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Winchester Local Plan Reg.19 Consultation

Land East of Station Hill, Curdridge

CLIENT: PERSIMMON (SOUTH COAST)

October 2023
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Appendix 1 – Title

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 has an interest on a site to the East of Botley Railway Station: 'Land East of Station Hill, Curdridge'.
- 1.1.2 We consider this Site should be allocated within the Local Plan for residential development. It can provide between 250-350 residential dwellings- including both market and affordable homes as a standalone site, or a strategic allocation incorporating wider lands around Botley Station
- 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 CU15). 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 east of Botley railway station which provides direct services between London and Portsmouth. It is extremely sustainable and represents a logical choice for further development; particularly considering the site's location in close proximity to Botley, a defined "larger settlement" in the Eastleigh Local Plan (2022); and the construction of the Botley bypass which should unlock future potential for housing growth. The scope for growth in this location is recognised by the Partnership for South Hampshire who have identified it as one of five broad areas which are sustainable for strategic growth.
- 1.1.6 It is also considered that the position of Curdridge in the settlement hierarchy is incorrect and not justified. Indeed, when applying the Council's methodology correctly (in terms of the range of services) it should be defined as a larger rural settlement. Accordingly, the spatial strategy is not reasonable, nor justified, given that no growth is being directed to Curdridge in this Plan.
- 1.1.7 It is therefore considered entirely appropriate to direct growth to Curdridge, and given the suitability of the site east of Station Hill (Site CU15), allocate it for residential development. It would provide an opportunity for the Council to identify additional sites in rural settlements. It is considered this opportunity has been overlooked by WCC and its proposed strategy is unsound.

2 BACKGROUND CONTEXT

2.1 THE SITE

- 2.1.1 The Site promoted by Persimmon comprises circa. 10.2 ha of land to the east of Botley railway station (Site CU15). The site is bound by the railway line to the south, Outlands Lane to the east and the A334 to the north. It comprises agricultural land which as set out in the Call for Sites submission is of low ecological value.
- 2.1.2 Botley Railway Station lies immediately to the west of the site, providing direct and regular services between Portsmouth and London. In close proximity to the railway station is a petrol station with an associated convenience retail store; alongside an established employment site at Hillsons Road, to the south of the railway line.
- 2.1.3 Curdridge village is located to the north of the site. The Plan identifies Curdridge as a Rural Area settlement with no defined settlement boundary.
- 2.1.4 Botley is located to the west. This is located in Eastleigh District, and is a Tier 3 settlement (below Eastleigh, a Tier 1 settlement; and Chandler’s Ford and Hedge End; Tier 2). Botley is established and offers a range of services. The Persimmon Site has a logical relationship with Botley, accessed directly via the A334.
- 2.1.5 Botley Bypass is a new strategic 1.8 km road which extends from Winchester Street eastwards, crossing the River Hamble to a new roundabout at the junction between the A334 and the A3051, which is located to the south of the site. This has funding committed and is under construction.



FIGURE 2.1: SITE LOCATION PLAN

2.2 PERSIMMON SOUTH COAST

- 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 East of Botley Station (SHELAA Site CU15) for residential purposes. Persimmon has contracted with the landowner to promote this Site on their behalf.

2.3 DEVELOPMENT POTENTIAL

- 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).
- 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 It is anticipated that around 8 ha of the c. 10.2 ha site is suitable for residential development; taking into account the need for on-site open space, avoiding areas at risk from surface water flooding and leaving a noise buffer along the railway line. This provides the opportunity for between 250-350 dwellings based on an average density of c. 30-40dph which is considered appropriate for settlements such as Curdridge.
- 2.3.4 Access is anticipated along the north western perimeter of the site boundary, served by a "bellmouth" junction with a right turn lane designed in accordance with CD 123 guidance. This would also provide the opportunity to improve pedestrian connectivity by providing a pedestrian refuges island across the A334.
- 2.3.5 A second access onto the A334, located further to the east, has also been identified; to work in conjunction with the preferred access or as a standalone access for a smaller quantum of development.
- 2.3.6 There are opportunities to improve exiting pedestrian routes for residents on Outlands Lane to the station and Botley village. This would be incorporated into the scheme.

2.4 CURRENT HOUSING LAND SUPPLY AND DELIVERY POSITION

- 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

- 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 PARTNERSHIP FOR SOUTH HAMPSHIRE

- 2.6.1 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.
- 2.6.2 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:

"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".

- 2.6.3 The continued work of the PfSH is therefore supported and welcomed, to advocate and facilitate cross boundary planning.
- 2.6.4 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.
- 2.6.5 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.
- 2.6.6 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 Curdridge.

- 2.6.7 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 Station Road, Curdridge promoted by Persimmon, that could contribute even further in meeting the unmet needs of the South Hampshire area.

PARTNERSHIP FOR SOUTH HAMPSHIRE SPATIAL POSITION STATEMENT

- 2.6.8 As set out in the PfSH Spatial Position Statement (December 2023), in recognition of the strategic need for housing delivery in the South Hampshire sub-region, and the constraints to delivering this amongst the relevant authorities, the PfSH has looked to explore "Broad Areas of Search for Growth" to identify future strategic growth sites in the medium and longer term. It is anticipated that these areas should be considered for strategic growth through future Local Plans by the relevant authority.
- 2.6.9 A Broad Areas of Search for Growth Assessment Report (December 2023) has employed a constraints mapping approach to assess the potentially most sustainable broad locations, at the sub-regional scale, where it would be appropriate to identify sites for allocation in Local Plans. The Assessment contains a series of maps that apply environmental constraints and seeks to identify those accessible areas in transport terms. The PfSH emphasises that in undertaking this work it consistently works on the basis of 'cities and towns' first when identifying land for development.
- 2.6.10 The constraints mapping has led to the identification of five greenfield Broad Areas of Search for Growth, and this includes "East of Botley" (Winchester District). It is recognised that certain issues remain outstanding, and further consideration required, for example, loss of best and most versatile agricultural land and impact on strategic gaps. However, it demonstrates that on a sub-regional basis, this area is identified as suitable for growth in terms of being strategically sustainable and there being no overarching environmental constraints.
- 2.6.11 The purpose of this Assessment is to provide a steer to Local Planning Authorities in preparing their Local Plans, part of which, more detailed work will be required in terms of technical considerations including transport, deliverability etc. It is not an allocation, but does provide a firm steer on which locations are appropriate for future growth.

ADJACENT BOROUGHES

- 2.6.12 Eastleigh Borough lies immediately to the west of Winchester City. It adopted its Local Plan in 2022. The plan's soundness included committing to start a review

within 12 months of adoption; this was due to a shortfall in housing provision toward the end of the plan-period which equated to approximately c.2,600 dwellings.

- 2.6.13 The commitment to start a review of the plan within 12 months was considered a pragmatic approach by the Inspector undertaking the examination which would allow the plan to gain adoption. A review of the plan commenced within 12 months and has seen an update to the LDS during June 2023 and the SCI in December 2023. A Call for Sites has also been carried out. An Issues and Options consultation is scheduled for autumn 2024 which will assess options for growth; a preferred approach will be decided during summer 2026; the proceeding 12 months will test deliverability with a Reg 19 consultation anticipated for autumn 2027; submission during 2028 and adoption during 2029. It is currently preparing its Local Plan Review.
- 2.6.14 Most recently, Eastleigh confirmed (January 2024) that it had a 5.1 year supply of housing.
- 2.6.15 In the signed Statement of Common Ground between both WCC and Eastleigh Borough Council, it is agreed that due to the difference in plan-making timeframes between the Councils, it is not possible to agree a position regarding any potential unmet need – notwithstanding this, both authorities agree to continue in their approach to assessing cross-boundary matters and will update this Statement of Common Ground, when necessary, when such a time comes that a position regarding Eastleigh’s housing need can be established. Whilst there is no established unmet housing need arising at this point in time in the Eastleigh Borough, the WCC approach towards providing an ‘unmet needs allowance’ as a contribution towards unmet need elsewhere, if possible, is supported within the Statement of Common Ground. Both councils agree to support the ongoing partnership working on housing need and unmet need through the PFSH Spatial Position Statement and Statements of Common Ground.

3 REPRESENTATIONS

3.1 POLICY SP2: SPATIAL STRATEGY AND DEVELOPMENT PRINCIPLES

Meeting Housing Needs

- 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 site East of Station Hill (Site CU15), 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

- 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

- 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 site east of Station Hill. This is extremely sustainable 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. 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.
- 3.1.12 In this respect, we consider greater weight should have been provided to sites in close proximity to key public transport nodes, such as railway stations, in determining the spatial strategy. Across the South of England, with the well documented housing pressures which need to be carefully balanced against development on Green Belt and National Landscape land, absolute priority should be given to suitable sites which are located next to railway stations. These offer the greatest scope for sustainability and such opportunities should be maximised.
- 3.1.13 Indeed, we note that one of the overarching principles contained within the Local Plan Vision for new development is the "*concept of 20 minute neighbourhoods and active travel is ensuring that development is connected to public transport*"

rights of way and cycleways". Further, SP2 (iii) recognises that the new homes in the market towns and rural areas should be serving local needs in the most accessible and sustainable locations. Part (vi) states that development should make use of public transport... and integrate the development of homes, jobs, services and facilities to reduce car use. Suitable sites next to railway stations should be afforded significant weight.

- 3.1.14 In this respect, it is also noted, as mentioned above, that in considering options for strategic growth, the PfSH is identifying sites around smaller settlements to accommodate growth as the appropriate spatial strategy. We consider that the IIA should have considered sites in this broad area as a starting point.

2. Curdrige Settlement Designation

- 3.1.15 Curdrige is not defined within the settlement hierarchy, falling instead within the category "remaining rural area". For clarity we consider all settlements should be identified and categorised within the Plan to ensure it is effective.
- 3.1.16 Notwithstanding this, it is our firm view that the approach taken to identifying and categorising this settlement is flawed; which in turn has had knock on implications to the determination of the Plan's spatial strategy.
- 3.1.17 The Council updated its Settlement Hierarchy Review in August 2024 to accompany this Regulation 19 consultation on the Plan. This reflects comments made to the methodology at Regulation 18 stages, including those made by Persimmon who had concerns that the methodology applied was not consistent.
- 3.1.18 However, our concerns with how Curdrige has been classified remain outstanding and it remains unclear why these considerations have not been accounted for. To confirm, the missing services and facilities are set out below:

Daily Services

- 3.1.19 Convenience retail (daily needs) – there is a shop located at the petrol station. Given that the adjoining railway station and employment area are included as part of Curdrige in the facilities audit, the convenience store should also be included.
- 3.1.20 Daily bus services (hourly)- as part of the North Whiteley development the number 28 Fareham- Whiteley service has been extended and the frequency increased to an hourly service. Curdrige is easily accessible to stops serving this service. This route should therefore be included in the services audit.
- 3.1.21 Children's Play Area – The Reading Room Play Area has also been omitted from the audit (but is included in the Council's Open Space Assessment (2022)).

Other Services

3.1.22 The audit also misses the library, petrol station and postal services at the settlement.

Implications

3.1.23 Amending the hierarchy to account for the missing services and facilities would increase Curdridge's sustainability score from 14 to 23 and its sustainability ranking from smaller rural settlements, to Tier 2, Larger Rural Settlement.

3.1.24 It is not clear why this is not being reflected and shows inconsistencies in the approach being taking by the Council. The conclusions are not justified.

3.1.25 Accordingly, we would expect a settlement boundary to be identified for Curdridge to help guide development.

3.1.26 Further, we would expect growth to be directed to Curdridge and the failure to fully understand its role in the settlement hierarchy has resulted in a flawed spatial strategy. As noted above, it is served by a railway station. When planning to deliver growth in any district, the spatial strategy should provide significant weight to sites available near villages with railway station to offer genuinely sustainable development. It would be more than reasonable for Curdridge to have some growth allocated in this local plan. Further, it is located within the PFSH area which has significant unmet needs.

3.1.27 Sites in less sustainable locations; such as Otterbourne, Hursely and Sutton Scotney are being favoured for development due to the inaccuracies in the settlement hierarchy.

3.1.28 Policy H4 also limits the development potential of sites within settlements with no boundaries, which conversely have the effect of preventing sustainable growth in appropriate locations.

3.1.29 It is also noted that the Vision confirms that "The market towns and rural villages will remain attractive settlements, accommodating changes to support evolving communities and the economy, with modest growth to meet their needs underpinning the resilience of local services and facilities whilst retaining their individual identity, historic assets and rural character". It would be expected that growth is directed so the village can continue to grow commensurately and maintain their role in the settlement hierarchy.

3. Strategic Housing Delivery

3.1.30 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.

3.1.31 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
Strategic Allocations												
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
Strategic Allocations TOTAL		5272	607	555	535	535	485	485	460	410	1200	5272
TOTAL Large Sites Supply		7,034	869	750	699	683	663	745	713	582	1,330	7,034

3.1.32 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.

3.1.33 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.

4. Delivery of Key Infrastructure

3.1.34 The Botley bypass is a committed infrastructure project. It will provide a 1.8 km road providing a new connection between the A334 /A3051 Botley Road junction in the south-east to Woodhouse Lane in the west. The proposal also includes

associated widening and improvements to a 1.1 km section of Woodhouse Lane in order to support the integration of the new road.

- 3.1.35 The Bypass is being delivered by Hampshire County Council as a Highway Authority- it is not associated with any specific development proposal, albeit the business case notes that forecast levels of growth from development in the wider Botley area over the 10-15 years combined with traffic growth generally would only compound existing traffic problems in the area if the bypass were not to be delivered.
- 3.1.36 The rationale of the scheme is to improve air quality in Botley village, reduce noise and vibration caused by the volume of through traffic and numbers of heavy goods vehicles in the High Street, improve the environment for pedestrians and cyclists and reduce severance throughout Botley Village; and to enhance connectivity across the wider area.
- 3.1.37 The scheme would result in a reduction in traffic congestion on highway routes in and around Botley, contributing to a net improvement in air quality and noise for local residents. The development would provide a high quality and sustainable integrated transport system for the Borough of Eastleigh and Winchester District supporting the delivery of the development strategy for the area.
- 3.1.38 The majority of the new road lies within Eastleigh borough, with a short 600 m section located within WCC district.
- 3.1.39 Phase 1 and 2 have been undertaken, and funding for Phase 3 in place from Hampshire County Council to help drive forward the scheme. With a contractor in place it is understood that work is expected to commence in Spring 2025 and to be completed in 2027.
- 3.1.40 The business case for the Bypass emphasises that the need for this infrastructure is not associated with emerging development proposals. However, it is a significant investment the benefits of which should unlock further development to meet the needs of the wider area, across both authorities, to ensure this investment pays off. The Botley bypass will open up the highway network providing additional capacity which should unlock housing growth in this location.
- 3.1.41 This significant item of infrastructure does not appear to have been considered in the IIA in terms of understanding the spatial options of growth around this new road. We would expect this to be the case and considering the exclusion of this is not reasonable.

5. PfSH Broad Areas for Growth Assessment

- 3.1.42 As noted in Section 2, the PfSH has been looking at options to plan for growth on a subregional basis to ensure that housing growth is duly considered in the region. This approach is being advocated by the Labour Government who is prioritising the delivery of homes as part of its agenda.

- 3.1.43 It is accepted that the conclusions of this report were not available within sufficient time to influence this Local Plan; and we anticipate WCC will explore strategic growth East of Botley at the next Local Plan. It commits to doing this at para. 9.17 of the Plan.
- 3.1.44 However, it does reinforce that the rejection of Persimmon's site on land east of Station Hill (Site CU15) is not reasonable. The work undertaken by the PfSH in the Broad Areas of Search for Growth Assessments indicates that the site is suitable for development; being relatively free from environmental constraints and is a sustainable location in relative proximity to opportunities and services, and their scope in principle for good public and active travel connectivity (para. 1.2 of the Identification of Broad Areas of Search for Growth Assessments, December 2023).
- 3.1.45 Development of Land East of Station Hill could come forward in a manner that facilitates future strategic growth, a first phase that is planned accordingly against the context of wider growth.
- 3.1.46 Again, it is perhaps surprising that this area for growth has not been considered further in the IIA in terms of considering options for development. We suggest for completeness that this is addressed.

3.2 SUMMARY

- 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 there are flaws in the approach taken by the Council in terms of its spatial strategy. In our firm view, the settlement classifications are incorrect. For the reasons set out above, Curdrige is a more sustainable settlement than shown and should be classified as a larger rural settlement. This would have altered the approach in spatial terms to allocate growth, providing an opportunity to define a settlement boundary. It is important that settlements across the settlement hierarchy grow over the plan period commensurate to their role, so this can be maintained as other growth is introduced.

- 3.2.5 We also consider further consideration is required to the spatial options for growth stemming from the Botley Bypass. This significant infrastructure investment has the ability to unlock growth on the highway network in this part of the District and it has not been given due consideration.
- 3.2.6 Finally, whilst at an early stage, the PfSH has identified “East Botley” as a suitable area of growth for further exploration in future plans. This seeks to reinforce that the exclusion of sites in this part of the District is not reasonable or justified.

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 land east of Station Hill 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

- 4.1.3 The Site has been considered as part of the Strategic Housing Land Availability Assessment (SHLAA) which accompanies this consultation (Site CU15). 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 IIA scores this Site (ref. CU15) positively when compared to other sites within Curdridge, only scoring negatively on issues IIA9 (biodiversity and geodiversity) and IIA12 (land resource and minerals), which all sites within this village do (indeed, as noted in the IIA, the majority of residential sites score negatively in regard of IIA9 and greenfield sites in regard IIA12). It scores positively on matter IIA4 (public health and wellbeing)
- 4.1.5 The site is located immediately adjacent to Botley Railway Station and is located close to Botley village and the associated services it provides. This site provides a significant opportunity to utilise the railway station.
- 4.1.6 The existing employment site adjacent to the site provides employment opportunities.
- 4.1.7 Botley Bypass is also under construction and this significant investment should unlock sites like this for further housing investment.
- 4.1.8 In landscaping terms, preliminary landscape work indicates that there are opportunities within the site to reduce the impact of any development on the surrounding landscape. Generally, the larger the development area proposed, the greater its potential landscape and visual effects. However, the Site does provide some opportunities for development and re-development, most notably over the now defunct Hilltop Nurseries site and areas of lower landscape quality to the west of the watercourse. Through careful design, and consideration to the density and form of the development in order to provide an acceptable and appropriate landscape fit to the east of the watercourse which abut the settlement edge to part of Curdridge.

- 4.1.9 We consider that land to the east of Station Hill should be identified as housing allocation as reflected in Persimmon’s previous “Call for Sites” submission and representations to the Reg. 18 Local Plan. The site is capable of delivering c. 250-350 units that can be delivered early in the plan period and make a valuable contribution towards the supply of housing in the District.
- 4.1.10 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

- 4.1.11 Persimmon has an Option 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.
- 4.1.12 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

- 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 at Botley Station, Curdridge' and are promoting the Site for allocation as part of the Local Plan process. The scheme can deliver 250-350 residential dwellings, including affordable housing 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 Curdridge could help deliver additional housing.
- 5.1.5 Persimmon's Site (Site CU15) would be a sustainable and suitable location for residential development. It is located opposite Botley railway station and is extremely sustainable in that regard. 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.
- 5.1.6 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.
- 5.1.7 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