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# WINCHESTER DISTRICT LOCAL PLAN EXAMINATION

## Hearing Statement: Matter 2

CLIENT: Persimmon South Coast

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DHA/HY

### 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 MATTER 2: SPATIAL STRATEGY AND DISTRIBUTION OF DEVELOPMENT

## 1.1 INTRODUCTION

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- 1.1 This Hearing Statement has been prepared on behalf of Persimmon South Coast in response to the examination of the Winchester District Local Plan (WDLP).
- 1.2 Persimmon South Coast controls, inter alia, 'Land East of Station Hill, Curdridge' and is promoting the Site for allocation as part of the WDLP process for c. 250-350 residential units.

### **ISSUE: WHETHER THE SPATIAL STRATEGY AND DISTRIBUTION OF DEVELOPMENT IS POSITIVELY PREPARED, JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY.**

#### **Qu. 1**

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- 1.2.1 *The Settlement Hierarchy Review (2024) scores settlements and groups them which provides the settlement hierarchy in the District. Is the methodology used robust and the outcomes accurate? Is the distribution of development between the tiers of settlements justified and how has it been established?*
- 1.2.2 No. It is our firm view that the methodology which has been applied to designate settlements into a defined hierarchy is not being applied accurately. Accordingly the settlement hierarchy is ineffective. In turn this has knock on implications to the determination of the Plan's spatial strategy
- 1.2.3 Our comments in this regard relate specifically to Curdridge. Curdridge is not defined within the settlement hierarchy, falling instead within the category "remaining rural area".
- 1.2.4 We consider all settlements should be identified and categorised within the Plan, with an associated settlement boundary. This will ensure subsequent policies can be implemented effectively.
- 1.2.5 The Council updated its Settlement Hierarchy Review in August 2024 to accompany its Regulation 19 consultation on the Plan. This update was intended to address comments made to the Council on its methodology at Regulation 18 stages, including those made by Persimmon, who had concerns that the methodology applied was not consistent.
- 1.2.6 However, our concerns with how Curdridge has been classified remain outstanding and it remains unclear why these considerations have not been accounted for.
- 1.2.7 The missing services and facilities are set out within our Regulation 19 representations, and are not repeated here. However, the implications would mean that if amending the hierarchy to account for the missing services and facilities Curdridge's sustainability score would increase from 14 to 23. Its sustainability ranking would therefore change from a smaller rural settlement, to Tier 2, Larger Rural Settlement. This would have significant implications on the spatial strategy.

- 1.2.8 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.
- 1.2.9 Further, we would expect growth to be directed to Curdrige 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. Indeed, this is a factor which the Government has highlighted and confirmed in its 'Plan for Change' as a way to deliver its target of 1.5 million homes over this Parliament: unlocking land near commuter transport hubs as a sustainable strategy to deliver growth.
- 1.2.10 It would be more than reasonable for Curdrige to have some growth allocated in this local plan. Further, it is located within the PfSH area which has significant unmet needs.
- 1.2.11 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.
- 1.2.12 Policy H4 also limits the development potential of sites within settlements with no boundaries, which has the effect of preventing sustainable growth in appropriate locations.
- 1.2.13 Finally, it is noted that the Local Plan's 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".
- 1.2.14 It would be expected that growth is directed to Curdrige so the village can continue to grow commensurately and maintain its role in the settlement hierarchy.
- 1.2.15 In summary, it is considered that the position of Curdrige 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 Curdrige in this Plan.

## **Qu.2**

***Is the spatial strategy and settlement hierarchy as set out in Strategic policy SP2 justified as an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence?***

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- 1.2.16 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 and consider the Council could be more positive in terms of its approach.
- 1.2.17 Alongside, as noted above, due to the inconsistencies in the categorisation of settlements within the settlement hierarchy we consider the spatial strategy is ineffective and has not considered the sustainability of the settlements in the

District in a reasonable way. This would have had significant implications in terms of where the Council directs growth.

- 1.2.18 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 and not considering more reasonable alternatives. This is particularly the case given that WCC's need has increased by over 70% through the December 2024 changes to the standard method.
- 1.2.19 As noted in the Integrated Impact Assessment (IIA), affordability is a key issue within Winchester's housing market. 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 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.
- 1.2.20 We consider the Council should 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.
- 1.2.21 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. Whilst we understand these are established, we do consider there is a risk associated with placing too much reliance on the delivery of these sites. Delivery can often stagnate due to wider market factors and associated requirement to deliver significant infrastructure. For example, we are aware that the delivery of Kings Barton is likely to be significantly delayed due to extended Valuation Expert determination that is still unresolved. 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.
- 1.2.22 Further, 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.
- 1.2.23 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. Alongside, we do not consider that full and proper consideration has been provided to the inclusion of previously developed land within wider greenfield sites in the determination of the spatial strategy.

- 1.2.24 Finally, within the Partnership for South Hampshire (PfSH) 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. This includes a broad area at "East of Botley" which includes our client's Site. This demonstrates that in spatial terms this part of the District is appropriate for growth and this has not been explored fully by the Council in the IIA.

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**Qu. 3:**

***Is the proposed distribution of housing and other development supported by the evidence in the SHELAA, settlement hierarchy, and IIA, and will it lead to an appropriate pattern of housing and economic growth?***

- 1.2.25 No. For the reasons set out above, we do not consider that the proposed distribution of housing as set out within the Plan is appropriate. We have set out position in our answers to questions 1 and 2, and we do not repeat these points here.
- 1.2.26 However, we do highlight that our client's site, Land East of Station Hill, Curdridge, been considered as part of the Strategic Housing Land Availability Assessment (SHLAA) which accompanies the Local Plan (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.
- 1.2.27 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).
- 1.2.28 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. The existing employment site adjacent to the site provides employment opportunities.
- 1.2.29 Botley Bypass is also under construction and this significant investment should unlock sites like this for further housing investment.
- 1.2.30 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.

- 1.2.31 The site, therefore, is clearly suitable for development, as concludes in the SHLAA. It does not seem reasonable therefore that this site is not included as an allocation in the plan, alongside this part of the District not being considered as part of the wider Spatial Strategy. 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.
- 1.2.32 The site would also make a valuable contribution to housing in the southern part of the District, and in the wider South Hampshire area. The approach to exclude the site is not justified nor sound.

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#### **Qu. 4**

***Have settlement boundaries been defined in accordance with a clear and easily understood methodology that is consistently applied?***

- 1.2.33 As noted above, settlement boundaries are not identified for all settlements. Indeed, none is identified for Curdridge despite its sustainability credentials.
- 1.2.34 We consider settlement boundaries should be identified for all settlements to help guide developments, and indeed, to help apply Policy H4 more effectively. In not doing so, the plan will prevent sustainable growth being directed to appropriate locations or allow other policies in the plan to be effective.

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#### **Qu. 5**

***Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?***

- 1.2.35 No. We do not consider all realistic options have been considered. We do not repeat the points raised at Question 2, but consider it an oversight that further reasonable alternatives to growth have not been considered further when it comes to this part of the District; not least due to the evidence provided by PfSH which considers the area around Curdridge to be appropriate for growth. The Spatial Strategy is therefore not fully justified.

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#### **Qu. 6**

***Would the Plan's spatial strategy strike the right balance between the need for development across brownfield and greenfield sites and any related impact on housing affordability?***

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- 1.2.36 No comment. For the Council to respond

