

Winchester Local Plan 2020-2040

Hearing Statement on behalf of:

Peter Nicholas Homes
(Representor No. ANON-AQTS-3296-D)

Relating to 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

Q 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?

Response

- 1.1 Peter Nicholas Homes (PNH) consider the Inspector's question to be very relevant given that there is no national policy or guidance relating to settlement gaps. Furthermore, national policy relating to Green Belts has also changed since the Winchester Local Plan was submitted. Although this is not a green belt situation,

the principles and 5 purposes of green belt can be seen as relevant to the non statutory gap policies which seek to avoid coalescence and maintain openness.

- 1.2 The lack of national policy and guidance relating to settlement gaps is acknowledged by the Council in their 2024 Settlement Gap Review (BNE29) at paragraph 2.2.¹ In this absence, the document instead focusses on national policies relating to the conservation and enhancement of the natural, built and historic environment with a particular emphasis on policies relating to landscape preservation. The document goes on to draw attention to local landscape designations that have been considered by the Planning Inspectorate and the findings that have emerged from the during local plan examinations (Para 2.6). One of the findings was that these are *“Designations to prevent settlement separation rather than other purposes such as protecting the setting of historic environmental assets”*.
- 1.3 The 2024 Gap review (BNE29) goes on to draw attention to the Hampshire Structure Plan 1996-2011 (adopted 2000) which provided for strategic gaps and added a category of local gaps. Such gaps were designed to preserve the separate identities of smaller settlements at risk of coalescence.
- 1.4 Reference is also made to the Partnership for Urban South Hampshire (PUSH) guidance on settlement gaps. The Policy Framework for Gaps – December 2008 (RP09) is referenced. This document sets out criteria for authorities to use to help define and designate settlements and makes clear that gaps should not be entirely prohibitive of development. Key aspects to decide if development should be permitted related to diminishing physical and/or visual separation of settlements and compromising the integrity of the gap. Despite its age, this document is still accessible on the PUSH website and is part of the Local Plan 2040 Evidence base. It is also directly referenced in the Submission Local Plan (SD01) . at Paragraph 7.60. Reference is also made to the 2023 PUSH Spatial Position Statement (PSH01) which suggests that Local Plans should consider settlement gaps where they would be important to maintain character and visual gaps between settlements. (

¹ This document pre-dates the publication of the December 2024 National Planning Policy Framework.

- 1.5 Settlement gaps are used as a policy tool in non Green Belt areas to help avoid coalescence and to maintain openness. They do not have the status of green belt policy but draw inspiration from it. All of the above cited documents pre-date the publication of the December 2024 National Planning Policy Framework and updated Planning Practice which has introduced a different approach to green belt in response to the Government's ambition to accelerate economic growth. Paragraph 155 of the Dec 2024 NPPF sets out criteria for growth such as new homes to not be considered inappropriate development in the Green Belt. These criteria include using greybelt land, providing for unmet need, sustainable locations and infrastructure provision. Grey belt is defined as land that does not contribute strongly to 3 out of the 5 purposes of Green Belt. The 2 that are most relevant to Policy NE7 are checking the unrestricted sprawl of large built up areas and preventing neighbouring towns margining into one another. The PPG has recently clarified that the 3 Green Belt purposes that need to be considered in the assessment of whether land is greybelt relate to towns and large built up areas and not to villages. Safeguarding the countryside from encroachment is not a consideration for greybelt.
- 1.6 Although Winchester is not a green belt authority, and the current plan is being examined under a version of the NPPF that pre-dates these changes, it is argued that the Government's new approach to Green Belt and maintaining openness, whilst delivering economic growth remains a material consideration for settlement gap policy owing to Winchester's very significant housing shortfall against the new Standard Methodology local housing targets for the District.
- 1.7 In light of the above, it is argued that there is not robust, up-to date evidence underpinning the Settlement Gap policy NE7 and that the Council be asked to reconsider this policy in light of the government's directions in terms of accommodating growth and maintaining openness.

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?

Response

- 1.8 PNH do not consider that NE7 strikes the right balance between delivering growth and protecting the district's character.
- 1.9 PNH would point to their response to Q4 above but would also argue that it is possible to maintain openness and avoid coalescence without using such large gaps between settlements. Additionally, development can be brought forward in a manner that provides for long term stability of the openness between settlements. This can be done through the provision of in-perpetuity green infrastructure whilst also providing for housing growth.
- 1.10 By way of illustration of this concept, in the case of Denmead, it is argued that the settlement gap functions can be achieved without such a large land take. PNH's Reg 19 submissions identified areas in the current Denmead settlement gap that do not contribute to openness and its undeveloped character. The Vision Statement for Furzeley Village that accompanied PNH's Regulation 19 representations demonstrates the scale of green infrastructure that could be brought forward to help protect the openness between Waterlooville and Denmead, whilst also bringing forward significant housing growth. An extract from the submitted Vision statement showing the provision of an extensive Country Park in the current gap area is included in Appendix 1 to this Statement.
- 1.11 It is PNH's view that the Policy NE7 and supporting evidence should be reviewed in light of:
- needing to deliver significantly higher levels of growth
 - meeting objectives of maintaining distinct settlement character and separation
 - whether such large gaps are necessary to achieve that character maintenance and separation – especially in relation to Denmead.
 - how development can assist with delivering permanent benefits in terms of keeping land open, along with other community benefits.

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?

Response

- 1.12 PNH consider that the settlement gap policy does not sit comfortably in the Biodiversity and Natural Environment chapter of the Plan.
- 1.13 It is noted that the explanatory text to the Policy states that *“the concept of gaps is an established spatial planning tool”* (Emphasis added). Policy NE7 deals with strategic spatial strategy matters. A more logical place for this policy would be as a stand-alone strategic policy, or as part of SP2 which deals with spatial strategy.

Appendix 1: Concept Plan from Furzeley Village showing provision of Country Park



DESIGN PRINCIPLES

 SITE BOUNDARY	 SPINE STREET	 BUFFER PLANTING
 OPEN SPACE	 SECONDARY STREET	➔ GREEN CORRIDOR
 COUNTRY PARK	 EXISTING PROW	
 RESIDENTIAL BLOCK - 35 DPH	➤ INDICATIVE FOOTPATH	
 RESIDENTIAL BLOCK - 30 DPH	 INDICATIVE SUDS	

Appendix 2: