

Briefing Note

Project:	Winchester Settlement Gap	Date:	27 September 24
Subject:	Review	Reference:	247817 Rev A

Introduction

tor&co has been appointed by Bargate Homes to undertake an independent review of Winchester City Council's Settlement Gap Review, prepared by LUC in July 2024.

This review is desk-based, appraising published documents and reports pertaining to settlement gaps, including comparable studies prepared for the South Hampshire sub-region. A site visit to the settlement gaps assessed by Winchester Council was not undertaken, as such this review doesn't comment on the specific findings for each of the settlement gaps, but rather appraises the general approach and methodology adopted by LUC.

This review first considered the evidence base, policy context and published guidance, before critiquing the report's approach, methodology and conformity with best practice. This review was undertaken by a chartered Landscape Architect.

Overview

The July 2024 Settlement Gap Review by LUC (hereafter referred to as the LUC Review) has been prepared to support the definition of settlement gaps and the potential for alterations of the gap boundaries for the emerging Winchester 2020-2040 local plan.

Paragraph 1.4 of the LUC Review, states:

"The need to review the settlement gaps defined in the current Local Plan was set out in the Local Plan Part 1 (2013), which indicated (at paragraph 9.48) that "any detailed review of the boundaries of these gaps will be undertaken in future Local Plan Part 2 or a Neighbourhood Plan, in accordance with the principles contained in the PUSH Policy Framework for Gaps." The Local Plan Part 2 (2017) included a partial review of settlement gaps but the Council are now at a stage to be able to undertake a more comprehensive review."

Therefore, while the LUC Review is based on proceeding settlement gap studies (dating back to County Structure Plans), it is relevant to note that the report was envisaged as a 'comprehensive review' that would form the principal evidence base to support the emerging local plan policy on Settlement Gaps (draft policy NE7). No reference is made to subsequent studies within the LUC 2024 Report. As such, it is understood that the 'project scope' is intended to be comprehensive and subsequent assessment work is not proposed to augment the key findings.

The LUC Review rightly notes “*there is no specific, recognised guidance for the assessment of settlement gaps*” (para 3.2). The report also correctly references PfSH’s 2023 Spatial Position Statement and the PUSH 2008 Policy Framework for Gaps as providing the regional framework and overarching non statutory guidance, which is intended to ensure a consistent approach to assessing settlement gaps across the Hampshire sub-region.

The Partnership for South Hampshire (PfSH) includes the unitary authorities of Portsmouth, Southampton; Hampshire County Council and the district authorities of Eastleigh, East Hampshire, Fareham, Gosport, Havant, New Forest, New Forest National Park Authority, Test Valley and Winchester.

While there is no definitive methodology for settlement gaps, a number of assessments have been prepared by the local authorities listed above (within the South Hampshire sub-region). These have been referred to in order to determine a best practice approach to settlement gap assessments, with the following two recent studies specifically referenced:

- Eastleigh Borough Settlement Gap Study, October 2020 (Deacon Design)
- Test Valley Borough Council: Local Gap Assessment, December 2023 (Stephenson Halliday)

Policy Context and Regional Guidance

The PUSH 2008 Policy Framework for Gaps set out the key criteria that should be used by local planning authorities to select locations for the designation of gaps in South Hampshire, namely:

- *The open nature/sense of separation between settlement cannot retained by other policy designations;*
- *The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence.*
- *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.*

The guidance goes on to state:

“Local Development Documents will identify the location of the gap(s) and include a policy and ancillary documentation which show on an Ordnance Survey map base the extent of land included within the gap(s). The policy will set out the types of development which will be permitted within the gap(s) based on the principle that development within Gaps will only be permitted if:-

a) it would not diminish the physical and/or visual separation of settlements; and

b) it would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.”

PfSH December 2023 Spatial Position Statement, provides more up to date guidance. Para 6.101 states: *'Strategic Gaps (also known as Settlement Gaps) should be defined in local plans where necessary to prevent coalescence and to protect the identity and landscape setting of distinct settlements.'*

The guidance goes on to state under SPS12:

SPS12: STRATEGIC PRINCIPLES FOR STRATEGIC/SETTLEMENT GAPS

Strategic countryside gaps between settlements are important in maintaining the sense of place, settlement identity and countryside setting for the sub-region and local communities.

The Meon Valley is identified as a strategic gap of sub-regional strategic significance and should be protected from inappropriate development.

In addition to this area, Councils should identify in their local plans other strategic countryside gaps of sub-regional significance as appropriate; and may also identify local countryside gaps which are of fundamental local importance in their area.

The precise extent of the Meon and other gaps will be defined in local plans.

Given the long-term need for development, the number and extent of gaps should only be that needed to achieve their purpose.

No reference is made to settlement gaps (strategic or local) within the NPPF and there is no requirement for local authorities to allocate them as part of the plan making process. Hampshire County Council had, however, previously designated strategic gaps through various iterations of Structure Plans and, along with local gaps, these were later incorporated within local plans, including Winchester City Council's adopted local plan (parts 1 and 2). The principle of including settlement gaps within local plans has been tested and was found by the Inspector to be in line with national policy as part of the examination into the Test Valley Revised Local Plan dated 15 December 2015.

The 2013 Winchester District Local Plan Part 1 Joint Core Strategy combined 'strategic' and 'local' gap and referred to them as settlement gaps. Local Plan Policy CP18 (contained in Part 1) is the current policy for Settlement Gaps, which is referenced in full within the LUC Review.

The emerging Winchester Local Plan has carried forward the settlement gaps under Policy NE7, which is currently drafted (Online version: Reg 19 Proposed Submission Local Plan 2020 -2040) as follows:

"The local planning authority will retain the generally open and undeveloped nature of the following defined settlement gaps:

- i. Bishop's Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath*
- ii. Denmead – Waterlooville*
- iii. Kings Worthy - Abbots Worthy*

- iv. Otterbourne – Southdown
- v. Winchester – Compton Street
- vi. Winchester – Kings Worthy/Headbourne Worthy
- vii. Winchester – Littleton
- viii. Whiteley – Fareham/Fareham Western Wards (the ‘Meon Gap’)
- ix. Knowle, Wickham and Welborne”

Within these areas only development that does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements will be permitted. Any development should not threaten the generally open and undeveloped nature of the gap and avoid coalescence.”

tor&co Review

Based on the above policy context and sub-regional guidance, tor&co’s review of Winchester City Council’s Settlement Gap Review, prepared by LUC in July 2024 has determined the following.

LUC Review: Approach

In paragraph 3.2 of the LUC Review the approach to the assessment is set out. The approach is not clear, in particular the first bullet which states:

- Define an area of assessment encompassing all land where development has some degree of potential to reduce separation. This includes all land between settlements rather than just the land currently defined as settlement gaps

The underlined text is either replicating the approach set out under bullet 4 or it is referring to a wider area of study ‘between settlements’. If it is the latter, the statement would appear to contradict the statements under para.1.9 which confirms that the Council (rather than LUC’s study) discounted considering establishing other gaps on the ‘basis of distance between settlements, extent current development proposals and the level of protection provided by other Natural Environment policies’

The LUC Review provides no information on this, but para. 1.10 confirms that the Council will review this position if and when new masterplans come forward. This raises the potential of new settlement gaps being created in the future in response to a new development proposal, rather the 2024 LUC Review providing a comprehensive re-appraisal of settlement gaps now that can provide a ‘definitive’ spatial strategy for the duration of the emerging local plan.

Indeed, the study only re-appraises 7 or 9 existing settlement gaps and does not consider at all other land between settlements within the wider district.

In para. 1.4, the LUC Review highlights that Local Plan Part 2 (2017) included a partial review of settlement gaps, but no information is provided on the scope of this partial review or its findings. It is not clear if, or how, this informed the subsequent 2024 assessment by LUC.

The policy context with the LUC Review provides a reasonably complete summary. It is noted, however, that the wording for the Policy NE7 as drafted is different to the online Reg 18 and Reg 19 versions of the 2020-2040 local plan.

The extract within the LUC Review includes the wording '*Any development should not cause harm to the character and landscape of the area.*' This statement appears at odds with agreed stated purpose of settlement gaps which is not to protect valued landscapes or their character, but rather settlement separation and identity.

The LUC Review recommended in the Policy recommendations (page 38) that this sentence be omitted from Policy NE7, which this review concurs with. It is noted that it has been omitted in the Reg 19 version of Policy NE7.

The section on Reg 18 Consultant responses (page 11) is extremely brief, and does not appear to have influenced the approach to the assessment.

Appeal decisions are referenced in para.2.6, but no information is provided. By comparison, a comprehensive summary of planning appeals is provided within chapter 3 of the Test Valley Borough Council: Local Gap Assessment.

LUC Review: Methodology

There are a number of issues associated with the methodology. Some of these appear to be drafting errors, but several are more fundamental to the way the assessment has been undertaken.

The text on Approach and Evaluation is repeated (pages 16 and 17). Text is repeated again at paragraphs 4.23 to 4.24.

There is not a comprehensive summary of source material, including a list of existing baseline reports that informed the assessment, such as landscape character and sensitivity studies, ecology and conservation appraisals, local design guides or neighbourhood plans and supporting studies.

The LUC Review includes a single plan for each settlement gap assessment within appendix A. There are no supporting baseline plan, photographs or analytical plans to support the conclusions. For example, topography is often referenced as being a decisive factor in terms of intervisibility and the perception of separation, but no plans are provided to portray this or highlight key features, such as ridgelines.

The assessment appears to be solely desk-based, with no site visit or fieldwork analysis undertaken (although the methodology is not clear on this). The absence of any fieldwork is considered to be a significant omission and draws into question the validity of the report's findings. As noted later, in particular this raises concerns regarding the methodology adopted to appraise '*the strength of each gap, taking into consideration its contribution to settlement setting, the degree of physical and visual separation it provides, and the extent of urbanising influences.*' (bullet two of the approach to appraising gaps on page 14).

By comparison, the methodology adopted for the Eastleigh Borough Settlement Gap Study, October 2020 (Deacon Design), included a simple phased approach, starting

with desktop analysis, followed by fieldwork and concluding with the analysis evaluation stage. With respect to the fieldwork, the methodology on page 9 of the Eastleigh Borough Settlement Gap Study states:

“Once the desktop study was complete the assessment team carried out fieldwork to verify the findings of the desktop study and capture a visual and perceptual survey of the Gaps. Maps and plans prepared during the desktop study were annotated with additional field survey findings.

Following the fieldwork, final annotated maps, descriptions and characterisation of Gaps including the relevant settlement edges were prepared.”

The fieldwork included a photographic survey, and states:

‘Photographs were recorded from key viewpoints, especially from settlement edges, to illustrate the character of the Gaps and the visual perception of settlement separation and Gap openness. Photographs were taken within and outside the Gaps to illustrate potential changes to Gap boundaries and the minimal distances required to prevent visual coalescence of settlements with each other or other urbanising elements within the Gaps.’

The Test Valley Borough Council: Local Gap 2023 Assessment similarly included fieldwork analysis, the purpose of which was to verify the initial findings of the desktop study.

Para.2.1.12 of that report states:

‘Fieldwork, reporting and recommendations: *This stage used the assessment proforma in the field to gather data and evidence in relation to the existing Local Gaps, to test the baseline gathered in the above desk study, to confirm boundaries and identify opportunities with respect to enhancement, integration and mitigation potential. Field survey was supported by the taking of geo-located digital photographs as part of the evidence base.’*

These critical assessment techniques and stages do not appear to have been completed by LUC. Indeed, there is very little information on how key factors such as inter-visibility, visual separation or the extent of urbanising features has been assessed. The criteria outlined within the methodology appear to be based solely on the information contained on the Settlement Gap Review plans in appendix A and it is assumed reference to Google Maps (although this is also not stated). The Eastleigh and Test Valley assessment are, by comparison, transparent about what was assessed at each stage of the process.

How landscape factors, landscape value, landscape character, visual amenity and landscape sensitivity have informed the assessment is not clear, with no reference to supporting assessments such as the relevant LCA or settlements descriptions.

The Landscape Institute’s Guidelines for Landscape and Visual Impact Assessment (GLVIA) 3rd Edition is not referenced. Whilst the GLVIA is not directly relevant to the assessment of settlement gaps, its guiding principles help with identifying, understanding and assessing the character and value of a landscape, alongside

published landscape character areas (LCA). In describing landscape, paragraph 2.19 of the GLVIA states that, *“Landscape results from the interplay of the physical, natural and cultural components of our surroundings. Different combinations of these elements and their spatial distribution create the distinctive character of landscapes in different places, allowing different landscapes to be mapped, analysed and described. Character is not just about the physical elements and features that make up a landscape, but also embraces the aesthetic, perceptual and experiential aspects of the landscape that make different places distinctive.”*

GLVIA also emphasises the importance of adopting and recording a *transparent methodology*. The LUC Review is sub-standard in this regard.

While measurements of settlement gaps are stated, distances are not consistently noted or shown on any of the supporting plans. While this is only one factor that should be considered, a systematic analysis of each gap should have been adopted.

Para 3.11 states *“the evaluation for each gap uses professional judgement to weigh up three aspects of settlement separation”*. It is not stated if this was a professional Landscape Architect or another suitably qualified professional.

Para. **3.13 states** *“Gaps were assessed on the assumption that allocated sites will be developed in accordance with Local Plan policies. Where development has been consented, consideration was given to any masterplans when assessing the role of boundary features in maintaining settlement separation.”*

The report provides no information on consented masterplans other than to plot the allocation on the plans in appendix A. It is not clear therefore if factors such as the spatial arrangement of a masterplan or scale of built form has been factored in. By way of example, for the Winchester – Kings Worthy – Headbourne Worthy Gap (pages 75 to 79), Barton Farm represents a major new development area that is substantially built-out. No information on the development is provided to support the summary text or conclusions.

In terms of physical and visual separation, para 3.16, first bullet concludes by stating *“A very visible, strongly defined development edge would not typically be considered a strong boundary to further development, but if it was a consistent boundary over some distance that would increase its contribution.”*

A strongly defined boundary is, in nearly all instances, more likely to create a definitive settlement edge than an ill- defined, weak development edge. How visible the development edge is separate factor, but must be appraised on a site-specific basis rather than as a generic principle as noted above. These factors can only be adequately appraised by undertaking fieldwork, which does not appear to have been the case.

Conclusion

The recommendations currently do not relate back to the key PUSH guidance or LUC initial evaluation process of settlement setting/physical and visual separation/urbanising influences. The LUC Review use different sub headings of 'gap strength' and or 'key characteristics of settlement gap' or 'gap strength and key characteristics'.

Overall there is a lack of response to original scope of the review which was to 'consider evidence to support the definition of settlement gaps and the potential for alterations of the gap boundaries'.

No commentary or reassessment has been carried out of the previous settlement assessments undertaken to inform Policy CP18 of the 2013 Local Plan.

The report does not clarify whether all or part of the current settlement gaps perform in accordance with the 'definition' of a settlement gap in order to make judgements as to whether the boundaries should be adjusted, either expanding or reducing.

The definition (of evaluation of the appropriateness) of a settlement gap should be judged against the criteria set out by PfSH. By example, the Eastleigh Settlement Gap study attempted to do this with a criteria check table.

There is not a comprehensive summary of the source material referenced to inform the assessment.

There are several issues with the methodology adopted, as detailed above. The apparent absence of any fieldwork and supporting plans / photographs to verify the desk-based findings is considered to be a significant flaw in the assessment process, and raises material concerns regarding the validity of the key findings.