



ALFRED HOMES

## **Hearing Statement**

### **Matter 2**

**Whether the spatial strategy and distribution of  
development is positively prepared, justified, effective and  
consistent with National Policy**

**Winchester District Local Plan 2040 Examination in Public**

**April 2025**



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### 1. Executive Summary

- 1.1. The Hearing Statement addresses Question 1 in respect of Matter 2, focusing on the approach taken by the LPA in preparing its Settlement Hierarchy, concluding that the approach cannot be considered 'justified' when considered against reasonable alternatives, and to be considered sound, a Modification to the Plan would be required.
- 1.2. The Hearing Statement focuses on the Village of Littleton and the wider Parish of Littleton & Harestock, which encompasses both the Village and the northern part of the City of Winchester. The starting point is that Littleton is categorised by the LPA as one of the least sustainable settlement in the District, scoring 13 in its assessment, and classed as a 'Small Rural Settlement' within the Settlement Hierarchy Paper (August 2024).
- 1.3. The Hearing Statement challenges the soundness of this conclusion on four principal grounds:
  - The absence of recognition of 'linked settlements' and shared services and facilities within the Settlement Hierarchy Assessment
  - The inconsistent approach in the methodology used in respect of West of Waterlooville (Newlands)
  - The absence of consistency in respect of the allocation of the Sir John Moore Barracks for 750-1,000 dwellings at Littleton, and,
  - The resulting skewed conclusions on the sustainable merits of settlements in comparison to Littleton and resulting Brownfield v Greenfield allocations in response to Question 6.
- 1.4. As a result of an unjust and inconsistent approach, a **2.4ha brownfield site** abutting the settlement boundary referred to as Littleton Nursery, has been overlooked for allocation in favour of Greenfield Allocations on the grounds of the Village being defined as one of the 'Smaller Rural Settlements'.



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2. Question 1: The Settlement Hierarchy Review (2024) scores settlements and groups them which provides the settlement hierarchy in the District. Is the methodology used robust and the outcomes accurate? Is the distribution of development between the tiers of settlements justified and how has it been established?
- 2.1 The methodology used as part of the updating and publication of the Settlement Hierarchy is a fundamental component of the soundness of the Plan, the outputs of which inform the spatial strategy as a whole.
- 2.2 By way of background, Littleton is the closest Village to the City of Winchester, with a separation distance of less than 800m at its closest point and the Parish Council covering both the Village and the northern part of the City, recognising the close functional relationship between the two areas.

### Linked Settlements / Accessible Services beyond Settlement Boundary

- 2.3 As per Para 3.4 of the Settlement Hierarchy Background Paper (August 2024), the Council acknowledge that previously, assessments of services and facilities that informed the Settlement Hierarchy included the;

***‘Presence of various services and facilities – based upon a survey of all roads extending 1.6km from the edge of each settlement (Para 5.2), with some more frequently used or valued services receiving double weighting’. (Ref DS.01 Para 3.4)***

- 2.4 This methodology was used in the Adopted Local Plan, but also in the ‘Review of Facilities and Services to inform the Settlement hierarchy 2021’ Report, to inform the current Local Plan Review. As per Figure 1, the conclusions of this assessment gave Littleton a score of **22 points**, placing it in the third tier of settlements (Table 2, P.11 – see Appendix 1 for extract), with the LPA recognising the benefits of the linked Services and Facilities within the City of Winchester.



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- 2.5 This is a sound approach given some services and facilities relied upon by a population may be a short distance outside of the defined settlement boundary, and was an approach clearly supported by the LPA during the formation of the last Local Plan and the previous iterations of the current Local Plan Review during its evidence gathering.

**Figure 1: Extract from Settlement Hierarchy Review 2021**

Settlement	Retail	Education	Medical	Facilities	Recreation	Transport	Employment	Infrastructure	Score
	Supermarket (>400m <sup>2</sup> trading floor space) Convenience Store (<400m <sup>2</sup> trading floor space) Other Convenience Retail (Daily Needs)	Pre School/Nursery Primary School (Including Infant and Junior) Secondary School Other Education Establishment	Doctors Dentist Opticians	Library Petrol Station Community/ Village Hall Post Office Chemist Bank Café/Restaurant Pub/Social Club Take Away Church	Children's Play Area Outdoor Sports Facilities Other Parks or Open Space Built Leisure	Daily Bus Services (Hourly) Daily Bus Services (Infrequent) Weekly Bus Services Main Line Train Station (Frequent) Main Line Train Station (Infrequent)	Office Warehouse Workshop Mains Gas Mains Drainage High Speed Broadband Renewable Energy Facility		
Littleton	0 0 0	2 2 0 0	0 0 0	0 0 1 0 0 0 0 1 0 1	1 1 1 1 0	0 2 0 0 0	2 0 2	2 2 2 0	22
Curdridge	0 0 0	1 1 0 0	0 0 0	0 0 1 0 0 0 0 1 0 1	1 1 1 1 0	3 0 0 0 0	2 2 2	1 1 2 0	21
Hursley	0 0 1	2 2 0 0	0 0 0	0 0 1 2 0 0 0 1 0 1	1 1 1 1 0	3 0 0 0 0	2 0 0	1 1 1 0	21
Southwick	0 0 1	0 0 0 0	0 0 0	1 0 1 0 0 0 0 1 0 1	0 0 1 0 0	0 0 1 0 0	2 2 2	2 2 2 0	19
Shedfield	0 0 1	2 0 0 0	0 0 0	0 0 0 0 0 0 0 1 0 1	1 0 1 1 0	3 0 0 0 0	0 0 2	2 2 2 0	18
Bishops Sutton	0 0 0	0 0 0 0	0 0 0	0 0 1 0 0 0 0 1 0 1	0 0 0 0 0	3 0 0 0 0	0 2 2	2 2 2 0	16
Compton Street	0 0 0	2 2 0 0	0 0 0	0 0 0 0 0 0 0 0 0 1	1 0 1 1 0	3 0 0 0 0	0 0 0	2 2 2 0	16
Durley	0 0 0	0 2 0 0	0 0 0	0 0 1 0 0 0 0 0 0 1	1 1 1 1 0	0 0 0 0 0	0 2 2	1 1 0 2	15
Newtown	0 0 0	0 2 0 0	0 0 0	0 0 1 2 0 0 0 1 0 1	0 0 1 1 0	0 0 1 0 0	0 2 2	0 0 2 0	15
Headbourne Worthey	0 0 0	0 0 0 0	0 0 0	0 0 0 0 0 0 1 0 0 1	0 0 1 0 0	3 0 0 0 0	0 0 2	2 2 2 0	14
Micheldever	0 1 0	0 2 0 0	0 0 0	0 0 1 0 0 0 0 1 0 1	1 1 1 1 0	0 0 1 0 0	0 0 0	1 1 2 0	14
Otterbourne Hill	0 0 0	2 0 0 0	0 0 0	0 0 0 0 0 0 0 1 0 0	1 0 1 1 0	3 0 0 0 0	0 0 0	2 2 2 0	14
Crawley	0 0 0	0 0 0 0	0 0 0	1 0 1 0 0 0 1 1 0 1	0 0 0 0 0	0 2 0 0 0	0 0 0	2 2 2 0	13
Micheldever Station	0 0 0	0 0 0 0	0 0 0	0 0 1 0 0 0 0 0 0 0	1 1 1 1 0	0 0 1 0 2	2 0 0	1 1 2 0	13
Bighton	0 0 0	0 0 0 0	0 0 0	0 0 1 0 0 0 0 0 0 0	0 0 0 0 0	0 0 1 0 0	0 2 2	2 2 2 0	12
Shawford	0 0 0	0 0 0 0	0 0 0	0 0 1 0 0 0 1 0 0 0	0 0 0 0 0	0 0 1 3 0	0 0 0	2 2 2 0	12
Old Alresford	0 0 0	0 0 0 0	0 0 0	0 0 0 1 0 0 0 0 0 1	0 0 1 1 0	0 0 1 0 0	0 2 2	1 1 2 0	12

Settlement Hierarchy Review 2021 13

- 2.6 In the period up to the November 2022 and the publication of the next Background Paper, the methodology changed, and Littleton was downgraded to the lowest tier with a score of 13 points, however, the Background Paper, and the 2024 update (Ref DS01) is silent as to why the methodology of recognising services and facilities beyond the settlement boundary was removed.
- 2.7 Given the minimal separation distances between Littleton and the City of Winchester, re-introducing the methodology of applying a linear **1.6km** distance on roads highlights the significant increase Tier 1 and Tier 2 Services and Facilities within the City boundaries in Weeke and Harestock:



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### Tier 1:

- A Primary School
- 2 Pre-School's (Harestock and Henry Beaufort)
- Convenience Store
- Children's Play
- Parks and Publicly Accessible Open Space
- Village Hall and 2 Pubs
- Fast Broadband
- Access to Employment

Sub-Total: 16

### Tier 2

- A Secondary School
- Friarsgate GP Practice
- Pharmacy
- Two major supermarkets
- Petrol Station
- Numerous independent shops and takeaways

Sub-Total: 6

**Total: 22**

2.8 The location of these services are shown within Figure 2 with a **score of 22** reflecting fully the proximity of the Village to the most sustainable location within the District and its two local centres in Weeke and Harestock, the latter of which is of course within the Parish of Littleton.



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**Figure 2: 1.6km travel distances to Services and Facilities from Settlement Boundary**



### West of Waterloo (Newlands)

- 2.9 As noted, the updated Settlement Hierarchy Papers post 2021 are silent on why the methodology removed the recognition of services and facilities within close proximity to the settlement boundaries.
- 2.10 However, such an approach is referenced in respect of the West of Waterloo/ Newlands development, and I would draw the Inspector's attention to Para 5.4 of the 2024 Settlement Hierarchy Review, where the LPA acknowledge that; ***'...the West of Waterloo development, is, as the name suggests, an urban extension of Waterloo, which is a large settlement with various facilities beyond but close to those located within the new development area itself'***. (Ref DS01, Para 5.4)
- 2.11 To amend the methodology to ignore the close proximity of services and facilities to Littleton, but at the same time acknowledge remote services and facilities to Newlands, would represent an inconsistent approach in the application of the methodology and cannot be considered a sound approach.



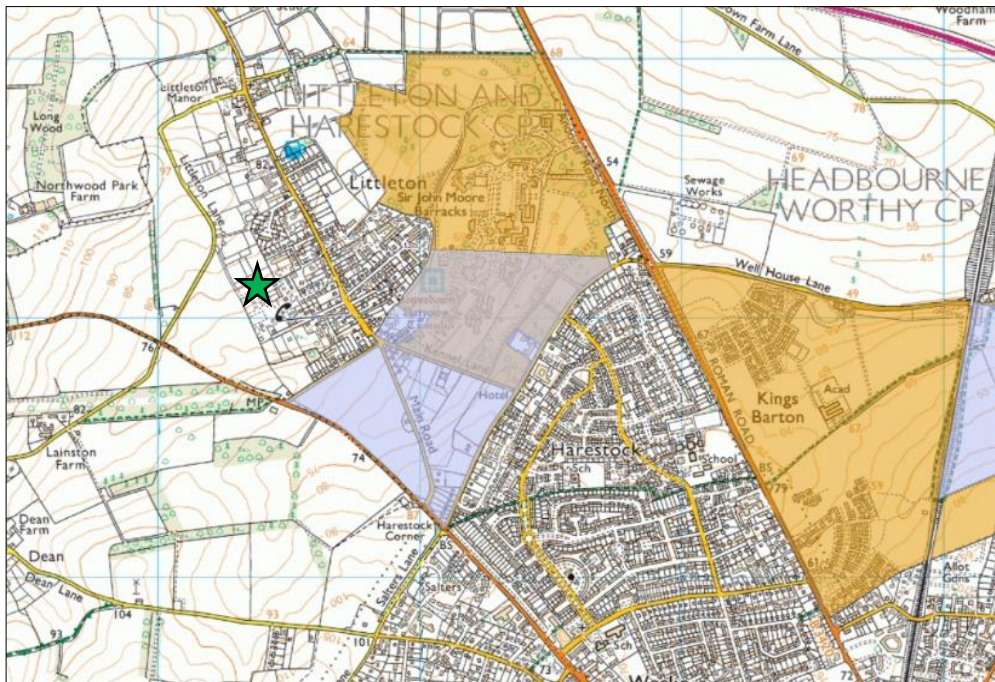


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### Sir John Moore Barracks

- 2.12 The merits of Littleton as a sustainable location within the Settlement Hierarchy is of course influenced significantly by the allocation of the Sir John Moore Barracks via **Policy W2** for large scale residential development for 750-1,000 dwellings at the Village. In doing so, the LPA are reliant upon services within Weeke and Harestock to serve the allocation, notably Primary and Secondary Education.
- 2.13 Para 12.14 of the Regulation 19 Draft Local Plan identifies the location of the Barracks as being ***'...located between the settlement of Littleton and built-up area of Winchester Town, and approximately half of the site is located in the Settlement Gap (Policy NE7)'***. (Ref SD01, Para 12.14, Regulation 19 Draft).
- 2.14 The latter part of this sentence is correct, with the southern portion of the land falling within the Local Gap as shown within Figure 3.

**Figure 3: Extract Local Plan Proposals Map**



*Blue shading Settlement Gap/ Orange Strategic allocations/ Green Star Littleton Nursery*







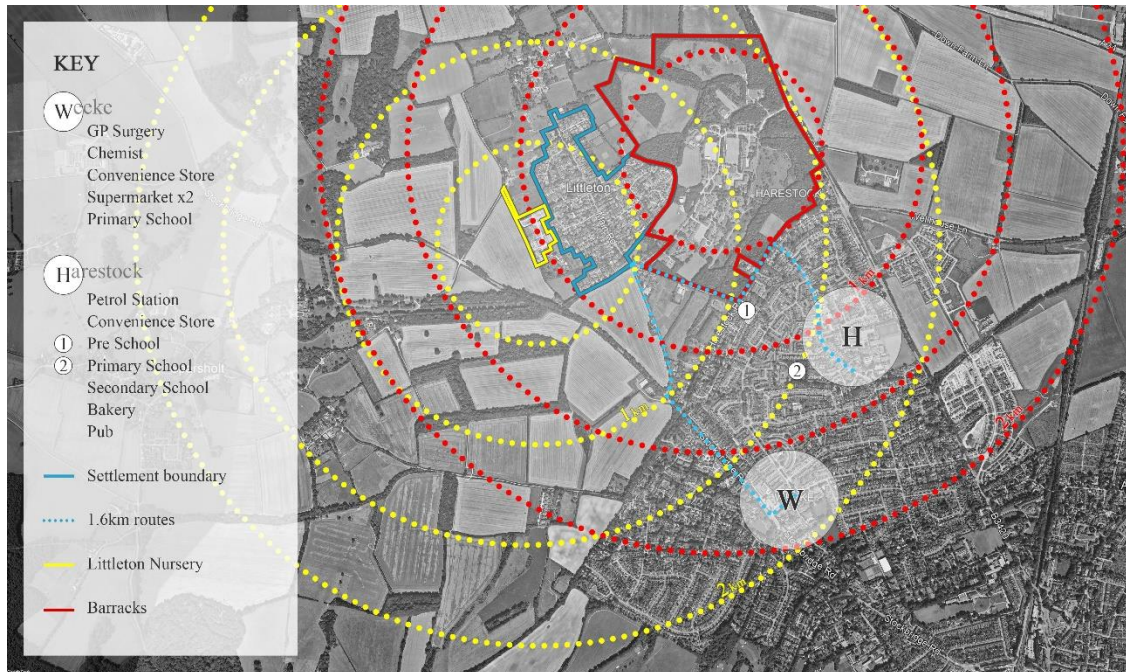
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- 2.18 In complete contrast, the brownfield site of Littleton Nursery is, in the view of the LPA and its conclusions of the Settlement Hierarchy, located on the edge of an 'Small Rural Settlement'.
- 2.19 While there is little detail at this time on what would be included in the Local Centre at the Barracks, there are a number of day to day services we can confidently say will not be within the development, namely Primary and Secondary Education given the lack of any facility planned for.
- 2.20 Any standalone development of 900 dwellings would require a Primary School, and as such, the LPA is acknowledging that in allocating the site, the Barracks is wholly reliant upon existing Primary Schools within the City to meet its needs and the functional link between Littleton and Winchester.
- 2.21 It should also not be lost that the Sir John Moore Barracks development is allocated to meet the City of Winchester's specific Housing requirement (Policy H1 – 'about 5,640'), further highlighting the view of the LPA of this functional link between Littleton and the City; if the Primary Schools within Weeke and Harestock can be deemed to support the Barracks, the question must be asked, why not the Littleton Nursery and the rest of the Village?
- 2.22 It is perverse of the LPA to come to such differing conclusions on two brownfield sites as it ignores entirely the evidence and geographical relationship between the two land parcels and the City, with the Barracks actually extending further from the City than the Nursery land. To assist the Inspector, Figure 5 provides a direct comparison between the two land parcels and the distances to the City and nearby services and facilities.



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**Figure 5: Comparison between the Littleton Nursery and Sir John Moore Barracks.**



- 2.23 For the purposes of this comparison, the central point of both the Nursery and the Barracks has been taken for the starting point of the concentric circles, which are drawn at 500m intervals. The Yellow Circles represent the Littleton Nursery, and the Red Circles the Sir John Moore Barracks. A summary of the services within the Local Centres is provided.
- 2.24 Far from being remote and unsustainable, the majority of Littleton, inclusive of the Nursery site, falls within 2km of all of the services within Weeke and Harestock, including the Schools, GP Surgery, Pharmacy, Supermarkets and facilities. This is very much comparable, and indeed better than many of the other Towns and Villages within the District that are deemed 'sustainable' by the LPA, and comparable to the Sir John Moore Barracks itself, which the LPA has deemed to be a sustainable location for large scale development.
- 2.25 Having made the representation to the Local Planning Authority at the Regulation 18 Stage, the Inspector will note the response as provided in italics:



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2.26 *The hierarchy focuses upon the services within each settlement, as that is more easily quantifiable in a way which can be summarised and inform the emerging development strategy. Sir John Moore Barracks is a major site which is being released from military use. It is important for the Local Plan to consider the future use of the site for this reason, not simply because it is brownfield site. It is logical that it should be treated as an extension of Winchester as it adjoins the Winchester built-up area, unlike Littleton Nursery. (Page 24/25, Response to ANON-KSAR-NKTJ-8 Policy H3 representations Regulation 18).*

2.27 The Inspector will be aware that the wording of Policy W2 requires the proposals for the Barracks to respect the 'Local Gap' between Littleton and Winchester, with the emerging Masterplan showing the housing set back from Harestock Road and limited to the existing built up area. As a development therefore, the future housing at the Barracks does not adjoin Winchester and is much more related to Littleton, to which it extends around the east and northeast of the Village.

2.28 It is agreed that the future use of the Sir John Moore Barracks should be considered as part of the Local Plan process, but that to be considered 'justified' when considered against the reasonable alternatives, the assessment of Littleton, and by extension the Littleton Nursery, should have been assessed on the same parameters, which it has not.

### Littleton v Sutton Scotney

2.29 Having identified the true level of accessible services and facilities available to Littleton and the inconsistency between the treatment of the Barracks and the rest of Littleton, it highlights the illogical approach of allocating 50-60 dwellings on a Greenfield Site at Brightlands, in favour of a 50 dwelling scheme on a brownfield site at Littleton.

2.30 To place this into some context, the LPA has allocated 50-60 dwellings on a Greenfield site located some 8km from the fringe of Winchester, with no supermarket, Primary or Secondary education facilities nearby and no hourly bus service, and yet we are told by the LPA that its conclusions of the Settlement Hierarchy process is that this Greenfield site represents a more



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sustainable form of development than a brownfield site within 2km of the aforementioned list of educational, medical, retail and supermarket facilities.

- 2.31 This one example alone demonstrates the failings of the Settlement Hierarchy Review and resulting site selection process and cannot represent the basis upon which the Plan can be found sound.



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3. Question 6: Would the Plan's spatial strategy strike the right balance between the need for development across brownfield and greenfield sites and any related impact on housing affordability?
  - 3.1. The representation now turns to the assessment of whether as a result of an inconsistent approach in the Settlement Hierarchy methodology, the right balance has been struck between the delivery of Brownfield and Greenfield sites in the context of the Local Planning Authorities stated position of a 'brownfield first' approach.
  - 3.2. Turning back to the wording of the Regulation 19 draft, Para 12.15 states in respect of the Sir John Moore Barracks that *'Part of the site comprises 'previously developed land' so it is important to make the full use of the site's potential, within the existing constraints'* (Ref SD01, Para 12.15, Reg 19 Draft).
  - 3.3. This is true, and yet the Littleton Nursery, which is 100% brownfield, has not benefited from this weighting and approach of seeking to make use of the site's potential. The LPA's rebuttal will be that brownfield sites in 'unsustainable' villages were not considered, however, as per this Hearing Statement, it has been shown that the LPA has erred in its assessment of Littleton as a sustainable location and is inconsistent given the identification of the Barracks.
  - 3.4. To provide some context of the Nursery, Figure 6 provides a series of pictures of the current B8 use. Further information is provided in the Regulation 19 representation respondent Ref BHLF-AQTS-326G-U and is not repeated here.





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**Figure 6: Photos of Littleton Nursery**



- 3.5. Within its Integrated Impact Assessment (IIA) Appendix F, the Council's evidence base concludes in respect of the Nursery that *'The majority of the site contains brownfield land. A significant proportion of the site ( $\geq 25\%$ ) is on Grade 3 agricultural land or less than 25% of the site is on Grade 1 or 2 agricultural land. Less than 25% of the site is within a Mineral Safeguarding Area'*. (Ref SD02c, Page 641.)
- 3.6. As can be seen from the photos and the aerial imagery at Figure 7, there is no agricultural land within the site, with the land being 100% previously developed. The land is also not within a Mineral Safeguarding Area. These errors in the LPA's evidence base were raised as part of the Regulation 18 representations, but unfortunately neither were acted upon.



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- 3.7. Instead, the response from the LPA stated that *'The IIA can be correct that the majority of the site is brownfield, but it may also contain some higher quality agricultural land regardless of its lawful use'*. It simply cannot be the case that a B8 Storage yard consisting of hardstanding and tarmac can be classed as being higher quality agricultural land. Alas, the error remains within the Council's evidence base and further undermines the Council's justification for its site selection approach.

**Figure 7: Aerial showing the Littleton Nursery and hardstanding**



- 3.8. The aerial imagery provides a ubiquitous illustration of the PDL nature of the former Nursery site, and moreover, the comparison with the Barracks in respect of the relationship of both to Littleton and the City of Winchester. How one can be judged sustainable and having a functional relationship with the City, while concluding the other is located within one of the least sustainable villages in the District, goes to the heart of the failing and why the Plan as drafted is unsound.



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### 4. Modifications required

- 4.1. Settlement Hierarchy Assessment and the resulting platform for the site selection process goes to the very heart of the soundness of any Local Plan with a failure to assess each opportunity accurately, and importantly, consistently, being the reason why the Plan fails the 'justified' test of soundness, given the alternatives that are available. This is even more pronounced when the 'alternative' is a brownfield site on the edge of a settlement within 2km of a wider range of Tier 1 and Tier 2 Services and Facilities.
- 4.2. In order to render the Plan sound, the Settlement Hierarchy should be revised and the true level of Services and Facilities available to Littleton allowed for, with the Village re classified as an Intermediate Rural Settlement in Policy H3. Such an approach would also provide consistency between assessment of the Sir John Moore Barracks and the Nursery.
- 4.3. Thereafter and adopting the Council's brownfield first policy, and applying the same parameters as applied to the Sir John Moore Barracks, would yield an allocation of the brownfield Littleton Nursery for 50 dwellings and a more sustainable location of development when compared to Land at Brightlands.

End.



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Appendix 1:

Settlement Hierarchy Review 2021 extract



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### 3. Ranking and Settlement Hierarchy

3.1 Table 2 below highlights the ranking of the settlements in accordance with the scores from Appendix A. As noted above, these scores are based purely on the presence of relevant services and facilities.

**Table 2: Settlement Hierarchy Groupings**

Category	Settlement
Town (score of over 50)	Winchester
Market Towns and Larger Villages (score of 30-50)	Bishop's Waltham, New Alresford, Denmead, Wickham, Waterlooville (Newlands), Whiteley, Colden Common, Kings Worthy, Waltham Chase
Other Settlements in the Market Towns and Rural Area (with settlement boundaries) (score of below 30)	South Wonston, Swanmore, Sparsholt, Otterbourne, Sutton Scotney, Southwick, Micheldever, Micheldever Station, Old Alresford, Compton Down, Knowle, Littleton, Curdridge, Hursley, Southdown
Other Settlements in the Market Towns and Rural Area (without settlement boundaries) (score of below 30)	Durley Street, North Boarhunt, Woodmancott, Curbridge, Northbrook, Northington, Stoke Charity, Wonston, Swarraton, Hundred Acres, Shedfield, Bishops Sutton, Compton Street, Durley, Newtown, Headbourne Worthy, Otterbourne Hill, Crawley, Bighton, Shawford, Shirrell Heath, Gundleton, East Stratton, Soberton Heath

3.2 It is intended that the cut off points in the current LPP1 settlement hierarchy remain until the outcomes of the consultation responses on the Strategic Issues and Priorities (SIP) document have been received. If it is decided to promote a new spatial strategy in the emerging Local Plan then it may become appropriate to review the cut off points for each of the groupings above, with the possibility of moving some settlements into a higher or lower grouping of the hierarchy and possibly allocating settlement boundaries to some of the settlements which don't have them currently. Whatever the outcome of the SIP consultation it is important to have an updated hierarchy in order to maximise sustainable development opportunities.