

11 October 2024

Planning Policy Team
Winchester City Council

SLR Project No.: 433.000114.00001

Dear Sir / Madam,

RE: Land to the East of Pitmore Road, Allbrook: Winchester District Local Plan Regulation 19 Consultation

SLR Consulting has prepared this representation on behalf of Devine Homes in response to the consultation on the Winchester District Local Plan Proposed Submission (Regulation 19) (hereafter referred to as the 'Submission Plan').

This representation is made in respect of the site referred to as "Land to the East of Pitmore Road, Allbrook" ('the site'), which our client has a legal interest in and proposes to be included as an allocation for residential development. The site is shown edged red in Figure 1 below:



Figure 1: Site Location Plan

Background

The site is located within the Winchester City Council jurisdiction but is located on the edge of the administrative boundary of neighbouring Eastleigh Borough Council and adjoins the defined urban edge of the settlement of Allbrook. The site's close proximity to Allbrook means that it would form a natural sustainable extension to this existing settlement and would be closely related to its function and character. Allbrook is close to Eastleigh town itself, which is one of the largest settlements in the area. Access is proposed to be taken from an existing property facing Pitmore Road, therefore access to the site would sit within Eastleigh Borough, with the site itself within Winchester district.

There is no relevant planning history on this site, apart from an application in 2007 for the change of use of the land to equestrian use, which was permitted.

As it stands, the site is not included as a draft allocation in the Submission Plan, and as such, we raise an **objection** to the plan as it is considered that the site represents a suitable and sustainable location for growth. We understand that the site has not been before the Council before and has not therefore been assessed in the latest SHLAA to confirm its suitability and consideration for allocation. This representation will outline why the site is suitable for residential development (including its ability to be delivered within 5 years of the plan's adoption), and why it should be considered by the Council for inclusion as an allocation for housing in the Submission Plan.

Spatial Strategy

The primary spatial strategy for the growth of Winchester district as proposed in draft Policy SP2 of the Submission Plan builds upon the overarching strategy of the current adopted Local Plan to focus the delivery of housing and economic growth within three spatial areas (including Winchester Town, the South Hampshire Urban Areas, and Market Town and Rural Areas). Whilst this continued approach to growth is generally supported; it is flawed as it fails to consider alternative suitable sites that do not neatly fit into one of these spatial area categories, thereby potentially excluding sites that may perform higher in terms of sustainability and environmental credentials than some other sites.

In accordance with the proposed settlement hierarchy (outline in draft policy H3), by virtue of its location at the edge of Winchester's administrative boundary and being disjointed from any of Winchester's defined settlements; the site our client is promoting would presumably be included at the lowest end of the hierarchy, as a site in the 'Remaining Rural Area'. Whilst our



client's site would be classified by Winchester's hierarchy as site in a 'rural area' this is plainly not the case owing to the site's sustainable location directly adjoining the defined urban edge of the settlement of Allbrook in the neighbouring borough of Eastleigh. We believe this anomaly is missing the assessment of any site that sits alongside a larger settlement within a neighbouring authority and is clearly going to be highly sustainable as a result. See Figure 2 below which shows the sites proximity to Allbrook, and direct links to the major hub of Eastleigh.

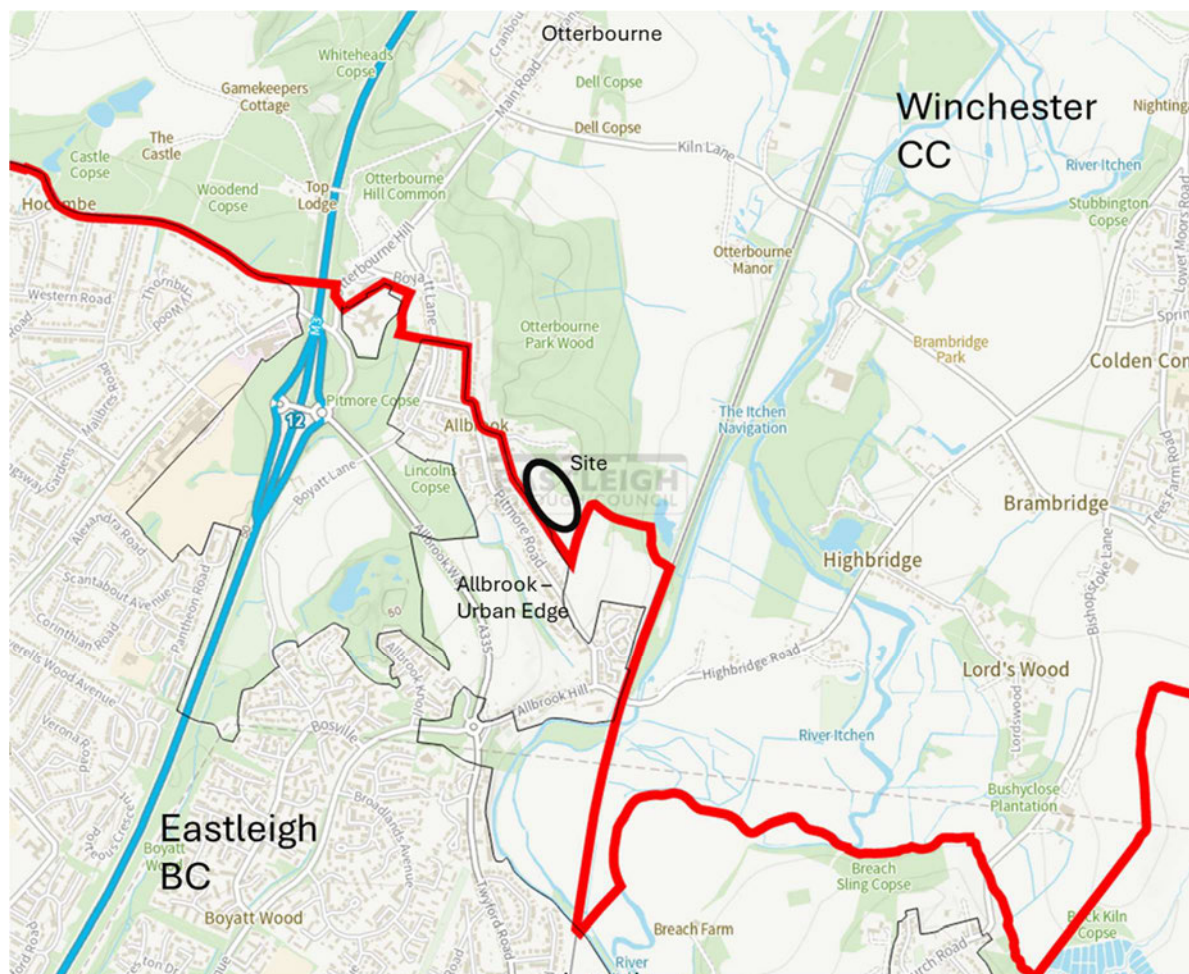


Figure 2: Extract from Eastleigh BC Policies Maps (showing the site located on the edge of Allbrook)

Whilst it is appreciated that this site has not been promoted to the Council before now, it is our view that this site could easily be overlooked as a sustainable development proposal because it is not connected to an existing settlement within Winchester and therefore sits at the bottom of the growth hierarchy. As the accompanying maps show, the site is very well located for development and would enable the organic and modest-scale level of growth to the existing settlement Allbrook which is located directly to the north of Eastleigh.



Housing Requirement

The Eastleigh Local Plan (2016-2036) was adopted in April 2022 and a local plan review has recently started. The plan review is likely to require a significant number of new site allocations in order to meet increased housing targets being put forward by the new Government. Eastleigh's current housing target (as derived from the current Standard Method) is 645 dpa; but the proposed standard method results in a 40% increase in required housing delivery with a target of 902 dpa for Eastleigh's next local plan. The allocation of suitable development sites in Winchester to meet the housing needs of adjoining authorities like Eastleigh will help to demonstrate that the authorities have worked positively and in collaboration with one another to meet cross-boundary needs (as required by NPPF 35).

It is noted that 1,900 homes are included in the Winchester assessment of housing need to contribute towards the unmet needs of neighbouring authorities (see Table H2 of the emerging Local Plan). As a relatively unconstrained authority, Winchester CC's commitment to provide 1900 homes above their Standard Method need is positive but does not go far enough because the unmet needs within the sub-region are substantial, and likely to grow significantly when the new Standard Method comes into force. WCC is one of 12 authorities that are members of the Partnership for South Hampshire (PfSH) whose latest agreed Spatial Position Statement (dated 6th December 2023), confirms a deficit up to 2036 of 11,771 homes across the subregion. The Government's proposed new Standard Method would increase Winchester's need to 1,099 per annum, which would equate to a need for 19,977 dwellings over the plan period. This number far exceeds the current requirement (15,115 dwellings), even when the additional unmet need is factored in. It appears that the Council is seeking to rush the new plan through with a lower housing requirement under the NPPF transitional arrangement, which will ultimately result in thousands of people unable to find housing in the area, thereby undermining the social and economic demands of the area.

We contend that the Council should be seeking to plan more positively for the known increase in housing requirements that are forthcoming, and plan to allocate additional site in sustainable locations that will be delivered quickly to contribute to the identified needs of the wider subregion.

Site Specific Details

The site our client is promoting is well-related to the existing defined settlement edge of Allbrook (Eastleigh) and is accessible by both private car and public transport to the major local highways network (the A335, and junction 12 of the M3 motorway) and destinations



beyond. The E2 bus routes run along Pitmore Road, providing direct public transport to Winchester (via Otterbourne) and to the centre of Eastleigh, where connections can be made to other destinations including Southampton Airport and Southampton City Centre. A number of existing primary schools are located within about 2km of the site (a 25-minute walk, or 5-minute drive), and two secondary schools (located in Chandlers Ford) are around 1km from the site.

The site itself is not constrained by any statutory or non-statutory environmental or landscape designation; and is outside the boundary of the South Downs National Park (SDNP) which (at its closest point) is located around 1km to the north-east of the site. Due to the distance between the site and the SDNP (coupled with intervening landforms), impact on the SDNP would be minimal. The site is well contained to its north by woodland, a section of which is classified as Ancient Woodland, therefore appropriate buffers of at least 15m would need to be designed into any future development proposal. The presence of Ancient Woodland along the northern boundary of the site is a defensible boundary that would ensure the site remains well-contained and would not give rise to any prospect of development spreading further north or east of the site. The proximity to the site of pockets of woodland (which are under the client's control), would provide opportunities for attractive links from the site to exiting and enhanced woodland walks, with the potential for an extension to the nearby Allbrook Meadows (subject to discussions with the Council and Parish Council) for the enjoyment of new and existing residents alike.

There are no listed buildings or other heritage considerations within or close to the site. Public Rights of Way (273/759/1 and 182/12/1) are located along the northern and eastern boundaries of the site; therefore, it is acknowledged that any future development on site will need to consider the setting of these routes. The requirement to provide a 15m minimum buffer for the Ancient Woodland would have the dual benefit of ensuring that the setting of the PROW is respected.

The site is wholly within Flood Zone 1; therefore, the risk of flooding is extremely low, and can be suitably managed by on site sustainable drainage infrastructure.

Access to the site is achievable and would be taken from an existing house that faces Pitmore Road. As the access point is proposed to be in Eastleigh Borough, discussions with Eastleigh BC and Hampshire County Council are being undertaken to provide agreement that access in this location is suitable and achievable, in accordance with the NPPF. The site will provide



pedestrian linkages to the existing footpath network along Pitmore Road (providing a lit and safe access to local facilities including the bus stops), as well as access to leisure routes including the nearby PROWs to the north.

An indicative plan of how the site could be developed for around 62 units is shown in the image below:



Figure 3: Indicative site plan showing a development of around 62 units



Summary

SLR Consulting has prepared this representation on behalf of Devine Homes in response to the consultation on the Winchester District Local Plan Proposed Submission (Regulation 19). This representation is made in respect of land that our client has a legal interest in (Land to the East of Pitmore Road, Allbrook) which is not currently selected as an allocation for residential development in the Submission Plan. For this reason, our client raises an **objection** to the Submission Plan, and requests that the Council considers this site as a sustainable opportunity for development which directly helps to meet known needs in neighbouring Eastleigh Borough. The site is sustainably located and directly adjoins the urban boundary of Allbrook in Eastleigh. The allocation of this well-contained site that is free from significant development constraints would assist neighbouring Eastleigh Borough Council meet their own significant housing needs as their own plans moves forward for review.

Devine Homes welcome the opportunity to participate in this consultation (Regulation 19) and strongly insists that the site subject to this representation is considered by the Council for inclusion as an allocation for residential development to help deliver the housing needed to meet the identified needs of the wider region. The site is in a highly sustainable location for residential development, close to a range of existing services and facilities which accords with the Council's overarching spatial strategy to allow existing settlements to grow in a sustainable manner.

The proposed development of the site will achieve a high standard of design that protects and enhances the local area's rural setting and character and would provide much needed new housing in a sustainable location on the edge of an existing settlement. There are no technical or environmental constraints that would preclude the development of the site, and with an appropriate design and layout it is considered that the site can deliver up to 62 dwellings without any detrimental effect on the existing character of the surrounds.

In line with tests set out within the NPPF, it is considered that the site's allocation in the Submission Plan would form part of a sound spatial strategy for new development in the Winchester district that works to help meet the needs of neighbouring authorities - thereby demonstrating that the plan has been positively prepared and is justified and effective.

Yours faithfully,





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