

WINCHESTER LOCAL PLAN EXAMINATION HEARING STATEMENT MATTER 14

Prepared by Pro Vision on behalf of VIVID Homes

April 2025

WINCHESTER LOCAL PLAN EXAMINATION HEARING STATEMENT MATTER 14
PROJECT NO. 51739

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1.0 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 Whilst there is not requirement or encouragement in national policy, identifying settlement gaps is recognised as an established local spatial planning tool in the region, including Winchester.

1.2 Our concern is how the spatial planning tool is (and is not) influencing the development strategy. It is a flexible policy tool that warrants full review when preparing the spatial strategy to meet development needs. We have concerns that the policy tool has not been reviewed effectively, including that its scope and methodology was limited, and it was introduced late in the plan making process, undermining its effectiveness.

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?

1.3 We have raised concerns about the quality of evidence in our previous representations. Despite being described as “a more comprehensive review”¹, the LUC Report appears to be desk based, absent of field work.

1.4 It has not considered the need for development when considering gap boundaries, declaring that this is outside of the scope². We are not aware of any other evidence base documents that have then applied the development need to the settlement gap boundaries, looking for

¹ Review of Settlement Gaps, LUC July 2024 (BNE29); Para 1.4.

² Review of Settlement Gaps, LUC July 2024 (BNE29); Para 3.2 (sixth bullet).

opportunities to make adjustments to deliver development in sustainable locations whilst preserving the purpose of the gaps.

- 1.5 The IIA³ has not considered alternative options that include review of settlement gaps around the main settlements to identify scope for potential urban extensions.
- 1.6 The scope of the evidence around settlement gaps is therefore very limited, undermining its effectiveness in shaping the spatial development strategy.

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

- 1.7 All of the gaps warrant comprehensive assessment in the context of development need over the plan period, especially in the context of a significant part of the district being designated as (and therefore constrained by) National Park.

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?

- 1.8 Our concerns are as summarised in the previous questions; that the approach to the settlement gap policy is deficient and has not effectively informed the spatial strategy in the full context of development needs.

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?

- 1.9 We agree in principle that a settlement gaps policy has an important role to play in the spatial strategy of this region. Our concerns are that the evidence behind NE7 was late in the plan making process (July 2024, around the same time that the development strategy was

³ Integrated Impact Assessment

published⁴), and that the review of the settlement gaps has been undertaken in complete isolation from development needs⁵ and so the development strategy has been formulated without the settlement gap review. Therefore, opportunities to amend gap boundaries to ‘unlock’ development in sustainable locations, whilst preserving the purpose and function of the gaps, have been overlooked.

- 1.10 The IIA⁶ notes a negative impact for policy NE7 against objective IIA6 (Housing)⁷. What appears to be missing in the evidence base is consideration of opportunities to amend settlement gap boundaries to address this negative influence, i.e. the assessment of gaps is tilted towards the environmental protections.
- 1.11 We also briefly refer back to our Regulation 19 representations regarding our concerns over the Neighbourhood plan process at Denmead, which has consciously omitted to consider any sites if they are in the Denmead – Waterlooville settlement gap.
- 1.12 This is further indication that plan making in Winchester has not involved a comprehensive review of the gaps for opportunities to amend boundaries to accommodate development needs in sustainable locations.
- 1.13 VIVID’s interest at Denmead (Site DE22 Land south of Forest Road) has therefore been overlooked, missing the opportunity to consider amending the gap boundaries for the public benefit of meeting more of the housing need, including the unmet needs of neighbouring authorities, especially a significant boost in affordable housing which is declared as a “critical priority”⁸.

⁴ Development Strategy and Site Selection Proposed Submission Plan, July 2024 (SD10a).

⁵ Review of Settlement Gaps, LUC July 2024 (BNE29); Para 3.2 (sixth bullet).

⁶ Integrated Impact Assessment Report (IIA02).

⁷ Integrated Impact Assessment Report (IIA02): Table 5.12 Likely sustainability effects for Policies NE7 to NE9, and paragraph 5.122.

⁸ Local Plan paragraph 9.36 (SD01).

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?

- 1.14 As the LUC Report explains, settlement gaps are a spatial planning tool, so there is justification for a modification to the plan to move this policy in to the Strategic Policy Section. Land included in gaps is not necessarily of high environmental or recreational value.
- 1.15 This issue underlines our concerns that the approach to settlement gaps has lacked clarity and purpose in the process of making this plan, and that the evidence base around it was produced late in the process undermining its effectiveness in positively influencing the spatial development strategy.
- 1.16 The negative impact of the policy on the objective to deliver housing needs (identified in the IIA, as noted above) has therefore not been addressed, despite it being a flexible policy tool.
- 1.17 A review of the gap boundaries in the context of the development needs is missing.

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?

- 1.18 We have no comment at this stage.

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

- 1.19 We have no comment at this stage.