

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

**Matter 8 Development Allocations the Market Towns  
and Rural Areas (MTRAs)**

Word Count - 2999

**KPPC  
Macra Ltd  
April 2025**

**Issue: Whether the proposed housing site allocations in MTRAs would be justified, effective and consistent with national policy?**

**Larger rural settlements**

**Wickham and Knowle**

*Question 1*

- 1.1 References to allocation WK2 should be removed from both the 'Wickham Housing Sources' table at PDF Page 266 of the WDLP, and within the supporting text at Paragraph 14.111. The allocation has been completed and delivered. It is unnecessary to refer to it within the WDLP.

*Question 2*

- 2.1 The change to the settlement boundary proposed seeks to incorporate both of the proposed site allocations, but also to bring the open space previously allocated under site allocation WK2 within the Winchester District Local Plan Part 2 (2017), into the settlement boundary. This land was previously left outside of the boundary to ensure that the land was delivered for open space and not considered as a development opportunity. There is no rationale for including this land within the settlement boundary now, having regard for the proposed approach to the inclusion of proposed site allocation WK5 - Land at Mill Lane in a new revised boundary, why the Wickham Community Centre and associated development is to remain excluded from the settlement boundary and within the countryside.
- 2.2 The manner in which the Council have drawn the proposed settlement boundary for Wickham is inconsistent and unjustified and there is no reason why the development at Wickham Community Centre and Houghton Way should be excluded from the settlement boundary, when that at Gwynn Way is now proposed to be included.

**Policy WK1 Winchester Road housing and open space allocation**

*Question 1*

- 1.1 The inclusion of this site within the WDLP is unreasonable nor justified. We consider that the site is included to enable the housing requirement for Wickham to be artificially reduced and avoid the need to consider additional allocations at the settlement. The development has been completed and there is no reason for it to be included as a strategic site at this stage.
- 1.2 It is accepted that the open space provision which was associated with this development, intended to be located on land east of Mill Lane, has not been brought forwards, however given that the development has been delivered

without this there is no reasonable justification that this will come forwards within the plan period.

- 1.3 The proposed policy text for Policy WK1 is identical to that which was set out under site allocation WK2 within the Winchester District Local Plan Part 2 (2017). There is no justification for carrying over this policy when the housing development itself has been completed.

#### *Question 2*

- 2.1 There is no reasonable justification for the continued inclusion of this policy and, having regard for the fact that the development of 125 dwellings was found to be acceptable and capable of being brought forwards without this facility and has been subsequently completed, there is no reasonable likelihood of this coming forwards.

#### *Question 3*

- 3.1 On the basis of the isolation of this land parcel from the development which it was intended to serve, the relative isolation of the land from the rest of the settlement of Wickham, and bearing in mind the extant sporting facilities provided at Wickham Recreation Ground and otherwise provided within the settlement, there is no appropriate justification for the delivery of this open space. The provision of open space would be better secured as part of other strategic development which is to be delivered at Wickham, and it is the case that, the opportunity to deliver development at *W124 'Land at Mayles Farm, Wickham'*, could enable the provision of a substantial area of public open space and the delivery of additional specific sporting facilities in a viable manner as part of a broader pattern of strategic development.

#### *Policy WK3 Welborne Open Space*

#### *Question 1*

- 1.1 The title of this policy is fundamentally misleading. The Council's inference is that the land is required to be delivered as public open space to serve the Welborne Garden Village allocation. This is fundamentally incorrect and there would be no appetite from the landowners to bring forwards their land for such purposes given the absence of any incentive to do so.
- 1.2 *Land at Mayles Farm (W124)* is the only site that offers this opportunity, it is the missing piece of the puzzle to deliver a cohesive country park style landscape between the settlement areas, which would remain permanently open and preserve the character of the open gap between the settlements.
- 1.3 There is no incentive for landowners to make their land available for open greenspace and indeed there is no realistic prospect that any such proposals would come forwards in isolation from an appropriate quantum of housing

development in order to justify the land being released and made available to the public.

- 1.4 The landowner of *Land at Mayles Farm, Wickham*, comprising a significant area of the proposed 'Welborne Open Space', sees no incentive to bring this forwards on the basis that is set out and the land will remain inaccessible to the public and providing no natural infrastructure benefit.
- 1.5 The Council propose that the site forms part of the 'Welborne Open Space' approximately 201 hectares in area. The Council consider that, despite none of the housing development within the Welborne Garden Village being located within Winchester District, the WDLP should provide a green buffer to ensure that Welborne does not coalesce with Wickham or Knowle. The Council is seeking to define this as an open gap and suggests that some natural green infrastructure could be located on the land falling within Winchester District, however it has no means of seeing that this land is brought forwards for such purposes.
- 1.6 The most appropriate way of securing a significant quantum of this land as open space, is to formally allocate part of the land for development, to round off the southern edge of Wickham settlement, and to allow the remainder of the pastureland to be brought forwards formally as public open greenspace which would form a cohesive network with the Welborne Garden Village and the Ravenswood development at Knowle. This would provide connectivity, which is otherwise incapable of coming forwards, and the formal allocation of part of the land within a 'Welborne Open Space' allocation which is actually deliverable and can be transferred into public ownership would deliver substantial public benefits.
- 1.7 The WDLP strategy has not given appropriate consideration to this opportunity. The Parish Council, through the detailed engagement had with the general public, undertaken alongside the preparation of the WDLP, made clear that they saw the clear potential of the development of *Land at Mayles Farm (WI24)*, and the high quality sense of place this would create, delivering upon the strategic needs for housing growth and at the same time securing in perpetuity the separation between Wickham, Knowle and Welborne Garden Village through a formalised and protected 'green gap' which would be held in public ownership.
- 1.8 The land will otherwise not be brought forwards and the Council will not be able to, as Policy WK3 proposes, secure the land within Winchester District as part of the 'open areas' relating to the Welborne Garden Village development.
- 1.9 The Council's approach appears confused. Paragraph 14.115 states: "*the uses and management of the area of land comprised within WK3 must help to secure an effective viable and long term gap between the settlements of Welborne, Knowle and Wickham*", and moreover that "*it may be possible to accommodate*

*some natural green infrastructure on the land*". There is no such potential to deliver this with sufficient landowner incentive to bring the land forwards.

- 1.10 The Welborne Garden Village has been designed and arranged such that it provides for all of the public open space, SANG and other greenspace provision that was needed to meet the requirements of the Fareham Borough Development Plan, including The Welborne Plan (2015). There was no reliance upon land outside of Fareham Borough to achieve this.
- 1.11 Policy WK3 is misleading, it appears to suggest that the land is integral to the delivery of the Welborne Garden Village and forms part of the strategic development allocation (SDA), which it does not.
- 1.12 The Council are duplicating the role and function of Policy NE7 – Settlement Gaps, through Policy WK3. The policy does not functionally appear to designate the land for any purpose other than to indicate that the land should be retained as open and undeveloped but rather makes vague assertions that the land should 'form part of open areas'.
- 1.13 The policy as drafted is both unreasonable and irrational and should be removed in its entirety. It serves absolutely no purpose other than to duplicate Policy NE7 and is entirely incomprehensible on what it anticipates will occur.

#### *Question 2*

- 2.1 Having regard for the approach to the Welborne Garden Settlement, we do not consider that there is any justification for the extent of the settlement gap that the policy seeks to achieve.

#### *Question 3*

- 3.1 We will be making detailed comments in respect of Policy NE7, as we did at the Regulation 19 Consultation Stage. Policy WK3 serves precisely the same function as Policy NE7 in delivering a settlement gap and is not reasonably required.
- 3.2 The Council have undertaken a fundamental review of the proposed settlement gaps within the evidence base document titled 'Settlement Gap Review – Winchester City Council' dated July 2024 ('the SGR'), which is intended to have informed its decision making in relation to the proposed settlement gaps within the WDLP.
- 3.3 There is a notable policy rub between the statements made within the SGR when read alongside the PfSH Policy Framework for Gaps, whereby the SGR discusses the settlement gaps as a means of identifying and protecting local landscapes including where these are sensitive, however the Policy Framework for Gaps confirms, settlement gaps *'are spatial planning tools designed to*

*shape the pattern of settlements - **they are not countryside protection or landscape designations**'.*

- 3.4 The purpose of the settlement gap should be solely to prevent coalescence and it should not be used as a tool to protect what are considered to be sensitive landscapes or particular landscape character areas. There are other policy mechanisms set out within the NPPF that enable such protections.

- 3.5 The SGR confirms that the 'Welborne Gap' between the settlements of Wickham and Knowle and the Welborne Garden Village was first introduced within the Winchester Local Plan Part 1: Core Strategy (2013), under Policy CP18. The purpose of the designation of the settlement gap was noted to be:

*To protect the individual character and identity of those settlements adjoining the proposed strategic development area at North Fareham, an area of open land is identified as a Gap to be maintained between the strategic development area and Knowle and Wickham (see Policy SH4).*

- 3.6 The SGR falsely states that it is intended that the settlement gap will be used as open green space and infrastructure.

- 3.7 The Welborne Plan (2015) specifically designates buffer zones at the northern and western edges of the strategic allocation that are to comprise greenspace buffers to the Winchester Plan Area boundary and the settlements of Wickham and Knowle. The policy that governs these gaps is Policy WEL5 of The Welborne Plan (2015) and indeed this does not relate at all to the land outside of Fareham Borough Council's plan area. Policy WEL29 of The Welborne Plan governs the provision of open space and green infrastructure as part of the allocation and likewise does not apply to land outside of the Fareham Borough Council plan area.

- 3.8 It is incorrect to state that the settlement gap at Wickham and Knowle is designated to service the Welborne Garden Village. This is simply not the case.

- 3.9 There is little rationale for not reviewing the settlement gap and Wickham, Knowle. Consideration should have been given to opportunities which will enable the land to actually be brought forwards for open greenspace, alongside an appropriate pattern of housing development, in a manner which will not prejudice the function and role of the gap.

- 3.10 We do not consider that the WDLP is sound in this regard. The Council have not properly considered this important opportunity in a complex part of the Plan Area where there is significant opportunity to deliver a clear and sustainable vision for the communities of Wickham and Knowle, and a joined up approach with the Welborne Garden Village.

Policy WK5 Mill Lane

*Question 1*

- 1.1 Land at Mill Lane, Wickham (WK5) would see Wickham settlement sprawl northwards outside of and beyond the current firm development boundary that is formed by the transition from the existing pattern of development at Houghton Way and the pastoral pattern of fields beyond. The site would be accessed from Mill Lane, which itself transitions in terms of its character and there is a very clear shift from what reasonably forms part of Wickham settlement to land which very much forms part of its rural agricultural context with little urbanising influence.
- 1.2 The character of Mill Lane leaving the settlement changes. There are urbanising influences to the south comprised within the existing settlement boundary, but on approach to Site WK5, approximately 100m to the south, the character of the lane changes to a rural country lane with a strong degree of enclosure and absence of urbanising features. The enclosure provided by the tree line on both sides of the lane and native hedgerows provide a wholly rural character. On reaching the edge of site WK5, the character is firmly one of the countryside. There are no urban influences looking northwards and the context is solely of pastoral agricultural fields and mature trees and hedgerows as strong landscape features.
- 1.3 The existing settlement edge is comprised of an existing mature hedgerow screen with juvenile hedgerow trees. This will become more robust over time, but it is evident that, when looking north, the land is intrinsically rural, and that new development would significantly and materially change its character.
- 1.4 In landscape terms, the land rises northward, with the landscape to the north of the village making a significant contribution to the distinctive character and rural setting of the village. It is considered likely to be valued for its intrinsic countryside character, beauty and tranquillity.
- 1.5 The boundary of the South Downs National Park lies approximately 100m to the north. The Council consider there is scope to mitigate the impact through careful siting and design, where development could be accommodated without changing landscape character through concentrating development to the south and SW corner of the site. However this will diminish the gap to the SDNP and we do not consider that the pressure upon the designation is justified when other opportunities exist.
- 1.6 The character of the landscape is entirely consistent with that entering the South Downs National Park Designation and thus this land forms intrinsically part of its setting. There is no fundamental change in the landscape which indicates that the site should be released. The pastoral pattern of fields, with ribbons of hedgerows and hedgerow trees and clusters of woodland is entirely consistent with this character.

- 1.7 It is clear that the designation of this site for development will clearly extend Wickham far beyond any of the previous patterns of development at the northern edge of the settlement, and will appear as a finger of growth pushing out into the landscape.

*Question 2*

- 2.1 There is no certainty that an appropriate means of access can be delivered in this respect that would not materially change the character of Mill Lane.

*Question 3*

- 3.1 No comment.

*Question 4*

- 4.1 No comment.

*Question 5*

- 5.1 No comment.

*Question 6*

- 6.1 We do not consider that the site is deliverable due to the constraints discussed.

*Policy WK6 Land at Southwick Road/School Road*

*Question 1*

- 1.1 No comment.

*Question 2*

- 2.1 The designation of at Southwick Road/School Road (WI03) for housing development would see Wickham settlement sprawl eastwards; substantially beyond the existing extent of the settlement.
- 2.2 The Council describe this site as surrounded by residential land uses to the south, and agriculture to the north, east and west; however this is factually incorrect. There is residential development to the east and west however there are agricultural uses to the north and south. The site is positioned alongside the recent strategic housing allocation WK3 – Glebe Housing Allocation and open space, which was designated within the Winchester Local Plan Part 2 (2017).



- 2.3 The Council consider the site to not be prominent from public viewpoints and well concealed within the wider landscape due to topography and trees, however, fundamentally, the designation of the site will extent the sprawl of the settlement eastwards out into an unrestricted open pastoral landscape with no nearby built context to relate to. The designation of this site could lead to further unrestricted sprawl and is contrary to the nucleated settlement pattern of Wickham, pushing development further away from services and facilities in the core of the settlement.
- 2.4 There is little rationale again to push development out into the pastoral landscape where there are no advantages for local connectivity or the delivery of significant public infrastructure to mitigate for the sprawl of the urban area.

*Question 3*

- 3.1 No comment.

*Question 4*

- 4.1 We do not consider that the site is deliverable due to the constraints discussed.

*Question 5*

- 5.1 No comment.

*Question 6*

- 6.1 No comment.

*Policy KN1 Ravenswood/Knowle*

*Question 1*

- 1.1 There has clearly been some thought given to this approach for Knowle, whereby the designation of the *Ravenswood, Knowle* allocation will enable an area of open greenspace to be permanently secured which forms part of the settlement gap, but this logical approach has not been extended to Wickham, indeed it appears to have expressly been dismissed without consideration.

*Question 2*

- 2.1 No comment.

*Question 3*

- 3.1 No comment.