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# Winchester Local Plan Reg.19 Consultation

Land North of Anmore Road, Denmead

CLIENT: PERSIMMON (SOUTH COAST)

October 2024  
DHA/34089

## Kent

01622 776226

## Gatwick

01293 221320

## London

020 3005 9725

Email: [info@dhaplanning.co.uk](mailto:info@dhaplanning.co.uk)

Web: [www.dhaplanning.co.uk](http://www.dhaplanning.co.uk)

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# 1 INTRODUCTION

- 1.1.1 DHA has been instructed to submit representations to the Winchester Local Plan 2020-40 Regulation 19 Consultation on behalf of our client, Persimmon South Coast ('Persimmon'). Persimmon is under contract with the Landowner to promote the site to the North of Anmore Road, Denmead, on its behalf.
- 1.1.2 We consider this Site should be allocated within the Local Plan for residential development. It can provide around 300 residential dwellings, potentially as part of a phased site delivery, that would include both market and affordable homes, and land and/or contributions for new community provision.
- 1.1.3 This Site was submitted to Winchester City Council ('WCC') as part of its 'Call for Sites' exercise that took place in 2021. The 'Call for Sites' submission highlighted the site's sustainability credentials, with an opportunity to deliver residential development. Persimmon has also submitted representations promoting this Site during both during the Strategic Issues and Priorities Consultation (April 2021) and Regulation 18 Consultation (December 2022).
- 1.1.4 The Site has been considered as part of the Strategic Housing Land Availability Assessment (SHLAA) which accompanies this consultation (Site DE11). The Council recognises this site is deliverable and developable, and confirms the site is free from any overarching technical constraints; something which is rare when delivering strategic residential sites.
- 1.1.5 The site lies immediately to the north of Denmead's existing settlement boundary. Denmead is defined as a "Larger Rural Settlement" within the emerging Local Plan, which is a Tier 3 settlement sitting only below Winchester as the principal town and the market towns of Bishops Waltham and New Alresford. Accordingly, it represents a sustainable option to accommodate growth.
- 1.1.6 The Local Plan makes provision for 328 dwellings to be provided in Denmead across the Plan period (2020-40), of which 228 have either been completed or are existing Denmead Neighbourhood Plan allocations. Denmead Parish Council has committed to undertaking a Review of its adopted Neighbourhood Plan and will look to identify sites through this process for the residual 100 dwellings. For reasons set out in this Representation we consider this figure is too low and Denmead should seek to accommodate further units over the Plan period. Accordingly, the strategy within the Local Plan is unsound.

## 2 BACKGROUND CONTEXT

### 2.1 THE SITE

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- 2.1.1 The Site promoted by Persimmon comprises circa. 15.89 ha of land to the north of Anmore Road (Site DE11).
- 2.1.2 The site is located to the north-east of Denmead, in the southern area of Winchester District. It comprises 15.89 hectares of undeveloped agricultural land and is adjacent to the recently completed site at Kidmore Lane for 91 dwellings built by Persimmon (Charles Church), to the west of the site.
- 2.1.3 The southern boundary adjoins existing residential dwellings along Anmore Road, and the eastern boundary is delineated by White Horse Lane. To the north is countryside.
- 2.1.4 The site adjoins the settlement boundary of Denmead to its southern and western edges.
- 2.1.5 Within walking distance from the site are a range of shops, restaurants, GP Surgery, Denmead Infants and Junior schools, football, tennis and bowling club, parks and open space. There are also bus stops which provide services to Waterlooville..
- 2.1.6 Land immediately to the west of the Site is a recently completed residential development by Charles Church at Kidmore Lane. It comprises agricultural land which as set out in the Call for Sites submission is of low ecological value.



FIGURE 2.1: SITE LOCATION

## 2.2 PERSIMMON SOUTH COAST

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- 2.2.1 Persimmon Homes is one of the UK's most successful housebuilders, committed to the highest standards of design, construction and service. With its headquarters in York, the Group is made up of a network of 29 regional operating businesses to allow national coverage. Persimmon has a proven record of being able to deliver dwellings in a timely manner to meet the needs of planning policy.
- 2.2.2 Persimmon South Coast is promoting the site Land north of Anmore Road (SHELAA Site DE11) for residential purposes. Persimmon has contracted with the landowner to promote this Site on their behalf. Persimmon has successfully worked with WCC and Denmead Parish Council to deliver the adjoining Kidmore Farm site, which has now been completed and is an attractive addition to the village that provided a substantial new ecology area and greenspace to the north of Tanner's Lane.

## 2.3 DEVELOPMENT POTENTIAL

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- 2.3.1 As detailed in the Call for Sites, Persimmon is promoting a sustainable, residential led housing development on the site which can be delivered in the short term (i.e.

within the next five years). There is also an opportunity to provide a community facility, such as a new village hall or contributions towards a scout hut along with substantial new public open space provision.

- 2.3.2 A number of technical assessments have been carried out including into matters such as access, ecology, tree survey and drainage. These reports demonstrate that technical solutions to these matters can be designed into the scheme and there are no technical constraints which prevent development of the site. Further, this work has identified the opportunities and constraints which have informed the concept masterplan for the site. These reports have been provided to the Council previously and are therefore not included as part of this Consultation Response.
- 2.3.3 The accompanying Vision Document prepared by SLR allows for a phased delivery of the site, with c. 100 units coming forward in three district phases. This can facilitate delivery of housing in a coordinated manner across a longer-term plan period if required.
- 2.3.4 Access is anticipated via the adjoining new development at Kidmore Lane to the west. Emergency, pedestrian and cycle access points could also be provided towards the north-east and south-east corners of the site should this be required. The site's location close to Hambledon Road also means that vehicle journeys to the main road network can be made without the need to drive through the lower order roads within the village.
- 2.3.5 Milestone Transport Planning has reviewed the trip data to conclude that the surrounding highway network is capable of supporting this proposed development.
- 2.3.6 The majority of the roads surrounding the site are suitable for safe cycling. In addition, the site is ideally placed in terms of accessibility by foot to a wide range of local amenities, including the following which are all within 800m (10 minutes walk) on Hambledon Road:
- Bus stops
  - Denmead Infant School
  - Denmead War Memorial Hall
  - Co-Op and Post Office
  - Denmead Medical Centre
  - Boots Pharmacy
  - The Parish of All Saints Church
  - Lloyds Bank
  - The Forest of Bere Public House

## 2.4 CURRENT HOUSING LAND SUPPLY AND DELIVERY POSITION

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- 2.4.1 Winchester District's housing need for the plan period 2020-40 is 13,565 dwellings in line with the Standard Method calculation of Annual Need (Local Plan Table H1).
- 2.4.2 This consultation Plan is seeking to meet this housing need in full. Recognising that a number of authorities in the southern Hampshire region appear unable to meet their Standard Method housing need in full, in the "spirit of cooperation required by government policy", WCC is looking to provide an additional unmet needs allocation of 1,900 dwellings.
- 2.4.3 This provides a total District Housing Requirement of 15,465 dwellings. This includes an estimated 350 dwellings within the South Downs National Park.
- 2.4.4 The remaining requirement for the Local Plan area (excluding the estimated 350 in the South Downs National Park part of the district), including the allowance for unmet need from neighbouring authorities, is 15,115 dwellings. Some 64% of the district requirement is met by dwellings that have either been completed or which already have planning permission. A further 12% are expected from windfall development over the Plan period. Less than 25% of provision is from Local Plan allocations (either carried forward or new). In WCC's view this gives a high level of certainty to delivery.
- 2.4.5 The Council has therefore not included a buffer to allow for non-delivery, especially given, in its view, the high levels of housing provision expected in the early years of the Plan period. It considers any shortfall in housing delivery can be made up through adjustments to phasing provisions at the Plan is updated/reviewed every 5 years.
- 2.4.6 We note the Council's current stated housing land supply position is over 7 years (AMR, 2022-23); with substantially more than 5 years' supply for both the 2023-2028 and 2024-2029 monitoring periods. Eastleigh, an adjoining authority to the west (and one with a direct relationship to the Site at Botley Railway Station) has a stated housing supply of 5.1 years (August 2022).
- 2.4.7 It is noted that the Government is proposing changes to the Standard Method in its revised NPPF, and if this comes into force, Winchester's annual housing need will increase by 62% from 676 to 1,099 dwellings per annum. Given the current plan is more than 200 dwellings per annum under this threshold, if WCC has not submitted its Plan to the Secretary of State for examination ahead of the publication of the NPPF it will need to produce a replacement Reg. 19 Local Plan to accord with the new policies in the Framework and the new Standard Method before proceeding.
- 2.4.8 Even if WCC submits its Plan by this deadline, it will be required to commit to a Review of the Plan at the "earliest opportunity".

## 2.5 PROPOSED SPATIAL STRATEGY

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- 2.5.1 The Council's spatial strategy, as set out through Strategic Policy SP2, is to direct housing growth to the three spatial areas: Winchester Town (5,640 dwelling); South Hampshire Urban Areas (5,650); and the Market Towns and Rural Area (3,850).
- 2.5.2 This approach follows the Spatial Strategy as set out in the Winchester District Local Plan Part 1. The adopted Local Plan Part 1 covers the Plan period up to 2031, and makes provision for the development needed, and the IIA notes that much of the development needed by the District for the new Local Plan period (2040) is already planned.
- 2.5.3 A significant proportion of the District's housing need is being provided through three ongoing strategic allocations: Newlands (west of Waterlooville), North Whiteley and North of Winchester (Kings Barton) – with a combined capacity to deliver over 5,000 homes.
- 2.5.4 In addition, as identified in the Local Plan Part 2, there are various smaller allocations which also need to come forward for development and have been included in this Reg. 19 Local Plan strategy.
- 2.5.5 This "committed" development (homes built, permitted or allocated since 2018) amounts to around 11,300 dwellings and makes up a substantial part of the new Local Plan's housing requirement.
- 2.5.6 Given the large quantum of committed development, the Spatial Strategy for the Local Plan Part 1 has been used as the starting point for the consideration of a Spatial Strategy through the IIA for the New Local Plan (Option 2). Other options include:
- Focus development on Winchester itself and other larger and more sustainable settlements (Option 2)
  - New Strategic allocations or new settlements (Option 3)
  - Disperse development around the District largely in proportion to the size of existing settlements (Option 4).
- 2.5.7 The Council also subsequently looked at an additional option which saw a reduced housing target for the South Hampshire Urban Areas and increased growth at Winchester Town and the Market Towns and Rural Areas (Option 1A).
- 2.5.8 In terms of housing assigned to Market Towns and Rural Areas in the considerations of the options, Options 1, 2 and 3 are broadly comparable in terms of the number of homes considered for this area i.e. around 2,700-2,800. Option 4, dispersed development strategy allows for around 4,000 homes, which proportionally reflects their existing size and commitments.



## 2.6 DENMEAD NEIGHBOURHOOD PLAN

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- 2.6.1 The made Denmead Neighbourhood Plan (April 2015) sets out the community's vision for development in Denmead and includes a number of housing allocations (and other land use policies) to deliver the 250 dwellings identified in the adopted WCC Local Plan Part 1.
- 2.6.2 Denmead Parish Council is currently reviewing the made Neighbourhood Plan and is looking to allocate site(s) for a further 100 dwellings, in line with WCC's emerging Local Plan. The Parish Council has put forward three site options for consultation, including the south-western part of Land North of Anmore Road, which is known as 'option 2' (DE11).
- 2.6.3 These site options are now being consulted on with local residents and public exhibitions are being held on 11<sup>th</sup>, 12<sup>th</sup> and 25<sup>th</sup> October. Following this the Neighbourhood Plan will be finalised, inspected and a referendum arranged for the village to vote on adoption of the plan.

## 2.7 PARTNERSHIP FOR SOUTH HAMPSHIRE

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- 2.7.1 The Partnership for South Hampshire (PfSH) was originally formed in 2003; it is a partnership of district and unitary authorities, together with Hampshire County Council and the South Downs National Park Authority, working together to support the sustainable growth of the South Hampshire sub-region. WCC falls partly within the PfSH boundary.
- 2.7.2 It is prudent to note that the new Government is placing more of an emphasis on regional planning in terms of authorities working together to plan for the needs of a region, with the Duty to Cooperate remaining a legal consideration in the preparation of Local Plans, despite the former Government indicating this would be abolished. The Labour Government has reinforced its messaging that authorities should be working together to meet the needs of a region. In her letter dated 30th July 2024 to all Local Authority leaders, Angela Rayner confirmed that:

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*"First, in addition to the continued operation of the duty to cooperate in the current system, we are strengthening the position in the NPPF on cooperation between authorities, in order to ensure that the right engagement is occurring on the sharing of unmet housing need and other strategic issues where plans are being progressed in the short-term".*

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- 2.7.3 The continued work of the PfSH is therefore supported and welcomed, to advocate and facilitate cross boundary planning.

- 2.7.4 A previous assessment of housing need within the PfSH area established an overall level of need to 2036 of approximately 85,000 homes (PfSH Statement of Common Ground Update 2022). This was based on the standard method of calculating housing need and contains a 35% uplift applied by the Government to the twenty largest cities in England including Southampton. In line with emerging national policy, the Spatial Position Statement will not seek to apportion any unmet need from this uplift to neighbouring areas. The specific housing requirements for each PfSH local authority will be determined in the individual Local Plans with the appropriate housing figures and locations for development tested in local plan examinations.
- 2.7.5 As set out in the signed Statement of Common Ground between WCC and PfSH there is a current shortfall of around 14,500 homes being provided across the South Hampshire area (Table 1). This figure excludes the 35% uplift which was being proposed to the main urban area which would have applied to Southampton.
- 2.7.6 Whilst this figure will continue to fluctuate, it is clear there is a very significant shortfall across the area and a need for the authorities to continue to work together to assist in meeting unmet need. Whilst only part of Winchester district is located within the PfSH area it is noted that this area does include Denmead.
- 2.7.7 The SoCG recognises that Winchester, along with Fareham, are looking to accommodate some of this additional need (making provision of some 2,350 homes). As noted above, it is our view there are suitable and deliverable sites within Winchester District, including the Land at north of Anmore Road, Denmead promoted by Persimmon, that could contribute even further in meeting the unmet needs of the South Hampshire area.

## 3 REPRESENTATIONS

### 3.1 POLICY SP2: SPATIAL STRATEGY AND DEVELOPMENT PRINCIPLES

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#### Meeting Housing Needs

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- 3.1.1 Paragraph 11b of the NPPF makes it clear that strategic policies should plan to meet objectively assessed needs unless other policies in the Framework provide a strong reason for restricting development, or any adverse impacts would significantly and demonstrably outweigh the benefits.
- 3.1.2 The Local Plan's housing need figure is currently 15,465 up to 2040; this includes the needs of the District and an unmet needs allowance of 1,900 as a contribution towards the unmet needs of neighbouring areas in South Hampshire.
- 3.1.3 We are pleased to see the Council is looking to meet the development needs over the Plan period in this Local Plan consultation (identified in Policy H1), and look to take a proportion of the unmet needs figure within South Hampshire. However, there are opportunities for WCC to deliver more housing through this Plan, and it is disappointing to see the Council not planning more proactively to take more of this unmet need. This is particularly the case given that WCC's need is very likely going to increase by 62% through the proposed changes to the standard method proposed to come into force through the Government's changes to the NPPF.
- 3.1.4 It is considered more can be done in this regard. There are available sites which are suitable for development, such as the land north of Anmore Road, Denmead (Site DE11), which could come forward for development. The language used within the Plan i.e. "in the spirit of cooperation" indicates that the Council has explored to the full extent additional housing it could accommodate.
- 3.1.5 As noted in the Integrated Impact Assessment (IIA), Winchester's house prices are significantly less affordable than the average for England and Wales, reflecting the high number of residents who commute to London for work. Rental prices in the District are the most expensive outside London. High house sale and rental prices will make it increasingly difficult for younger people and people with lower incomes to enter the property market and continue the trend for workers in lower paid jobs in Winchester City commuting in from Southampton, Eastleigh, Fareham and other settlements to the south of the District.
- 3.1.6 We agree with the conclusions made in the IIA that a focus on meeting local housing need is critical in the delivery of affordable housing, supporting communities health and wellbeing, strategic infrastructure delivery and the local economy. If the District is looking to increase affordability it is important that it delivers its own development needs. Indeed, whilst potentially covered by the transitional arrangements it would be sensible for WCC to seek to achieve figures closer to those stemming from the new Standard Method to achieve this goal.

## **Spatial Strategy**

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- 3.1.7 Whilst supportive of the fact the council is seeking to meet its need as a minimum, we have some concerns regarding the approach to the spatial strategy as outlined below.

### ***1. Consideration of Spatial Options***

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- 3.1.8 The Council recognises in the consideration of its Spatial Strategy, and its focus on Option 1, that whilst housing is predominantly focused towards Winchester Town and the South Hampshire Urban Area that if housing cannot be delivered at the existing strategic allocations it is likely the southern part of the district would need to meet the remaining housing need (IIA, Para. 4.9).
- 3.1.9 In this context, we encourage the Council to consider any other reasonable options to identify additional sites in sustainable locations within the Market Towns and Rural Area, such as the land north of Anmore Road, Denmead. Denmead is a Tier 3 settlement, and accordingly is a sustainable option for growth and its allocation would further boost the supply of housing. The need to ensure a robust and consistent supply of housing should be given particular weight in the decision making process when identifying the spatial strategy of the Plan.
- 3.1.10 Reliance on large scale, strategic allocations are risky given their delivery can often stagnate due to wider market factors and associated requirement to deliver significant infrastructure; as summarised in further in the sub-section below. In any case, these large allocations need to be supplemented by significant supply of small and medium scale sites which can be delivered in the short and medium term, to ensure a sufficient supply in the early years of the Plan.
- 3.1.11 We encourage the Council to identify any other reasonable additional sites that could be allocated to boost the supply of housing and focus on delivering the housing required, based on the Standard Methodology, to meet Winchester Districts', and the wider South Hampshire's needs. This can be achieved by directing greater growth to the more sustainable locations in the district, including Denmead. The need to ensure a robust and consistent supply of housing should be given particular weight in the decision making process when identifying the strategy. Focus on other sustainable sites should be given further attention.

### ***2. Strategic Housing Delivery***

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- 3.1.12 There are three strategic sites being delivered within the District, and the Council is relying heavily on their continued delivery to meet the district's housing need as part of the New Local Plan. These sites are Waterlooville, North Whiteley and Barton Farm.
- 3.1.13 The assumed delivery of this allocations moving forward as set out in the WCC's Annual Monitoring Report (AMR) 2022-23 is shown in the table below:

Address	Status / Commentary	Net Available	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	Unlikely by 2031	Total Supply
<b>Strategic Allocations</b>												
Grainger Site, West of Waterlooville,	Part of LPP1 policy SH2 allocation. 4 phases currently under construction and 3-6 phases expected to be under construction in each of the next 5 years. Phasing estimated accordingly.	1206	120	120	120	120	120	120	120	120	246	1206
North Whiteley	LPP1 policy SH3 allocation. Outline consent granted July 2018 4 phases complete, 14 phases under construction, and reserved matters approved for 5 further phases. Phasing estimated accordingly.	2525	372	320	300	300	250	250	225	175	333	2525
Barton Farm, Andover Road, Winchester	LPP1 policy WT1 allocation. Phase 1b complete, Phase 1a under construction. Reserved matters applications for Phases 2-4 under consideration. Phasing estimated accordingly.	1541	115	115	115	115	115	115	115	115	621	1541
<b>Strategic Allocations TOTAL</b>		<b>5272</b>	<b>607</b>	<b>555</b>	<b>535</b>	<b>535</b>	<b>485</b>	<b>485</b>	<b>460</b>	<b>410</b>	<b>1200</b>	<b>5272</b>
<b>TOTAL Large Sites Supply</b>		<b>7,034</b>	<b>869</b>	<b>750</b>	<b>699</b>	<b>683</b>	<b>663</b>	<b>745</b>	<b>713</b>	<b>582</b>	<b>1,330</b>	<b>7,034</b>

- 3.1.14 WCC’s Annual Monitoring Report (AMR) 2022-23 confirms (para. 3.1.46) that completions across the three strategic sites are now reaching their peak. It is noted that market conditions resulted in lower levels of provision in the first part of the Local Plan period, but the trajectory was updated in the Local Plan Part 2 to provide a more realistic basis for future monitoring.
- 3.1.15 The AMR indicates that in 2022/23 74 dwellings were completed at Bartons Farm, 348 dwellings at North Whiteley. It is accepted that once strategic sites begin mobilisation they can deliver more quickly so the above assumptions on the face of it are not unreasonable. Saying that, anticipating a steady trajectory as proposed is misguided as global and national matters can disrupt housing provision as we have seen with the Covid 19 Pandemic, rising interest rates, rising construction costs etc. The fact the Council is relying on this growth we would suggest that more conservative delivery rates are applied; particularly as the rates anticipated have not yet been achieved.

### 3. Growth at Denmead

- 3.1.16 We support and welcome that Denmead Parish Council has progressed a Neighbourhood Plan which seeks to accommodate and facilitate growth in the Parish; particularly as it is looking to review this to accommodate further growth. However, the relationship between both this emerging Local Plan and the Denmead Neighbourhood Plan review is muddled; and as such there is a risk

neither will be effective shortly after adoption and certainly not over the life of this Plan period.

- 3.1.17 It is noted that the Local Plan seeks to direct a small level of additional growth (just 100 dwellings) to Denmead and leave it to the Parish Council through the Neighbourhood Plan Review process to identify suitable sites to accommodate this.
- 3.1.18 Firstly, given the high level of unmet need as noted in subsection 1) above, we consider further growth should be directed to Denmead, particularly given the options available to accommodate in excess of an additional 100 dwellings as part of this Local Plan review. For example, the site promoted by Persimmon to the north of Anmore Road can accommodate 300 dwellings alone; and there are additional sites being promoted around the village.
- 3.1.19 Denmead is a Tier 3 settlement in the sustainability hierarchy and accordingly, to maintain its role in sustainability terms additional growth can be facilitated.
- 3.1.20 Whilst we do not object to the principle of the Local Plan deferring responsibility to the Neighbourhood Plan process for growth, more could be done to facilitate this. Primarily, we note the Local Plan is not looking to extend the settlement boundary of Denmead which we think is not justified. It is clear that this will need to be extended to facilitate growth and for clarity this should be done at Local Plan stage. This will ensure growth can come forward over the Plan period and will ensure both the Neighbourhood Plan review and the Local Plan are aligned. This will make the policy context much clearer, and therefore far more effective moving forward.
- 3.1.21 We would suggest the boundary is extended to include our client's site which is one of the three options currently under review by the Parish Council. This would demonstrate positive plan making, is justified by the SHELAA conclusions and will ensure the Neighbourhood Plan can be delivered in line with the Strategic Policies in the Plan. Some further joined up thinking between the District and Parish councils is required to ensure both Plans can be read alongside each other, and one does not become immediately redundant upon adoption.

#### **4. Phasing**

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- 3.1.22 Policy H2 'Housing Phasing and Supply' sets out that phasing will be applied to new greenfield housing sites allocated by this Plan, as to prioritise the development of previously development land and achieve a sustainable housing trajectory; holding back most allocated greenfield sites until the later parts of the Plan period (2030 and beyond unless the Council's has a housing land supply shortfall). This includes greenfield sites in Denmead.
- 3.1.23 This approach is wholly unjustified and not in line with the policy guidance for plan making in the NPPF. Indeed, with the additional housing expectations arising from the proposed changes to the Standard Method reflecting the level of need in the

District we would expect this approach to be removed in the version of the Plan to be submitted for examination.

- 3.1.24 Whilst we recognise that LPAs should make effective use of land when preparing plans, plans should also ensure that housing needs are met in full and a phased approach provides a far too rigid framework for to deliver growth. Like Strategic Sites, brownfield sites are often more difficult to get moving, and more likely subject to delays and additional cost pressures due to land remediation, access for construction and so on. The Council should be encouraging greenfield sites alongside, knowing these are needed to meet their needs, to ensure a five year supply of housing can be maintained.
- 3.1.25 The Policy as worded provides an unclear policy framework and will result in unnecessary delays in housing delivery. It could be left open to interpretation over what the threshold will be for when these sites can come forward ahead of April 2030 and so we do not consider the policy is clear, and therefore not effective or justified.
- 3.1.26 Instead, if the Council wishes to encourage brownfield development in the first instance, a far more proactive and positive stance could be taken, for example, by providing policy incentives on previously developed sites.

## 3.2 SUMMARY

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- 3.2.1 Whilst we welcome the fact that the Council is seeking to meet its housing needs, and some of the unmet needs from neighbouring authorities through this Local Plan, we have serious concerns around the approach taken.
- 3.2.2 First, we do not consider sufficient work has been done to determine whether WCC can accommodate more unmet need from surrounding authorities, especially from the authorities within the PfSH area which has well documented shortfalls. Further, given the increase in housing numbers stemming from the forthcoming standard method changes, we consider WCC could and is able to have gone further in terms of including other suitable and available sites within its spatial strategy.
- 3.2.3 We have concerns over the delivery, as anticipated, of housing from the three strategic sites. Strategic sites can stall due to both macro and micro issues and whilst they are all now delivering units we consider some caution needs to be applied to the trajectory as proposed.
- 3.2.4 We consider additional growth can, and should be, directed to some of the larger rural settlements, particular Denmead. there are sites available and suitable for development which can exceed the target set out in the Local Plan and would enable the village to maintain its role and grow proportionality over the Local Plan period.

- 3.2.5 Additional consideration between the relationship between the Local Plan, and Denmead Neighbourhood Plan is required to ensure both remain effective. It is unclear why the settlement boundary is not proposed to be changed for Denmead when this will need to happen to facilitate growth. This remains unjustified and does not provide an effective spatial strategy.
- 3.2.6 Finally, we consider there is no justification for the phased approach to the delivery of greenfield sites, which could see these held back until April 2030. There is a significant need for housing in Winchester and the wider South Hampshire area, and the Council should be taking a proactive stance to achieve this.



## 4 THE APPROPRIATE STRATEGY

- 4.1.1 We consider that the Council has not considered all reasonable alternatives in its spatial strategy, and should be considering further sustainable sites, especially in the rural areas to the south of the District, within the PfSH sub-region.
- 4.1.2 The Site north of Anmore Road, Denmead, would make a valuable contribution to the supply of housing adjacent to a sustainable settlement. It would contribute to the PfSH housing market need which is has a significant unmet housing need.

### Suitability

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- 4.1.3 The Site has been considered as part of the Strategic Housing Land Availability Assessment (SHLAA) which accompanies this consultation (Site DE11). The Council recognises this site is deliverable and developable, and confirms the site is free from any overarching technical constraints; something which is quite rare when delivering strategic residential sites.
- 4.1.4 The site is located immediately adjacent to the existing settlement boundary of Dunmead a Tier 3 settlement with a good range of services and facilities.
- 4.1.5 In landscaping terms, the WCC Landscape Sensitivity Analysis (2014) confirms that the site has low sensitivity in terms of both landscape and visual amenity. Preliminary landscape work done on behalf of Persimmon, confirms that the site can be delivered without resulting in harm to the wider settlement or townscape around Denmead, forming a logical extension to the existing settlement.
- 4.1.6 We consider that the settlement boundary of Denmead should be extended to allow the land to the north of Anmore Road to come forward for development through the Neighbourhood Plan. As reflected in Persimmon's previous "Call for Sites" submission and representations to the Reg. 18 Local Plan, this site is suitable and available for development. The site is capable of delivering c. 300 residential units, which can be appropriately phased, that can be delivered early in the plan period and make a valuable contribution towards the supply of housing in the District.
- 4.1.7 The details of the proposals are still be developed by Persimmon, and we would be pleased to engage with the Council and other key stakeholders to discuss this site further.

### Availability

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- 4.1.8 Persimmon is under contract with the landowner on the site. The Site is being promoted for residential development and could be delivered within the early stages of the plan period. The Site is therefore considered available for development. There are also no legal impediments to prevent this site from coming forward. In this respect, the site is available for development.

- 4.1.9 Development on the Site could be brought forward within the first five years of the Plan period, therefore significantly contributing to the short-term housing needs of the District.

## 4.2 CONCLUSION

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- 4.2.1 The Site is suitable and available and therefore should be allocated for development within the Local Plan. This would enable WCC to meet further unmet need stemming from the South Hampshire area.

## 5 SUMMARY

- 5.1.1 These representations have been produced on behalf of Persimmon in response to the Winchester District Proposed Submission Local Plan Regulation 19 Consultation.
- 5.1.2 Persimmon controls 'Land to the north of Anmore Road, Denmead' and is promoting the Site for allocation as part of the Local Plan process. The scheme can deliver c. 300 residential dwellings, including affordable housing provision, along with a community facility provision.
- 5.1.3 Evidence has previously been submitted as part of Persimmon's representations to the Reg. 18 consultation which demonstrates that the site is relatively free from environmental constraints and mitigation can be identified to address any environmental issues.
- 5.1.4 Whilst we are broadly supportive of the Council seeking to meet its own needs, and some unmet need from adjoining authorities, we consider the Council should have explored taking a high level of unmet need given the range of suitable sites available. Indeed, given the increase in housing numbers anticipated to be introduced shortly this would be reasonable. Given the availability of sites such as out Client's, we have concerns that the Plan may fail to demonstrate that it is either positively prepared or justified on account of the evidence provided. We urge the Council to reconsider its proposed settlement hierarchy and understand how sites in and around Denmead could help deliver additional housing.
- 5.1.5 Indeed, in this respect, we consider WCC should be working more closely with Denmead Parish Council to facilitate in excess of just 100 additional dwellings to the Parish by 2040 and to facilitate development coming forward by reviewing the settlement boundary in a more positive manner.
- 5.1.6 Persimmon's Site (Site DE11) would be a sustainable and suitable location for residential development. It is located immediately adjacent to the existing settlement boundary and has good access to the village's range of services.. Located in the PFSH housing market area, it would provide an ideal site to meet some of their unmet need. It would also help contribute to the Council's land supply in the first five years of the Plan. In the context of relying on strategic site delivery, it is beneficial to have smaller, more easily deliverable sites in the pipeline.
- 5.1.7 Persimmon would welcome the opportunity to discuss its vision for the site in further detail with the Council, and will work collaboratively with key stakeholders as details of the proposals are progressed.
- 5.1.8 Given the nature of our concerns, we would additionally wish to reserve our right to appear at the EIP, and our interest will extend to hearing sessions in relation to spatial strategy, housing supply, DTC and related matters as considered necessary.