**

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

**Prepared by**



Prepared on behalf of Croudace Homes Ltd

March 2025

Ref: WIN-2015-AD

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## 1.0 [Introduction](#)

- 1.1 This statement has been prepared by Southern Planning Practice Ltd on behalf of Croudace Homes Ltd who has an interest on Land at Southwick Road, Wickham which is allocated under Policy WK6 of the submission version of the Local Plan as well as adjoining land. Croudace Homes Limited is also promoting SHELAA site CC03 and CC03b Land East of Highbridge Road, Colden Common.
- 1.2 It is pertinent to note that representations have been made on behalf of our client, Croudace Homes Ltd, throughout the preparation of the emerging Local Plan. Whilst this statement is not a duplication of the contents of representations previously submitted to the emerging Local Plan, this statement draws on previous responses where necessary. This statement should be read alongside our Regulation 19 representation as well as the separate hearing statements submitted on behalf of Croudace Homes.
- 1.3 Due consideration has been given to the Inspectors' Matters, Issues and Questions on the relevant published examination material available on Winchester City Council's examination webpage, all of which has informed this statement.
- 1.4 This Examination Statement is prepared in response to the Inspectors' Matters, Issues and Questions – Matter 2 - Spatial strategy and distribution of development Policies SP1, SP2, SP3, H1, H2, H3, and E1 and E2. In addition to this Examination Statement, several other statements have been prepared in response to other matters being heard in the Local Plan Examination; where there is cross over between these matters, we have sought to cross refer rather than repeat comments.
- 1.5 This statement focuses on the overall development strategy proposed in the Local Plan and therefore primarily responds to questions 1, 2, 3, 5 and 6 of the Inspectors' Matters, Issues and Questions set out under Matter 2.

## 2.0 Response to Inspectors' Questions

***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?***

- 2.1 After a review of the Settlement Hierarchy Review (2024), we believe that the methodology used in the Settlement Hierarchy Review (2024) is robust and the outcomes are accurate. The Facility Scoring Methodology utilised in the review is supported and the resultant hierarchy of settlements is considered to be accurate based on the findings.
- 2.2 With regards to the distribution of development between the tiers of settlements identified in the hierarchy, we believe that the Local Plan has distributed development appropriately. However, it is considered that some of the more sustainable settlements, namely the larger rural settlements which rank highly in the Facility Scoring Methodology, such as Wickham and Colden Common, could take further development over the plan period. It is pertinent to note that Wickham scored 26 in the Settlement Hierarchy Review (2024) and Colden Common, 23, this is only 4 and 7 points (respectively) below the Market Towns of Bishops Waltham and New Alresford which have additional facilities and services due to their size.
- 2.3 Allocating further sites in the sustainable settlement of Wickham, and other high ranking sustainable settlements, such as Colden Common, would enable the Council to bolster its housing land supply further in light of the recent changes to the standard method which resulted in a substantial increase in housing figures. This would also ensure that the Local Plan is assisting in achieving the Government's ambitions to significantly boost housing delivery.

**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?***

2.4 Strategic policy SP2 sets out the spatial strategy to deliver new housing, economic growth and diversification. The spatial strategy identifies three spatial areas for which it sets out a development strategy for each. The two key areas identified for growth in the plan period are Winchester town and the South Hampshire urban areas, each area is identified to make provision for 5,640 homes and 5,650 homes respectively. The third spatial area, market towns and rural area, is identified to make provision for 3,850 homes over the plan period.

2.5 Whilst we supportive of the Council's strategy and in particular, the fact that it is making provision for 3,850 homes within the market towns and rural area. However, as highlighted in our representations to the Regulation 19 Consultation, this spatial area covers a very large physical area of the district, and we therefore believe that the Council should be more ambitious in its housing numbers to fulfil both the housing needs of the district and meet any unmet need arising from neighbouring local authorities. Please refer to Matter Statement 4 submitted on behalf of Croudace Homes Ltd, which reviews the housing need of the district in detail.

2.6 Notwithstanding the above comments, the spatial strategy and settlement hierarchy is considered to be justified and an appropriate strategy for new development in the area.

**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?***

2.7 We believe the proposed distribution of housing has been carefully informed by the SHELAA and other documents within the Local Plan evidence base and appropriately distributed in respect of the settlement hierarchy set out in Policy SP2. Whilst we believe the distribution of development will lead to an appropriate pattern of housing and economic growth, we

encourage the Council to seek to allocate further homes appropriately in accordance with the identified settlement hierarchy.

- 2.8 With specific regard to the sites in Wickham, we believe that the proposed allocations will lead to an appropriate pattern of housing over the plan period whilst providing a new population within walking and cycling distance of a range of services and facilities which will support the longevity of these and encourage economic growth. As expressed in our Regulation 19 representations, there are further opportunities for additional new residential development adjacent to the land allocated by Policy WK6 should further sites be required to assist the Council in providing a sufficient supply of homes to meet local needs.
- 2.9 There is, however, concern for the distribution of housing in Colden Common, particularly in relation to the continued allocation of Site CCI Clayfield Park. This is a site is carried forward from the Winchester District Local Plan Part 2 but still has an active business on site. There is a lack of evidence that suggests that it will deliver the allocated housing in the required timescales. It is the largest allocation in Colden Common.
- 2.10 If Site CCI Clayfield Park continued to be allocated without sufficient confidence of its delivery, the plan would fail to deliver an appropriate pattern of housing or deliver the resulting economic growth. It is suggested that other sites, such as Land East of Highbridge Road (SHELAA site CCO3) should be allocated in Colden Common to ensure an appropriate pattern of development.
- 2.11 Overall, we do support the Council's aims for the spatial strategy and proposed policies to seek to support and enable appropriate development in different tier settlements of the district. The spatial strategy and policies aim to meet local needs whilst ensuring that new development does not conflict with the policies which aim to respect the environment whilst creating sustainable extensions to settlements and stimulating economic growth.



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

- 2.12 Whilst we are supportive of the proposed allocations within the Local Plan, and believe that in most cases, realistic options for the distribution of development within the district have been identified, we consider that there are further sites, which should be explored to assist in the delivery of a robust housing land supply over the plan period. One such example, is the Land at Southwick Road/School Road. Whilst the allocation of the westernmost section of the land at Southwick Road is supported, it is considered that Wickham is a sustainable settlement, which is geographically well located in the Partnership for South Hampshire (PfSH) area to accommodate unmet need arising from neighbouring authorities and which is capable of accommodating further development over the plan period. It is highlighted that there is additional land to the east and north of the site allocated by Policy WK6 which would be suitable for allocation if required.
- 2.13 Croudace are promoting Land East of Highbridge Road, Colden Common (SHELAA CC03). It scored well in the SA/IIA and was short listed for further consideration by Colden Common Parish Council, who did not select it as preferred site in their response back to Winchester City Council. In their statement in regards of Matter 5 Site Allocation Methodology, Croudace explain why they disagree with WCC's approach and as a result cannot agree that all realistic options for distribution of development is robustly justified in the Plan. Furthermore, as set out in answer to Question 4, WCC has allocated a site is unsupported by evidence for delivery during the plan period and is therefore not a realistic option.
- 2.14 It is also pertinent to note that whilst the distribution of development across the district may be considered appropriate, there are sites in some of the settlements which have been allocated over more sustainable, available sites as evidenced above. Some sites which have not been allocated, have a more realistic prospect of coming forward over the plan period and therefore it is considered that such sites should be considered for allocation. Further, some of the sites in the Local Plan have been carried over from the current Local Plan, which

whilst in some cases may be appropriate, it is considered that some of these sites are not likely to come forward and be built out in the plan period. It is urged that the Council considers other alternative, *deliverable* sites to ensure all realistic options for the distribution of development within the district have been identified and considered robustly in the formulation of the Plan.

**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***

- 2.15 We believe that the spatial strategy set out in the Plan does allow for both brownfield and greenfield sites to accommodate new development, however it is considered that given the track record of delivery of some of the complex brownfield sites within the district, these should only be prioritised if there is a realistic prospect of delivery in the early years of the plan period.
- 2.16 Whilst several greenfield sites have been allocated in the Local Plan, it is considered that there are further greenfield sites in sustainable locations which are available and may be more suitable than some of the allocated brownfield sites due to their constraints and complexities which present an issue, or a delay to their development.
- 2.17 Further, the clause in the site allocation policies which does not allow for any new development on greenfield sites to come forward before 2030 is of a concern and we believe that this will both artificially suppress housing delivery and also have an impact on housing affordability. As highlighted in our Regulation 19 representations, we urge the Inspector to review the suitability of this clause as we do not believe it would result in the Plan being found sound in accordance with Paragraph 35 of the NPPF.
- 2.18 In light of the above, it is considered that the Local Plan could go further in striking the right balance between the need for development on brownfield and greenfield sites and the resultant impact on housing affordability. Further, the Council needs to acknowledge that



brownfield sites will take longer to come forward, this coupled with the fact that greenfield sites are being delayed until 2030 will have a severe impact on delivery in the early years of the plan period. It is also emphasised that Paragraph 78 c) of the NPPF sets out that from 1 July 2026 in the case where a Local Plan has been examined against the previous version of the NPPF (2023), Local Planning Authorities will in effect need to demonstrate a 6 year housing land supply by including a 20% buffer.