# Winchester District Local Plan (2020-2040)

Hearing Statement Relating to Matter 2
On Behalf of Bellway Strategic Land

**April 2025** 







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Client Bellway Strategic Land

Date of Issue 4th April 2025

#### 1.0 Introduction

- 1.1 This Hearing Statement has been prepared on behalf of our client Bellway Strategic Land ('Bellway') and the landowners' agent lan Judd and Partners in response to the publication of the Winchester District Local Plan 2020-2040 (the 'Plan').
- 1.2 Representations have previously been submitted to the Council's Regulation 18 and Regulation 19 consultation stages of the Winchester District Local Plan on behalf of Bellway and the landowners' agent; this included documentation which set out the significant planning benefits of the site, which adjoins the settlement boundary of Bishop's Waltham.

#### Bellway Homes' Interest

- 1.3 Bellway Homes have a specific interest in land within the Plan area adjacent to Crown Hill House, to the east of Botley Road, Bishop's Waltham, Winchester, S032 1DQ. Botley Road, the B3035, is a main road into Bishop's Waltham from Botley to the south. The site comprises a single field paddock that is framed by a mature hedgerow interspersed with trees on its northern, eastern and southern boundaries and a modest hedgerow on its western boundary.
- 1.4 The site measures approximately 2.62 hectares and is currently an undeveloped parcel of land that adjoins the settlement boundary of Bishop's Waltham to the south-east. The site is situated between existing dwellings and the character of the site is influenced by the presence of these dwellings and the urban edge of the settlement to the north.
- 1.5 The site is sustainably located within walking distance of the town centre and is connected by pavements. The measured walking distance between the centre of the site and the clock tower in the centre of St George's Square is just 395 metres, this being a comfortable, convenient and very sustainable five-minute walk.
- 1.6 There are bus stops located at St George's Square within 400m of the site providing good connections to Winchester, Fareham and Portsmouth and numerous small settlements between, including Wickham and Swanmore. The site is a sustainable location for development in our view and this site represents a valuable opportunity for a development which would relate very well to the existing settlement.
- 1.7 The site is shown outlined in red on the aerial photograph below and full details of our vision for the site are contained within the 'Botley Road, Bishop's Waltham Vision Document' that was submitted alongside Regulation 19 stage representations.

- 1.8 The site has not been allocated for development; it is therefore an 'omission site' and we continue to promote it for development because of our concerns that the Plan will not deliver enough homes that the evidence confirms are required.
- 1.9 The site is shown edged in red below, and this helps to show the site's relationship with the town, the high street, the town square and local schools. The aerial photograph shows the recent developments to the north-west of the site that were considered to be developments in sustainable locations despite their location further away from the town centre.



Aerial Photograph Showing the Site Outlined in Red, by Courtesy of Google Maps © All Rights Reserved

#### This Statement

- 1.10 This brief Hearing Statement has been prepared in accordance with the prevailing planning policy and guidance, in particular the National Planning Policy Framework (NPPF), September 2023 and the Planning Practice Guidance (PPG).
- 1.11 We do not seek to unnecessarily repeat points raised in the representations submitted by Bellway, but we have answered the questions posed by the Planning Inspector in the Matters, Issues and Questions (ED13) where we feel it would be helpful to do so.
- 1.12 Gillings Planning, on behalf of Bellway and the landowners' agent wish to take a full and active part in the relevant Hearing sessions relating to their interests in the site.

## 2.0 Our Responses to the Matters, Issues and Questions

Matter 2 – Spatial Strategy and Distribution of Development Policies SP1, SP2, SP3, H1, H2, H3, and E1 and E2

Issue: 1 – 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?
- 2.1 In our view, the Council's strategy is based on the 'spreading' of development around the Plan area, and this appears to have been a broadly political decision to cause the least amount of objections from the electorate as possible. The strategy has effectively asked each Parish to 'do its bit' and accommodate some housing growth. There is a noticeable disconnect between the spreading of development around the Plan area and the relative sustainability of each of the locations.
- 2.2 Furthermore, this approach fails to recognise that the most sustainable locations, such as Bishop's Waltham can accommodate more housing and employment growth and higher rates of growth may also help bolster the overall sustainability of the place even further. For example, major housing growth in Bishop's Waltham might result in the town being large enough to have its own secondary school; which would massively improve the sustainability of the town.
  - **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?
- 2.3 As set out in our Regulation 19 representations, and not repeated here, we have expressed concerns that there were many reasonable alternatives available to the Council to consider, including strategic scale development and many omission sites such as Bellway's site in Bishop's Waltham.
- 2.4 We note that paragraph 4.20 of the Council's Housing Topic Paper Update (ED02) dated January 2025 implies that when referring to the failure to bring forward strategic scale development it advises that it "would be impossible to work these up into the Local Plan". This is an excuse. It must be noted that the Council did not contact us relating to our

omission site, and when we sought meetings to discuss how we could bring the site forward, and shared our masterplan for the site, we were flatly refused the opportunity to meet. The Council did not act in a positive or proactive manner.

- **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?
- 2.5 Notwithstanding our concerns about the settlement hierarchy being based solely on facilities within the Plan area as expressed in our Regulation 19 Representations, the 'spreading' of small amounts of growth around the Plan area does not take the opportunities to increase the sustainability of the higher order settlements.
- 2.6 As stated in our Regulation 19 representations we are concerned that the Council's assessment of the services and facilities of a place are not as robust as they could be. For example, Bishop's Waltham does not have a secondary school or college of its own, and children make the short journey (often by bus) to the secondary school in Swanmore and to Winchester, Eastleigh or Havant (for examples) for their college education. The Settlement Hierarchy scores do not truly reflect the provision of services that serve each place.
  - **Q4.** Have settlement boundaries been defined in accordance with a clear and easily understood methodology that is consistently applied?
- 2.7 In our view, and as fully expressed in our Regulation 19 representations, so not repeated here; the Council's strategy for Bishop's Waltham does not allocate housing growth in the most sustainable locations. We can only conclude that the rationale behind this decision is not based on a clear methodology. We particularly note and support the Plan's notion of a 20-minute neighbourhood. We would have expected this criteria to have been used to greater effect when drawing up settlement boundaries. The proposed allocation at Rareridge Lane (for example) is out on a limb and is not a sequentially preferable site when considering other credible alternatives.
  - **Q5.** Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?
- 2.8 Paragraph 2.4 of the Council's Housing Topic Paper Update (ED02) dated January 2025 acknowledges that many respondents have criticised the Council for rushing its local plan through, it states "this was a decision for the Council, not a matter for the Local Plan examination". In our view, and clearly in the view of the 'many respondents' referred to;

there were and are other realistic options for the distribution of development that would see areas such as Bishop's Waltham take more housing and economic growth, and so we remain of the view that all realistic options have not been fully explored.

- 2.9 Whilst the Council consider that the decision to proceed to submit the Plan was a matter for the Council it is for the Inspector to determine if the Plan has been prepared in a positive manner; and in our opinion, it was not.
  - **Q6.** 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?
- 2.10 As set out in our Regulation 19 representations, and not repeated here, we have expressed concerns that the Council has set unrealistic expectations for brownfield development. In our opinion, and based on experience of submitting planning applications in Winchester; brownfield sites are complicated and heavily constrained. These constraints, when compounded by housing values, construction costs and nutrient mitigation lead to a lack of viability and as a result so many brownfield proposals have stalled.
- 2.11 We remain concerned that the Council's brownfield aspirations will not all be delivered within the plan period and there is no fall-back or buffer position.
- 2.12 Furthermore we remain very concerned that the phasing of greenfield developments to the back end of the Plan period would result in supressed housing delivery on all land.
- 2.13 Accordingly, we remain of the view that the Plan's strategy is flawed and will not lead to an increase in supply and improvements to housing affordability.