

## Privacy and publication

We are unable to legally accept anonymous submissions to the consultation. You must therefore provide your consent below before you are able to submit your response.

### Privacy Notice

Any personal information that you supply to Winchester City Council will only be used for the purposes of the work required to prepare a Local Plan under the Planning Acts. We need to collect this information in order to maintain accurate records to ensure that you can be properly involved in the preparation of the Local Plan. This will include general updates on the progress on the Local Plan, sending updates/surveys/newsletters, inviting comments on the Local Plan as it moves through its statutory stages and being notified of the date of the Local Plan Examination and be invited by the Inspector to speak at the Local Plan Examination. Any comments that are received in connection with the Local Plan will be published but they will only display the person/organisation name and postcode beside them. Any information that is received, including contact details, will only be kept until the Local Plan is adopted.

As part of our statutory functions, we will share data with the Planning Inspectorate who will hold the Public Examination on behalf of the Ministry of Housing, Communities and Local Government. You have the right to see what information is held about you, to have inaccurate information corrected, to have information removed from our system unless we are required by law or a statutory purpose to keep it and the right to complain to our Data Protection Officer if you feel that your data has not been handled in accordance with the law.

Further information about how Winchester City Council uses personal information can be found on our website at [www.winchester.gov.uk/strategies-and-policies/privacy-policy](http://www.winchester.gov.uk/strategies-and-policies/privacy-policy).

#### 1. Please confirm that you have read and understood the above.

(Required)

## About you

Please add your personal details below. If you are acting as an agent, please also fill in your details where requested below.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publicly available, therefore we cannot accept anonymous representations. The Council will publish names and associated representations on its website but will not publish personal information such as telephone numbers, or email addresses.

You must fill in these details before you can submit the form.

### 2. What is your full name or client's name if acting as an agent?

Name of respondent (or client): (Required)

### 3. If you are representing an organisation or acting as an agent, please provide the name below.

Organisation/Agent:

### 4. What is your address?

If you are responding on behalf of an organisation, please put the organisation's address below. If you are acting as an agent, please put the company address below.

House number/name: (Required)

Street address 1: (Required)

Street address 2:

Town/area: (Required)

Postcode: (Required)

**5. What is your email address?**

Email address:

**6. What is your phone number?**

(Required)

Phone number:

**7. By submitting this form I acknowledge that;**

- a) my response, together with supporting information, which includes my name, address and contact details will be sent to the Local Plan Examination Programme Officer and the Planning Inspectorate; and**
- b) my name will be published, together with my response, in the Winchester City Council Local Plan Examination website.**

**8. Please select the box below if you would like to be kept up to date on the developments to the Local Plan via the email you have provided?**

- Yes, I would like to be kept up to date with Local Plan developments
- No

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

NE7
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**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

<p>Policy NE7 aims to preserve the generally open and undeveloped nature of identified settlement gaps. It lists nine gaps, carried forward from the current Local Plan. The Regulation 19 consultation is supported by a Settlement Gap Review (July 2024), conducted by LUC. Regarding the Knowle-Wickham-Welborne Gap, the review states:</p> <p><i>“The remaining two settlement gaps – between Knowle, Wickham and Welborne, and between Winchester and Littleton – have not been assessed. The Welborne settlement gap has not been included in the Settlement Gap Review because planning permission has already been granted for the Welborne development at Fareham. The land between Welborne and the existing settlements of Fareham, Funtley, Knowle, and Wickham is designated as settlement buffers for open green infrastructure, in accordance with Policies WEL5 and WEL29 (Fareham Local Plan Part 3: The Welborne Plan). This existing designation and planning framework ensure that the separation and integrity of these settlements are maintained, making further study of this settlement gap unnecessary at this moment in time.”</i></p> <p>Our client has significant concerns that the decision to exclude the Knowle-Wickham-Welborne settlement gap from the Settlement Gap Review lacks clear justification and accordingly the gap as drawn cannot be said to be justified and effective. We would therefore urge the Council to expand the review to include the Knowle, Wickham and Welborne gap, and the Winchester and Littleton gap for the same reason.</p>
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The justification given for excluding the Knowle, Wickham and Welborne gap from the review are policies contained within the Fareham Local Plan. These are:

Policy WEL5 – Maintaining Settlement Separation – specifically applies to the Welborne allocation. It requires development proposals to respect and maintain the physical and visual separation of Welborne from adjoining settlements (Fareham, Funtley, Knowle, and Wickham), protecting the individual character and identity of each settlement. For settlements in Winchester District, Policy WEL5 of the Fareham Local Plan includes the following provisions:

**Knowle:** Land within the Welborne Plan boundary, adjacent to Knowle and Ravenswood House Hospital, with a minimum width of 50 metres, is allocated as a settlement buffer. Development adjacent to this buffer will only be permitted if it maintains the integrity of the buffer and protects the ancient woodland remnants at the boundary of Knowle Triangle. Fareham Borough Council and Winchester City Council will collaborate to ensure that the Knowle Triangle serves as both green infrastructure and a settlement buffer in a way consistent with the Winchester Local Plan.

**Wickham:** Land within the Welborne Plan boundary, comprising Blakes Copse, the rear of properties on Hoads Hill, and the northernmost edge of the Welborne site (50 metres in width), is allocated as a settlement buffer.

Policy WEL29 relates to on-site green infrastructure and does not impact settlement gaps within Winchester District.

Neither policy in the adopted Fareham Local Plan has any relevance to the extent of a settlement gap within Winchester District. Therefore, the justification provided is totally insufficient.

Considering the importance of undertaking a full and comprehensive review of settlement gaps, it is worth reflecting on the Inspector's findings during the examination of the Eastleigh Local Plan (2011-2029). In his Post Hearing Note 3 – Other Matters to the Council, the Inspector raised concerns about the settlement gap policy, noting:

*"I have seen nothing in the Council's evidence base that justifies, on a rigorous and comprehensive basis, the need for a gap designation, the choice of gap locations, or the extent of the designated areas."*

The Inspector further noted that even if the principle of settlement gaps is accepted, the criteria in Policy 15 of the South Hampshire Strategy would be a reasonable starting point for determining their extent. Policy 15 asserts that no more land than necessary to prevent coalescence should be included in settlement gaps. Although further guidance has since been published by the Partnership

for South Hampshire (PfSH), the principles remain consistent. Notably these are set out in paragraph 7.61 of the Regulation 19 Local Plan.

The Settlement Gap Review explains that LUC's approach is based on past experience in settlement gap studies and aligns with the roles of settlement gaps as outlined in PfSH's 2023 Spatial Position Statement and the 2008 Policy Framework for Gaps. The review includes a robust methodology, analysing factors such as settlement setting, physical and visual separation, and urbanising influences, to determine the extent to which land is distinct from urban areas. This analysis identifies key factors that preserve settlement separation, offering recommendations for which land should be included in each designated gap to prevent coalescence. This approach is supported by our client. However, the decision not to assess the Knowle-Wickham-Welborne Gap in this study lacks technical rigor and is unjustified and so our client **strongly objects** to Policy NE7 in its current form.

Notably, the Knowle-Wickham-Welborne Gap was defined in Local Plan Part 2 (LPP2) before the application at Welborne had been determined and therefore prior to knowing its form, layout and design. As a result, the settlement gap conditions at the time of designation may not reflect today's circumstances. The initial gap designation was likely larger than necessary, reflecting a precautionary approach due to the uncertainties surrounding Welborne's exact parameters.

We also have concerns that the reliance on outdated evidence to justify settlement gaps is also inconsistent with the Local Plan's reliance on windfall development to meet housing needs. As noted by previous representations, windfall sites within settlement boundaries are a diminishing resource.

Table H2 of the PSLP shows that after existing completions, planning permissions and other commitments, the remaining requirement totals 4,770 new dwellings to be delivered through the plan. Of this, only 2,875 dwellings will be provided through additional local plan allocations. This equates to 60% of the remaining requirement while 1,985 dwellings will be delivered through windfall development. This equates to 40% of the remaining requirement and demonstrates an even greater reliance on windfall development than that proposed through the Regulation 18 plan. Our client **strongly objects** to this strategy. This is because without allowing for some expansion of settlement boundaries, suitable windfall development opportunities will become increasingly limited, prejudicing the Council's ability to fulfil this strategy. In the case of Knowle and Wickham where there is a windfall requirement of 50 dwellings, the decision not to review the settlement boundary compounds this issue and emphasises the need to undertake a full review of the proposed gap.

Therefore, our client **strongly objects** to the inclusion of settlement gaps without a full up-to-date, evidence-based assessment to justify their designation, location, and extent.

Please make sure that you put in all the evidence and information needed to support your representation.

**What modification(s) are necessary to make the policy legally compliant or sound?**

It is crucial that the Knowle-Wickham-Welborne Gap is reviewed with the same rigor as other settlement gaps in Winchester District. This will ensure that the extent of the gap is both justified and effective, and importantly that no more land than is necessary to prevent the coalescence of settlements is included to maintain their physical and visual separation.

In addition, the specific wording of Policy NE7 is overly restrictive in its reference to the "open and undeveloped nature" of gaps. This phrasing is not considered consistent with national policy or justified. Modifications are needed to clearly define settlement gaps within Winchester District. We recommend rewording the policy to adopt a positive, criteria-based approach to development within settlement gaps. This would ensure the policy focuses on the key functions of settlement gaps, grounded in proportionate and up-to-date evidence, making it both justified and effective.

**What is your suggested wording or text for the policy:**

In the absence of a comprehensive review, our client contends that the Knowle-Wickham-Welborne settlement gap is unjustified, as it includes more land than is necessary to prevent settlement coalescence and maintain physical and visual separation between the settlements. Figure 1 below shows our suggested amendments to the settlement that are considered necessary.

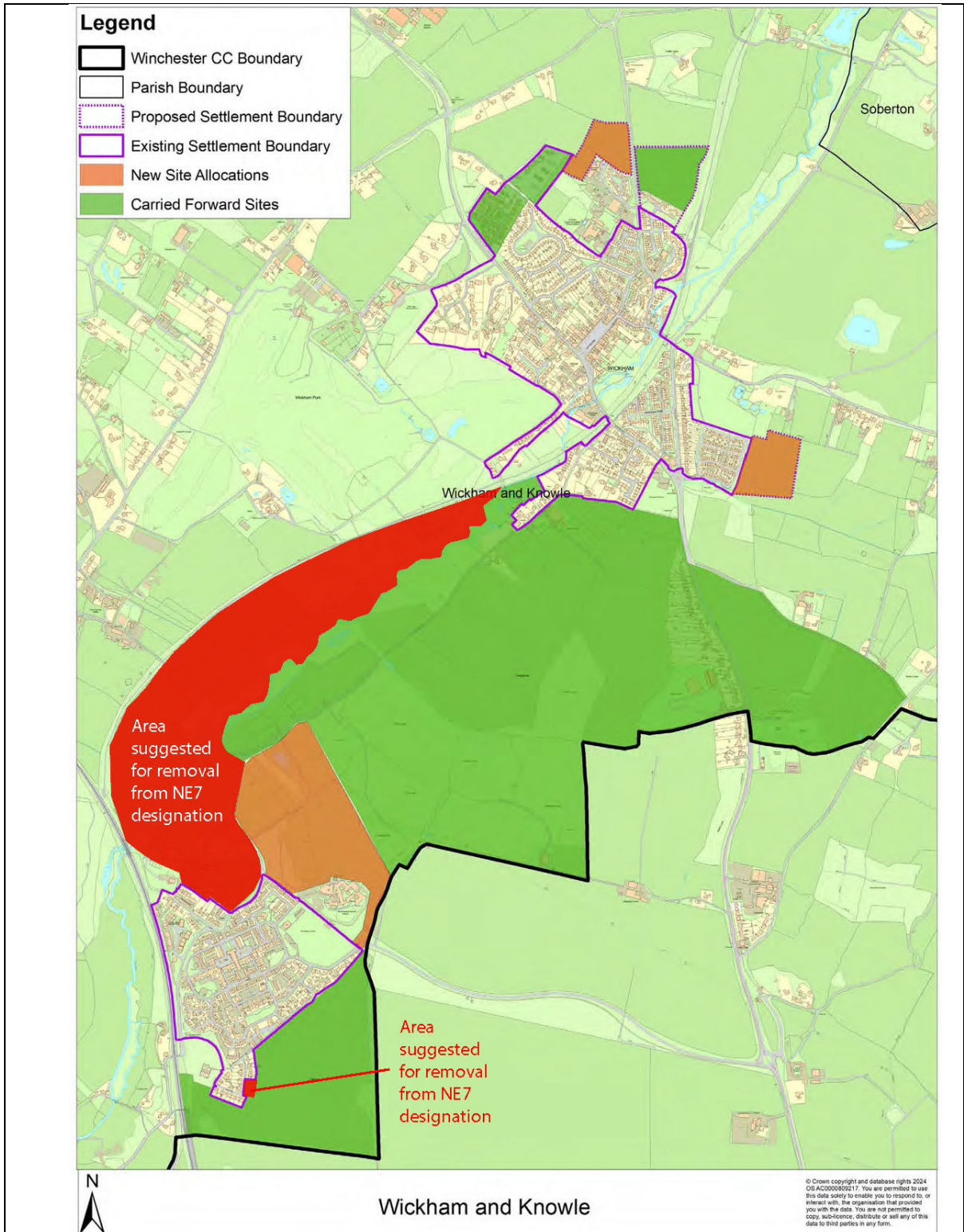


Figure 1: Suggested amendments to NE7 Knowle-Wickham-Welborne Settlement Gap

**Land west of Mayles Lane**

The inclusion of Site KN1 (Ravenswood) is a key consideration to the suggested amendments above. Since the previous Local Plan defined the settlement boundary, the northern boundary of



Knowle village has been substantially extended. As a result, the land to the northwest of Knowle and west of the Ravenswood allocation has become isolated from the wider settlement gap, diminishing its contribution to the gap's function compared to when it was originally assessed.

Furthermore, the Meon River and the associated vegetation along its banks provide a robust and defensible boundary that would better define the western edge of the settlement gap. The land beyond the river is located entirely within the countryside, separated from the settlement boundaries of Knowle and Wickham by the watercourse and intervening vegetation. While this land may have some visual connection to the area east of the Meon, the existing countryside policies are considered sufficient to preserve the character of the area without the need to include this land within the settlement gap, thus preventing any dilution of its purpose.

Finally, the land west of Mayles Lane and south of Wickham Lodge, which follows the northern boundary of the Ravenswood development and the alignment of existing overhead power lines, comprises a mix of established uses, including commercial operations (such as our client's business at Pogles Wood and other businesses at Meon Valley Landscapes), Growing Places Children's Nursery, and a sewage treatment facility. These land uses create a developed character that aligns more closely with the defined settlement boundary of Knowle. This area is now disconnected from the wider settlement gap and no longer plays a significant role in defining settlement character or in maintaining the separation of settlements, making its inclusion in the settlement gap unnecessary.

#### **Land at Dean Villas**

The land at Dean Villas should be excluded from the designated settlement gap as it is physically and functionally distinct from the land known as Knowle Triangle and relates more closely to the defined settlement boundary of Knowle. Unlike the wider settlement gap, which plays a critical role in preventing coalescence between Knowle and surrounding settlements, this site is separated from the core open space that constitutes the Knowle Triangle and is effectively integrated with the adjacent built-up area. Its exclusion from the settlement gap would not undermine the overall function of the gap, as the revised eastern boundary would align with the established domestic curtilages of the residential properties that border the site. This adjustment would preserve the primary purpose of the settlement gap in maintaining physical and visual separation between settlements.

Moreover, the inclusion of the Dean Villas site within the settlement boundary for Knowle would provide a logical extension to the village, aligning with existing development patterns and creating opportunities for windfall development. The Regulation 19 Local Plan for Winchester relies on such windfall sites to meet its housing targets, and expanding the settlement boundary to incorporate this site would help ensure a sustainable supply of new homes. Given the diminishing availability of windfall sites within existing settlement boundaries, this adjustment would contribute positively to

housing delivery without compromising the strategic objectives of settlement gap policies. Accordingly, we recommend that the settlement boundary for Knowle be expanded to include the Dean Villas site, supporting both local development needs and the overarching goals of the Local Plan.

Finally, we recommend rewording the policy to adopt a positive, criteria-based approach to development within settlement gaps. This would ensure the policy focuses on the key functions of settlement gaps, grounded in proportionate and up-to-date evidence, making it both justified and effective.

**The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination. If the Inspector invites you, do you consider it necessary to participate in the examination hearing sessions?**

(Required)

Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

No, I don't want to take part in a hearing session

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**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

MK3

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Policy MK3 (Welborne Open Space), which seeks to maintain the open and rural character of the land and secure its long-term management, represents an unnecessary duplication of Policy NE7, which subject to a comprehensive review will provide robust protection for settlement gaps, including the preservation of open, undeveloped land. Both policies effectively aim to prevent coalescence and safeguard the distinctiveness of settlements through similar provisions. This redundancy not only complicates the policy framework but also compounds the issues identified with Policy NE7, particularly the lack of up-to-date evidence to justify the extent and boundaries of the settlement gap. By overlapping the objectives of Policy NE7, Policy MK3 risks imposing duplicative restrictions that are both unjustified and ineffective. Deleting Policy MK3 would streamline the Local Plan, ensuring that the focus remains on a single, coherent policy that is properly evidenced and capable of delivering its objectives without unnecessary complexity or duplication.

Please make sure that you put in all the evidence and information needed to support your representation.

**What modification(s) are necessary to make the policy legally compliant or sound?**

Policy MK3 should be deleted for the reasons give above.

**What is your suggested wording or text for the policy:**

Policy MK3 should be deleted for the reasons give above.

**The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination. If the Inspector invites you, do you consider it necessary to participate in the examination hearing sessions?**

(Required)

Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

No, I don't want to take part in a hearing session