

**WINCHESTER DISTRICT  
LOCAL PLAN PART 2**

**DEVELOPMENT MANAGEMENT  
& SITE ALLOCATIONS**

**HEARING STATEMENT  
(MATTER 14)**

Prepared on behalf of:  
The Hospital of St Cross & Almshouse of Noble Poverty  
Unique Reference Number: 51467

June 2016



## 1.0 Introduction

- 1.1 This statement has been prepared by Pro Vision Planning & Design on behalf of The Hospital of St Cross and Almshouse of Noble Poverty ("The Charity"), specifically in relation to their land on the edge of Winchester Town and the current review of the existing settlement policy boundary.
- 1.6 The representations relate to Matter 14 and specifically the following Inspector's questions, which state:
- i. **Are the policies and proposals for growth and change in this area appropriate and justified, including in relation to the NPPF/PPG, and in terms of environmental, economic and social impacts?**
  - ii. **Are they clear and deliverable, including in respect of the associated infrastructure requirements?**
- 1.7 Land owned by the Charity on the edge of Winchester (at St Cross) is previously developed land on which the NPPF seeks to prioritise development. It is in a highly sustainable location, well related to existing facilities and services in the surrounding urban area.
- 1.8 Local Plan Part 2 ("LPP2") proposes a review of existing settlement boundaries. This exercise is supported by the 2014 Settlement Boundary Review (SBR) (updated 2015). In reviewing the criteria set out in the SBR it follows that the settlement boundary for Winchester Town should be amended to include the previously developed land at St Cross as shown on the attached plan.

## 2.0 The Charity

- 2.1 The Hospital of St Cross and Almshouse of Noble Poverty was founded in 1136 by the grandson of William the Conqueror, Henry de Blois. It is the oldest charitable institution in the country and occupies a particularly fine group of medieval buildings.
- 2.2 Not only is it the oldest but is also the largest medieval almshouse in Britain; it is built on the scale of an Oxford or Cambridge college, but is older than any of the colleges at the universities. It has been described as England's oldest and most perfect almshouse.
- 2.3 The Charity provides sheltered accommodation and self-contained quarters for up to 25 'brothers'. The scheme of administration which governs the Hospital provides that brothers must be over 60 years old, no longer in employment and preference should be given to those on low or limited income.
- 2.4 The Trustees of the Charity are justly proud of the longevity and continuity of the Charity's work despite limited financial resources and the onerous maintenance liability of the 12th Century Chapel of St Cross (which acts as the Parish Church of St Faith) and 15th Century Almshouses. Nevertheless, they continue to be responsible stewards of a nationally important Grade 1 listed building and in seeking to include

land at St Cross within the defined settlement boundary, are equally bound to 'do the right thing' by the designated heritage asset.

### **3.0 Site Description**

3.1 The land off St Cross Road is previously developed land, comprising existing built form and hard surfaces. Land to the south of the site is parkland and sports grounds interspersed with isolated pockets of development. The urban framework and settlement boundary continues for 1km on the western side of St Cross Road to the south of the Charity land. There is continuous built form along St Cross Road to the north of, and including, the site. As such the site is clearly part of the urban framework. Further, the site is separated from open countryside to the south by an established belt of mature trees creating a logical and definable boundary.

### **3.0 Settlement Boundary Review**

3.1 Proposals for growth and change in this area are not justified on the grounds that that they do not promote the most appropriate strategy.

3.2 The landowner has made comments at previous stages of LPP2 consultation. These comments suggested a logical amendment to the existing settlement boundary for Winchester Town to include land off St Cross Road. Alterations to the settlement boundary at this location is consistent with the NPPF and the relevant criteria in the 2014 SBR. The LPP2 as currently drafted does propose alterations to the settlement boundary for Winchester Town, although land at St Cross is currently omitted.

3.3 Paragraph 3 of the 2014 SBR defines a settlement boundary as follows:

*"a settlement boundary marks the limits of towns and villages, being the dividing line between built up/urban areas (the settlement) and the non-urban or rural areas (the countryside), to define where planning policies apply."*

3.4 The 2014 SBR states the following purposes of settlement boundaries:

*1. Creating an edge to existing development thereby encouraging consolidation*

The Charity's proposed alterations to the settlement boundary at St Cross will provide a more logical and definable edge to the urban area.

*2. Helping to separate communities and therefore retain their individual identities*

The suggested alterations to the settlement boundary at St Cross will not have any adverse impact on the purpose or function of any defined gap between settlements. As currently drafted the LPP2 settlement boundary at St Cross performs no function of separating communities.

*3. Defining the logical boundary between areas with different features and purposes, e.g. between areas with environmental or landscape designations and those suitable for development*

The settlement boundary as currently drafted represents an arbitrary boundary and fails to reflect a logical boundary between areas with different features and purposes.

- 3.5 The 2014 SBR suggests that a boundary review at Winchester is not necessary because the housing requirement can be met by existing consents within the settlement boundary and by strategic housing allocations on the edge of the Town. This contradicts paragraph 13 of the 2014 SBR which is clear in stating that a settlement boundary review is required where the requirement cannot be met within the existing boundaries. In doing so **the SBR advises that previously developed land should be prioritised**. The land at St Cross is previously developed land.
- 3.6 Paragraph 20 of the 2014 SBR agrees that "*smaller sites could be released through a review of settlement boundaries*". In addition, it states that "*where there are any obvious and suitable candidates boundaries could be adjusted to accommodate them and provide a degree of flexibility within the housing supply*".
- 3.7 Paragraph 26 of the 2014 SBR highlights that some buildings on the edge of settlements have a clear social or economic function and may relate more closely with the local community than the local countryside. Further, the Charity land does not comprise playing fields or open space which would normally be protected from development by countryside policies.
- 3.8 Further, the Council's position that the need for a settlement boundary review is obviated by the proposed delivery and distribution of new housing on allocated and consented sites around the Town over the plan period is also inconsistent with the NPPF and the 2014 SBR definition of the purpose of a settlement boundary (paragraph 5).
- 3.9 The Charity owned land at St Cross is undeniably in a sustainable location. The presumption in favour of sustainable development is the golden thread that runs through the NPPF, not just in the context of Paragraph 14. In essence this is a significant material consideration to be weighed against the current position of the settlement boundary, and is a compelling reason to include land in a sustainable location, and which meets the SBR criteria, within any review of the settlement boundary. The NPPF also reminds us that local planning authorities are required to 'boost significantly' the supply of housing.
- 3.10 The LPP2 as drafted seeks to restrict development outside the defined settlement boundary for Winchester in order to preserve the 'special character of the Town'. It appears as though land at St Cross Road is omitted from the settlement in order to preserve the setting of this part of the conservation area and listed buildings in the local area. However, the settlement boundary is not the appropriate tool to achieve this. There are heritage specific policies in the LPP1 and draft LPP2 which consider development in these sensitive locations. Small sites on the edge of settlements will not have any significant adverse impact on the character of the Town. Hence, settlement boundaries should be extended in sustainable locations to facilitate organic growth and relieve pressure on urban areas to develop at higher densities,

which will make a more meaningful contribution towards preserving the special character of the wider Town.

## 4.0 Summary

- 4.1 The local planning authority has taken account of a number of principles in carrying out the settlement boundary review.

**Principle 1** – suggests that boundaries should have a degree of permanence to avoid change over time. The precinct wall for the Hospital of St Cross is of solid construction and is listed. It is therefore a permanent structure that is protected. There is also a group of protected mature trees which serve as a natural gateway to the urban framework.

**Principle 2** – states that small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing urban area will be included. It goes on to state that curtilages that are contained, are visually part of the urban area and are separated from the open countryside will also be included. The Charity land at St Cross clearly meets these criteria.

**Principle 3** – states that loose-knit buildings on the edge of settlements should not be included. It goes on to exclude outlying or isolated development which is physically or visually detached from the settlement. In addition, it is suggested that where a settlement is fragmented the open gaps between developed areas should be retained. The Charity land and buildings at St Cross form part of the existing urban framework and cannot be regarded as loose knit, outlying, isolated, or physically or visually detached from the settlement. Similarly, the settlement is not fragmented at this point and alteration to the settlement boundary will not harm important gaps.

- 4.2 The 2014 SBR applies these principles to a review of all settlements in the District. However, at Winchester Town – the largest and most sustainable settlement – only 3 alterations are considered. An extension of the settlement boundary is proposed to include the now developed Reserve housing sites at Francis Gardens and Pitt Manor. In addition, the Council-owned Leisure Centre was considered for inclusion but was excluded because policy exceptions allow essential facilities to be provided in this countryside location. Ultimately this does not represent a comprehensive review of the opportunities for growth or a thorough appraisal of all suggested alterations to the settlement boundary at Winchester.
- 4.3 Paragraph 32 of the 2014 SBR states that "*principles therefore need to be applied consistently when defining settlement boundaries and where judgments are made, these need to be explained*". It is not clear how the above principles have been applied or justified at St Cross.
- 4.4 Accordingly the current proposed amendments to the settlement boundary of Winchester are not justified. The proposed settlement boundary of Winchester should be amended to include the previously developed land off the St Cross Road.

