

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

Matter 14: Biodiversity and the natural environment

Word Count - 1980

**Ken Parke Planning Consultants Ltd
On Behalf of Macra Ltd
April 2025**

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?

Policy NE7 Settlement gaps

1. *What is the robust evidence to justify an approach to define settlement gaps, given the absence of national policy or guidance in this regard?*
 - 1.1 The designation of settlement gaps is an accepted spatial planning tool to prevent settlements from merging with each other. With respect to those designated in Winchester City Council's plan area, the origins of these date back to the South and Mid Hampshire Structure Plans (1988 and 1989). There were subsequently carried forward into the Hampshire County Structure Plan 1994 and the Hampshire County Structure Plan 1996-2011 and more recently have been a feature of the Local Development Plan.
 - 1.2 Winchester Council have identified a total of nine areas within the district where it is considered that the physical separation of distinct settlements within with district require specific protection to ensure that there is no risk of coalescence of those settlements which would diminish their separate identities.
 - 1.3 These areas of land are proposed to be formally designated as 'settlement gaps' on the basis that the Council consider these to be generally undeveloped and comprising open land. The majority of these allocations represent a continuation from the previous adopted Winchester Local Plan Part 1: Core Strategy (2013).
 - 1.4 Specific guidance on the criteria for designation of an open gap set out within the Partnership for Southern Hampshire (PfSH) document titled 'Policy Framework for Gaps' (December 2008).
 - 1.5 As the PfSH 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*'.
 - 1.6 In this respect, they have little functionality in terms of providing green infrastructure or in increasing access for the public to greenspace on the periphery of their settlement. However, that is not to say that this cannot be a mutually performed role of such land and indeed at Paragraph 7.65 of the WDLP, the Council indicate that '*strategic gaps provide a key opportunity to provide green infrastructure around the district*'. In order for this opportunity to be realised however, it is necessary to make it attractive and viable for landowners to make their land available for such purposes. There is no realistic

likelihood of landowners giving up their land within settlement gaps for green infrastructure and open space without reasonable incentive.

2. *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?*
 - 2.1 We do not consider that the Council's approach to the review of settlement gaps is either reasonable or appropriate. The Council have taken an inconsistent approach to review of these designations through not seeking to review two of the settlement gaps, including that between Wickham, Knowle and Welborne.
 - 2.2 The Council's rationale is on the basis that they consider that the settlement gaps are established by way of Policies WEL5 and WEL29 of the Welborne Plan (2015). Notwithstanding this however, it is clear from the Welborne Plan that the extent of the buffers only relates to small strips of land included within the Fareham Plan Area which are shown on Appendix B.3 to the Fareham Plan, enclosed at appendix **ABh1** to this hearing statement. Policy WEL29 of the Welborne Plan governs on-site open space and again does not speak at all to settlement buffers. The Council's understanding of the policy context in this respect is incorrect and irrational.
 - 2.3 The PfSH Policy Framework for Gaps confirms that, in defining the extent of a gap '*no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation*'. In this respect the gaps set out within the Welborne Plan are considered to perform this function. A more meaningful gap can be delivered by way of the WDLP of this is justified, however the extent proposed by the Council at this time is both excessive and irrational.
3. *What is the robust evidence to assess 7 of the 9 existing settlement gaps in the Settlement Gap Review Study 2024?*
 - 3.1 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.
 - 3.2 There appears to be at the least 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***'.

3.3 Indeed, 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.

3.4 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). Development which would threaten the open and undeveloped character of this area will be resisted and the land should be managed to secure the long-term retention of its rural character

3.5 It is clear from the SGR that whilst seven of the nine settlement gaps across with Winchester Plan Area have been reviewed, that no review has been undertaken of the settlement gap between Wickham, Knowle and Welborne. Indeed, beyond confirming that this settlement gap remains in place, there is no meaningful discussion of these at all.

3.6 The SGR states that this has not been reviewed as permission has been granted for Welborne Garden Village and moreover that it is intended that the settlement gap will be used as open green space and infrastructure. This however is not quite correct. 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.

3.7 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.

3.8 There is little rationale for not reviewing the settlement gap at Wickham, Knowle, and indeed considering whether there are 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, should have been fundamental to Winchester Council's consideration of the approach to development at Wickham and Knowle.

- 3.9 There is clear and demonstrable public benefit which would be gleaned from the allocation of *Land at Mayles Farm, Wickham*, and the securing of significant areas of open greenspace which would provide a connected pattern of green infrastructure between Wickham, Knowle and Welborne Garden Village, alongside the meeting of the housing needs of Wickham in a sustainable way.
- 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.
4. *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?*
- 4.1 We do not consider that the methodology has been applied consistently, particularly having regard that no such review has been undertaken in respect of the settlement gap at Wickham and Knowle, and indeed it is wholly inconsistent that a specific policy is seeking to be introduced in this respect within the plan, which appears to have the ulterior motive of seeking to allocate the land as functional open space, when there is no justification for this approach, nor will the land be brought forwards for such purposes without landowner incentive by way of facilitating residential development.
5. *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?*
- 5.1 As noted above, we do not consider that settlement gaps are designed to offer countryside protection or to comprise landscape designations. Their role is to shape the pattern of settlements and to maintain a separation between them for the purpose of preserving their distinctiveness.
- 5.2 Having regard for the size of the settlement gaps that the Council is seeking to designate, we consider that these are often excessive for purpose, and indeed, this is abundantly clear with respect to the Wickham and Knowle settlement gap with respect to its function in maintaining the separation from Welborne Garden Village.
- 5.3 The PfSH Framework confirm that, *"in defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard for maintaining their physical and visual separation"*. It is fundamentally clear that a 201ha area is not required at all for this purpose and indeed the extent which the Council seeks to designate is excessive. As we show on the plan appended at **ABh3**, a much lesser area would perform the same function in maintaining a gap between the settlements, and in any even, having regard for the existing pattern of development along Hoads Hill,

there is already built development within the settlement gap that the Council are seeking to designate which forms an established part of its character. Indeed the Council have taken a fundamentally different approach to the proposed settlement gap at Knowle, which excludes existing development and indeed is a much reduced area that will still perform the function of maintaining the clear separation of Welborne and Knowle settlements.

- 5.4 The separation of Wickham, Knowle and Welborne is already strongly reinforced through the substantial area of woodland comprising:

- Fiddlers Green;
- Dandy Copse;
- Dash Wood;
- Ravens Wood;
- Shaftesbury Copse;
- Aytesbury Copse; and,
- Birchfrith Copse.

- 5.5 The preservation of this substantial woodland feature and designation of parcels of complementary land around this element would perform strongly the function of maintaining a settlement gap between the settlements. This would also retain a suitable area of land to enable future expansion of Wickham settlement, which could enable additional land, which would contribute to maintaining a permanently open gap between the settlements, to be brought forwards and made publicly accessible and available. We have indicated a clear opportunity for the Wickham settlement edge at appendix **ABh2**.

- 5.6 The Council's use of settlement gaps strays beyond their baseline purpose as a spatial planning tool in this regard and is excessive, designed to limit the sustainable expansion of Wickham settlement rather than to ensure that a settlement gap is functional and preserves the distinct separation of the settlements which it is positioned between.

6. *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?*

- 6.1 No comment.

7. *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?*

- 7.1 The Council state that their intention is to preserve the gap between Wickham Knowle and Welborne, however the Council have sought, under Policy WK3 to seek to designate a larger area to define the gap for the purposes of delivering the 'Welborne Open Space'. This is inaccurate and inconsistent.

7.2 For the reasons we have set out above, a much reduced area of land would still perform the same function of preventing the coalescence of the settlements and could offer an appropriate degree of permanence without including existing built development and moreover without sterilising development opportunities for the expansion of Wickham settlements which are supported by the Wickham and Knowle Parish Council.

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

8.1 No comment.

**ABh1 –
Welborne Plan Excerpt - Settlement Buffers WEL5**

Fareham Local Plan

Shaping Fareham's Future

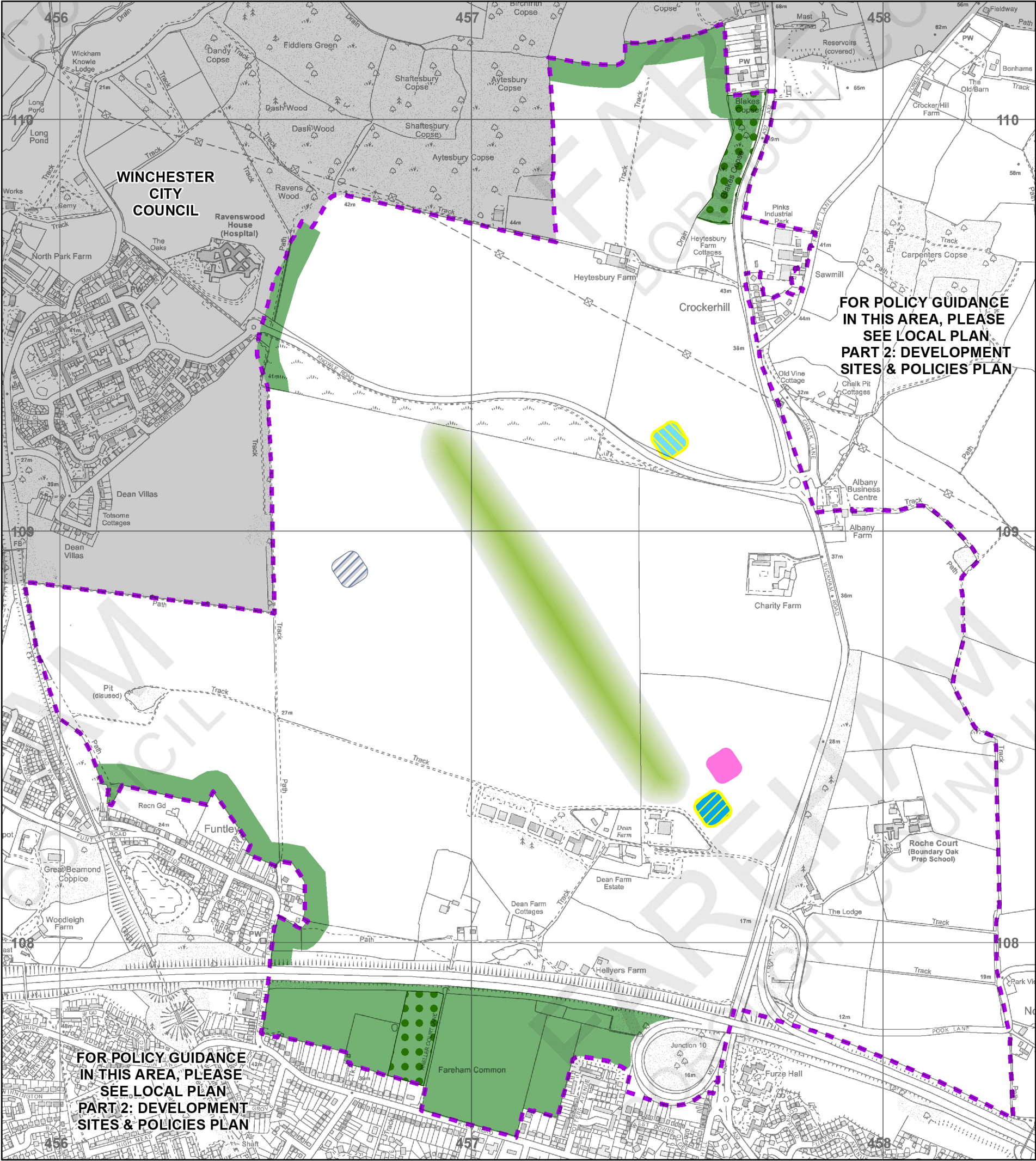
Local Plan Part 3: The Welborne Plan

**June 2015
Adopted Version**

Contents

	Page
Chapter 10: Delivering the New Community	120
Phasing of Development	120
Phasing Plan	120
Housing and Employment Trajectories	125
Flexible Approach to Phasing	126
Phasing of Infrastructure	127
Safeguarding Land for Specific Development	128
Developer Contributions	129
Development Construction Strategy	130
Local Skills	131
Quality Control	131
Chapter 11: Monitoring and Review	133
The Monitoring Framework	133
Glossary	138
Appendices	151
A Schedule of Evidence and Background Documents	152
B Maps and Diagrams:	159
B.1 Constraints Map	160
B.2 Strategic Framework Diagram	161
B.3 Extract of the Fareham Policies Map Covering Welborne	162

WELBORNE POLICIES MAP











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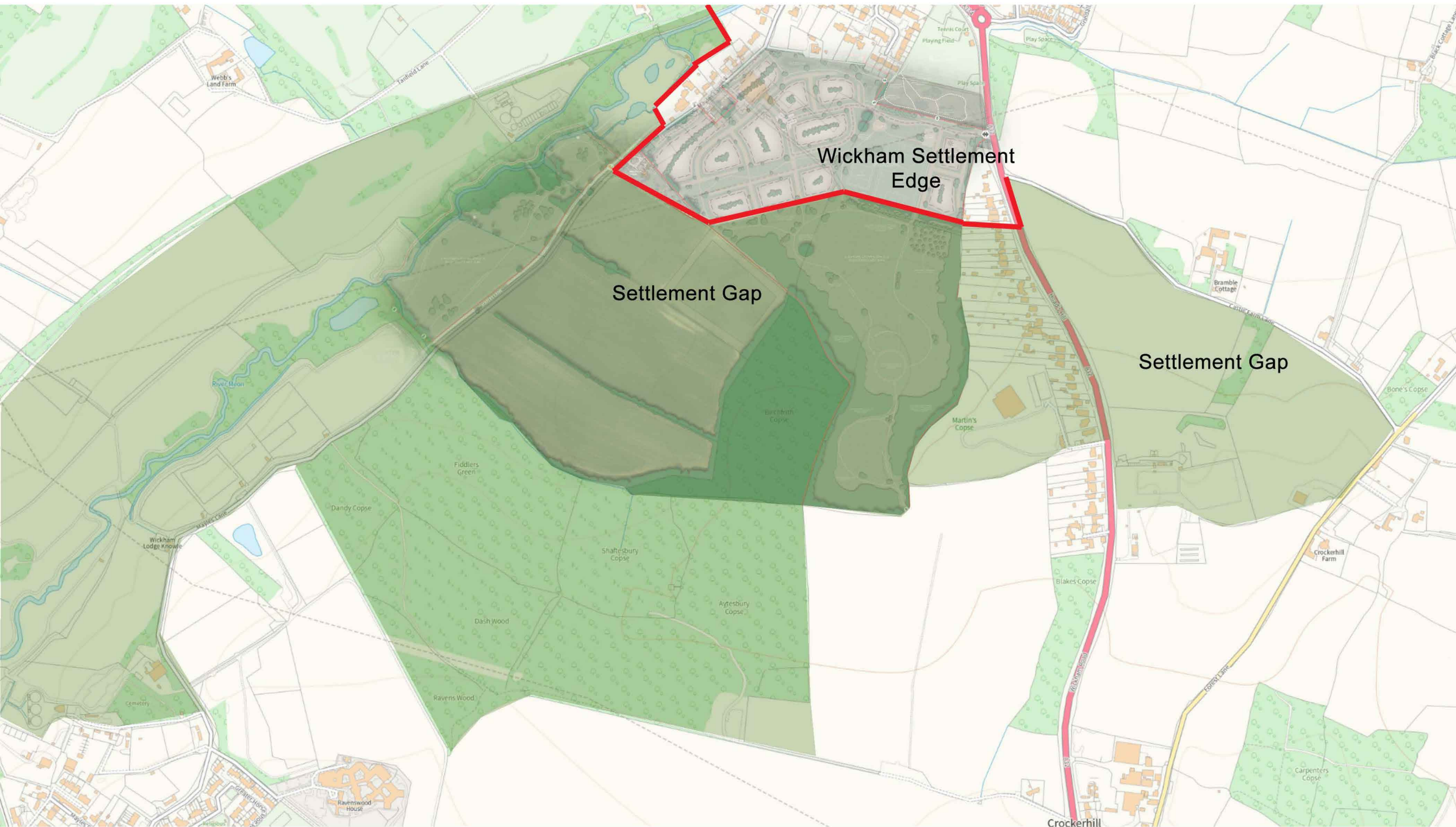


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LEGEND

-  WELBORNE POLICY BOUNDARY (CS13, WEL1-4, WEL6-43)
-  SITES OF IMPORTANCE FOR NATURE CONSERVATION (CS4)
-  WELBORNE SECONDARY SCHOOL APPROXIMATE LOCATION (WEL16)
-  WELBORNE SETTLEMENT BUFFERS (WEL5)
-  WELBORNE CENTRAL PARK APPROXIMATE LOCATION (WEL29)
-  WELBORNE LOCAL CENTRE APPROXIMATE LOCATION (WEL11)
-  WELBORNE DISTRICT CENTRE APPROXIMATE LOCATION (WEL10)
-  WELBORNE COMMUNITY HUB APPROXIMATE LOCATION (WEL12)

**ABh2 –
Wickham Built Edge and Settlement Gap Plan**

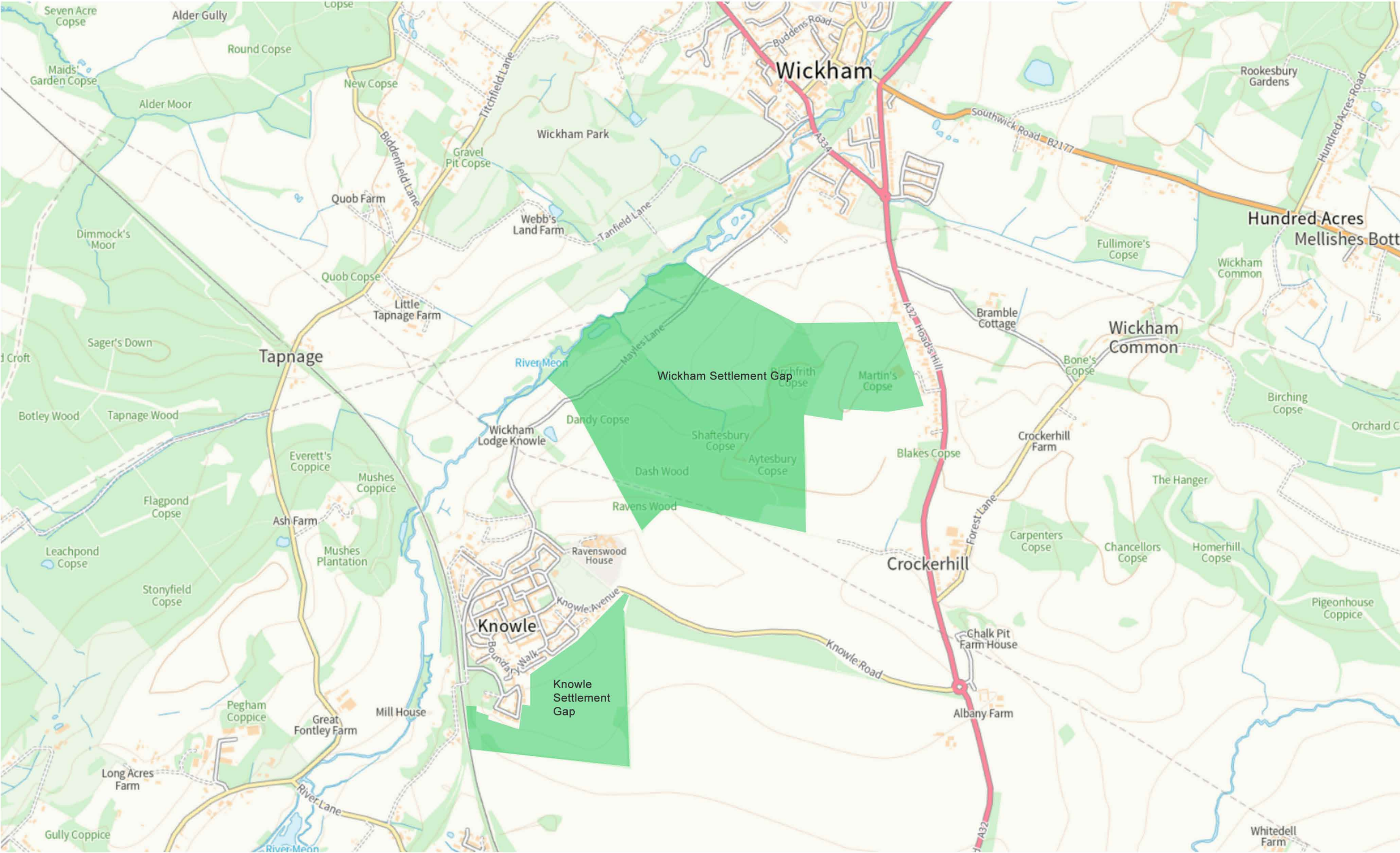


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**ABh3 –
Wickham Knowle and Welborne Settlement Gap Plan**



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