

LITTLETON AND HARESTOCK PARISH COUNCIL (LHPC)

Examination of the Winchester District Local Plan 2020-2040

Matter 14 Policy NE7 Settlement Gaps

**Submission by Littleton & Harestock Parish Council
Representation Ref No ANON-AQTS-3BEW-A**

Matter 14: Biodiversity and the natural environment

Issue: Would the Plan's policy framework in relation to the protection and enhancement of biodiversity and the natural environment be effective and justified and would the individual policies be clear, justified and consistent with national policy, and would they be effective?

Introduction

1. This submission sets out the response of Littleton & Harestock Parish Council in respect of Matter 14 Policy NE7. It should be read alongside its submissions on Matter 6 Policy W2 and Matter 12 Policy D5.
2. The Parish Council does not oppose the redevelopment of the Sir John Moore Barracks (SJMB) site for 750 dwellings. However, it does have serious concerns regarding the impact of the scale of development proposed by Winchester City Council (WCC) on the character and natural environment of the area i.e. 900 dwellings Policy W2. In particular, it is concerned about the impact on the Winchester–Littleton settlement gap, Policy NE7 and the Northern Fields candidate SINC.
3. The Parish Council has been consistent in its objections to the scale of development proposed throughout the preparation of the plan based on its impact on the gap and ecology at both the Regulation 18 (November 2022) and Regulation 19 (August 2024) stages of the plan's preparation.
4. It has participated in the engagement process undertaken by the DIO in the preparation of the concept masterplan consistent with its responses on the emerging local plan. This submission regarding Policy NE7 has been informed through that involvement.
5. The Parish Council prepared a planning brief for the site in support of its representations on the Local Plan, available at <https://lhpc.org.uk/wp-content/uploads/2024/08/LHPC-Planning-Brief-SJMB-v5-10Jul24.pdf>.¹ This was circulated to Winchester City Councillors and its Planning Department, with a courtesy copy also sent to the DIO. The planning brief includes a map showing the council's proposed definition of the settlement gap, reproduced in Appendix B. The existing settlement gap, as shown in the Littleton Village Design Statement, is available at Appendix A.

¹ LHPC prepared a planning brief in 2023 to outline its preferences and recommendations in relation to the development of the SJMB site. It took account of the Village Design Statement in setting out principles for the scale and location of the development, the existence of the settlement gap, integration within the existing community, management of the effect on the transport network and the impact on ecology. The planning brief was updated in 2024 to take account of the candidate SINC in the Northern Fields and was circulated to all Winchester City Councillors, the Planning Department and DIO.

Policy NE7 Settlement gaps

Q1 What is the robust evidence to justify an approach to define settlement gaps, given the absence of national policy or guidance in this regard?

6. Retaining the separate identities of settlements and their character is a well-established approach and has been a feature of the planning system in Hampshire since the late 1970s. The absence of any national policy or guidance in respect of settlement gaps is not considered to be a reason to exclude their designation in local plans where they are justified to retain the character and identity of settlements.
7. The NPPF, ref RP07, paragraph 135 c) and d) encourages policies which are sympathetic to local character and maintain a strong sense of place. Residents of Littleton value the designation of a settlement gap a to maintain a sense of identity and separation from the City.

Q2 The Settlement Gap Review Study [BNE29] assesses 7 of the 9 existing settlement gaps and recommends alterations to them. Is the methodology used proportionate and robust? Are the outcomes logical and evidence based?

8. The Parish Council's issue with the Study is that it excluded a review of the Winchester-Littleton Gap.
9. WCC had an opportunity to review the boundary when it commissioned consultants LUC to review the boundaries of the existing settlement gaps. The Settlement Gap Review July 2024 (ref BNE29) did not include the Winchester-Littleton gap. The reason given was that the master planning process would determine the extent of development and in turn inform any future review of the settlement gap (see page 3 paragraph 1.8 of BNE29).
10. WCC's response to the Regulation 18 representations by the Parish Council confirmed that it is the masterplan and the planning application process which will determine the boundary of the settlement gap in respect of the SJMB site, not this local plan.
11. WCC have been aware for a number of years of the potential for the redevelopment of the SJMB site following announcements that it would close and that the review of the adopted local plan provided an opportunity to plan its future.
12. The existing settlement gap boundary includes a substantial area of the site, some of which already has built development; clearly a review of that boundary was necessary. In that context, it is difficult to understand why WCC did not take a proactive approach and review the existing boundary to inform the assessment of the site's capacity for housing.

Q3 What is the robust evidence to assess 7 of the 9 existing settlement gaps in the Settlement Gap Review Study 2024?

13. The Parish Council does not have a view in respect of the seven gaps reviewed, apart from the fact that the Winchester-Littleton gap was not included.

Q4 Would the Plan represent the consistent application of that methodology, particularly in the approach to defining settlement gap boundaries some of which would be defined through site allocation requirements e.g. policy W2?

14. There is an issue of consistency of approach in respect of Policy W2. The Winchester–Littleton gap is the only one in Policy NE7 where the proposed boundary is highlighted to be the subject of change via Policy D5, the preparation of a masterplan, and a future review of this local plan.
15. With regard to the Winchester-Littleton gap the methodology set out in the policy and the supporting text has not been followed. The defining of the boundary has been delegated to the masterplan process and a future review of this local plan.
16. Paragraph 12.26 of SD01 advises that the masterplan will help deliver development which responds positively to the settlement gap. However, the masterplan does not appear to have been informed by an assessment based on the approach set out in paragraph 3.7 page 16 of BNE29. In the SJMB Masterplan’s analysis of the site constraints (pp 22-23), references to the existing settlement gap are conspicuous by their absence, which calls in to doubt the effectiveness of applying this policy.
17. It proposes an 80-90m settlement buffer between the development and Littleton and Harestock, as shown on a diagram on page 38 of ED12. However, an 80-90m buffer does not appear to be proposed along the narrowest boundary as far as the gap is concerned, i.e. along Kennel Lane (see the diagram on page 39 of SD12).
18. It is not at all clear how that buffer has met the criteria of Policy. The suggested gap, which includes land on the western, southern and eastern boundaries of the site, bears no relationship with the remainder of the settlement gap identified in Policy NE7. The notation is not repeated on the diagram under the heading of concept masterplan on page 45 of ED12, which raises the question of what plan has been endorsed by WCC.

Q5 Would policy NE7 strike the right balance between ensuring planned growth is delivered and protecting the District’s character and appearance, in particular the open nature and sense of separation between settlements?

19. In respect of the Winchester–Littleton settlement gap the Parish Council considers that the right balance between planned growth and protecting the character of the area has not been achieved.
20. The allocation of 750-1000 dwellings has not been informed by a robust assessment of the implications for the settlement gap proposed in Policy NE7. The impact to achieve the ‘working assumption’ of 900 dwellings has not been demonstrated. With reference to the masterplan ED12, it would appear that to achieve 900 dwellings, there is no scope for a meaningful gap along the Kennel Lane boundary.

Q6 Given that settlement gaps are a spatial planning tool designed to shape the pattern of settlements, for the purposes of soundness, would the policy be a good fit in the biodiversity and natural environment chapter of the Plan?

21. The Parish Council does not have a view on this question

Q7 Would paragraph 7.64 be accurate in relation to definition of the gap between Wickham, Knowle and the proposed Welborn development in Fareham being defined by the Welborne Plan?

22. The Parish Council does not have a view in respect of this gap.

Q8 Should policy NE7 provide a clear link to the policies map for the purpose of effectiveness?

23. The understanding of the local plan would be improved if there was a clear link between Policy NE7 and the policies map.

This concludes our submission.

Appendix A: Existing Littleton Gap

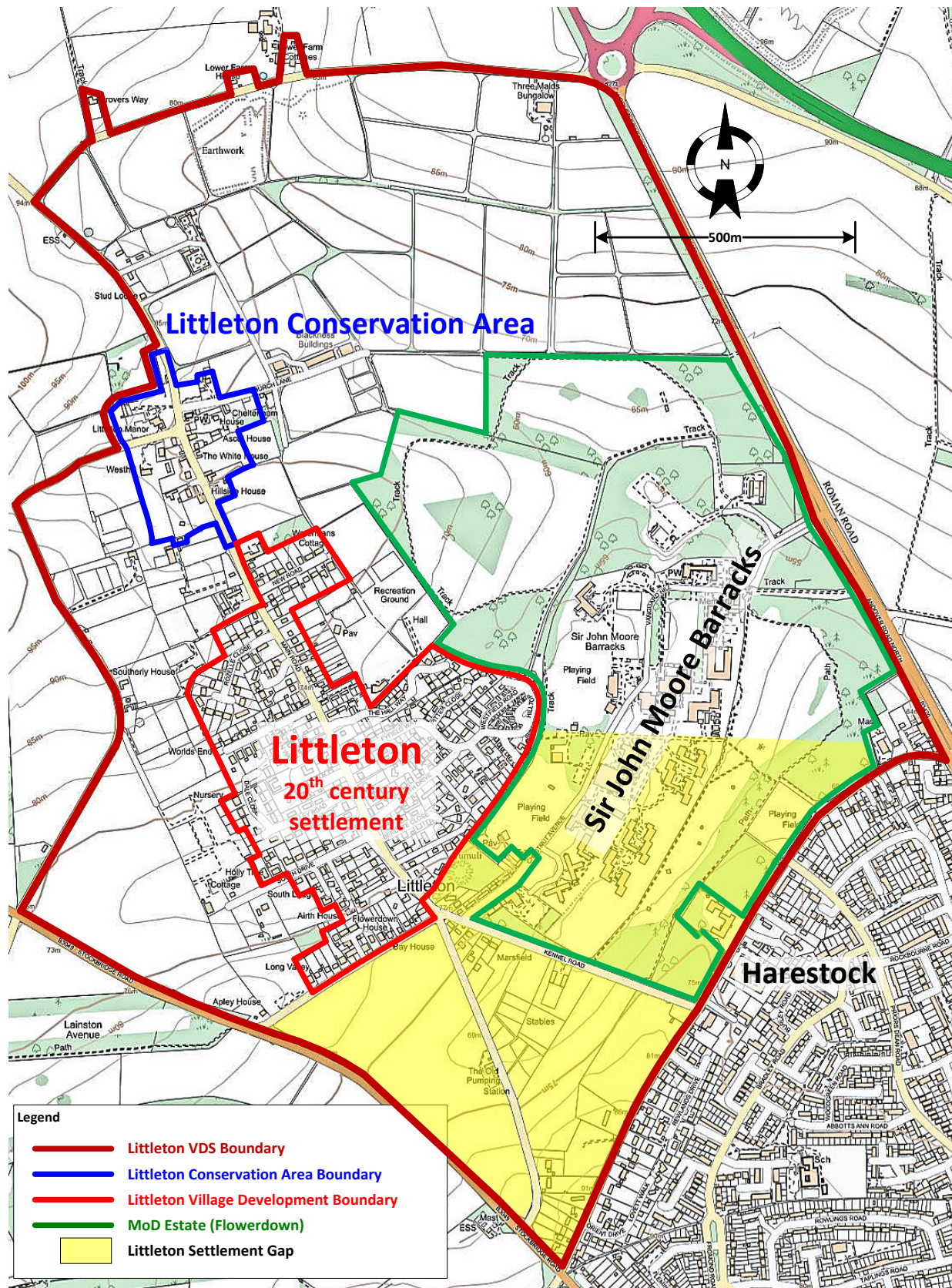
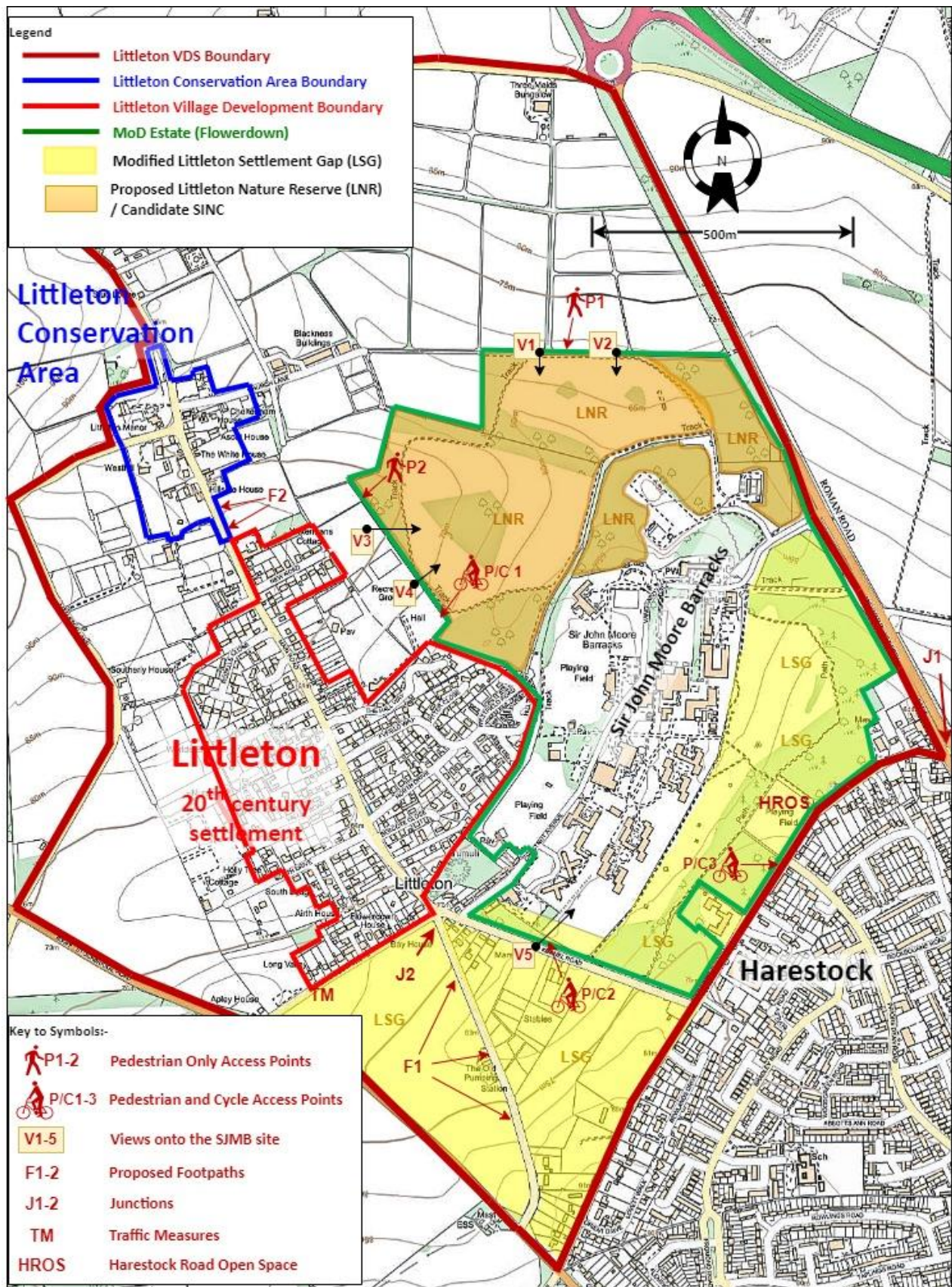


Figure 1: Existing Littleton Settlement Gap, as shown on page 5 of the Littleton Village Design Statement (Supplementary Planning Document for the current adopted local plan see <https://www.winchester.gov.uk/planning-policy/winchester-district-local-plan-2011-2036-adopted/supplementary-planning-documents-spds/village-and-neighbourhood-design-statements>)

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Appendix B: Proposed Littleton Settlement Gap



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Figure 2: Proposed Littleton Settlement Gap, as shown in the Parish Council's planning brief for the Sir John Moore Barracks. See <https://lhpc.org.uk/wp-content/uploads/2024/08/LHPC-Planning-Brief-SJMB-v5-10Jul24.pdf>

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