

From: Judith Martin [REDACTED]
Sent: 25 July 2012 19:01
To: Rosemary Morton
Subject: Winchester District Local Plan Part 1
Dear Ms Morton,

Thank you for the invitation to update the comments I made on the pre-submission Local Plan Part 1, in the light of the NPPF and the Council's Schedule of Modifications.

The parts on which I commented previously were WT1, WT2, WT3, CP3, CP4, CP14, CP20 and 5.20. I shall endeavour to keep my updates to these sections. [note: I commented briefly on CP20 previously, bundling all these short comments under 'CP various'; you list the others in your page of submissions under my name, but do not list CP20.]

WT1

There seem to be no serious changes here, only policies on delivery, and a development trajectory that is optimistic to say the least. On housing numbers, no opportunity has been taken to amend the numbers predicted to be required in light of the continuing - and indeed worsening - national, European and global economic situation. As I write (25th July) it has just been announced that the UK recession has deepened, with GDP falling for three consecutive quarters, and the rate of fall increasing. Germany has had its credit rating lowered, and even China's economy is slowing. Winchester may inhabit a bubble, but it cannot be so sealed that it is untouched by any of these changes. It seems highly unlikely that the growth on which the LDF is predicated will come about.

Some of this is acknowledged in the modifications. Modification 19 removes the projected 13% employment growth in the District (and replaces it with nothing). To say "there is no longer a target for job growth/numbers" is disingenuous. I commented previously on the large number of redundancies from the heavily represented local public sector.

Modification 20, reflecting the 2012 retail study, says the need for additional retail floor space is minimal, and modification 38 drops the anticipated need from 22,000 square metres to 9,000 - a drop of 60%. With this diminished profile, it is hard to see that the Town, particularly, will continue to be a magnet for incomers, for whom the majority of new housing is to be provided. And yet, no attempt is made to reflect this in housing numbers.

WT2

Modification 46 adds to WT2: "Planning permission has been sought for this site in accordance with the above policy and a decision is awaited." This is not the entire case. CALA have actually objected to the LDF because they do not want to undertake development in "an organic sequence of development radiating from the southern urban edges of the site", as now called for in Modification 45 - which, if WT2 persists, I endorse.

The application of the bullet points in Appendix A of the Modifications to WT2 is scattergun. "Key delivery policies" include:
"ensure the status of the water environment... in the District is maintained";
"provide, protect and enhance green infrastructure";
"ensure high quality design takes account of character, local distinctiveness

and sustainable design principles".

These are all deemed relevant to WT2 and Barton Farm, and indeed align with the NPPF.

However, to:

"mitigate against the impacts of, and adapt to the effects of, climate change through promoting lifestyles and businesses which are sustainable for the environment and maximising the use of technologies that are available to reduce waste and carbon emissions" and

"ensure high quality design takes account of character, local distinctiveness and sustainable design principles"

are not deemed relevant to WT2. s. 60 of the NPPF says it is "proper to seek to promote or reinforce local distinctiveness."

The last bullet point in the Appendix is of particular significance: "maximise the use of the District's land resource through the promotion of higher densities and creative design where these are appropriate and make a positive contribution to the public realm". S. 47 of the NPPF says local planning authorities should "set out their own approach to housing density to reflect local circumstances". In Winchester Town local circumstances could include the continuing popularity of areas such as Hyde and Fulford, with their considerably greater density than that planned for Barton Farm. All the LDF seems to propose is to monitor density.

The to-ing and fro-ing with appeals, inquiries and ministerial edicts over the CALA application has been notable. However, pending the latest decision from the Secretary of State (due by the end of September) and bearing in mind his notes in the letter from CLG of 28th September last year, it seems unwise to persist with WT2. The letter then said "[he] has also identified conflicts in relation to national policy in PPS7 given the loss of agricultural land. The Secretary of State has concluded that the development of this attractive greenfield site would undermine the character of the landscape and the key characteristics of the relevant Landscape Character Areas. The development would also alter a valued part of the setting of the historic city of Winchester."

The NPPF says in s. 112: "Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." Land at Barton Farm is in the 'best and most versatile' classification.

The NPPF also talks at length about the setting of heritage assets. I know that the City of Winchester Trust is making representation on this, but I contend, with them and, it would appear, with the Secretary of State, that the ancient city of Winchester constitutes in its entirety a heritage asset and that its setting should be protected. Heritage assets are defined in the Glossary of the NPPF to include designated assets, as per English Heritage recommendation, not to exclude undesignated ones. Indeed, modification 137 includes the protection of undesignated assets. Modification 115, "impact on areas designated for their local or national importance, such as Gaps and the South Downs National Park, conservation areas and heritage assets, including their setting" is made in order "to provide protection for designated environmental areas and consistency with other policies". Both these modifications conflict with WT2 and fail to protect the setting of Winchester. (see comments on CP20, below)

Landscape is given much attention in the NPPF; it is itself specifically included in the list of heritage assets. Section 109 says "The planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes..." The majority of evidence given at the Public Inquiry for Barton Farm demonstrates that the landscape there is

valued.

Although you do not ask for comments on the modifications in the light of the Localism Act, nonetheless the NPPF comes under that Act. Much of the focus of the Localism Act is on community involvement and local decision-making. Again, there is no questioning the level of local opinion concerning Barton Farm and WT2. (I should add that I do not live anywhere close to the site; the only direct impacts the development will have on me, should it take place, are more crowded trains, extra cars on the roads, and perhaps longer lists at the doctor's surgery.)

WT3

Much of the above, re. WT2, applies to WT3, above all perhaps the element of local commitment to the area as it currently is. (And I don't live near Bushfield either.) That degree of community involvement is not readily obvious from the very condensed summary of key issues raised in consultation. Although there is no Bushfield equivalent of the Save Barton Farm Group, there is a dedicated group asking that the site should be declared a Town or Village Green.

The only body supporting the idea of an "opportunity site" for a "creative hub" is the BID, as noted above - not the University of Winchester or the Art School or any other body that might reasonably be thought to want to promote creativity.

Modification 115 is even more relevant here, because the site is adjacent to the South Downs National Park.

Bushfield is every bit as important for the setting of Winchester as Barton Farm. If, as the Secretary of State says "The development [there] would ... alter a valued part of the setting of the historic city of Winchester", there can be no doubt it would at Bushfield.

Modification 48 has been made at the instigation of PINS, but is it valid to have a policy for "future, currently unidentified, needs"? There is no policy for a nuclear power station, for example, or a major wind farm. Could they go at Bushfield? It might be argued that that would be in keeping with the NPPF on sustainable development - although the modification does acknowledge the site's sensitive location.

This is an absurdly and dangerously open policy, and despite whatever modifications have been made, and whatever pleading from the Church Commissioners, it should be dropped.

CP3

Modification 93, that 70% of affordable housing provision should be for rent, is welcome, but my concern in my original submission, that there is no precision in dealing with thresholds, remains.

CP4

There are no modifications needing comment. My original remarks stand.

CP14

Ditto.

CP20

The inclusion of 'and their settings', in modification 137, at the behest of English Heritage, is extremely welcome, although the continuing presence of WT2 and WT3 suggest it is not strong enough to do justice to all the emphasis in the NPPF on conserving and enhancing the historic environment (s. 126 et seq.).

In fact, s. 126 states: "Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment." To my knowledge, the only LPA to do this so far is Dover - a 600+ page District Heritage Strategy, currently out for consultation. Castle and White Cliffs notwithstanding, Winchester has considerably more to conserve and enjoy. It is arguable that no significant development should take place in Winchester - the Town at least - until WCC has produced a thorough Heritage Strategy.

5.20

5.20 has been deleted; I welcome the changes in modification 90.

I would like to say that I do not find the Council's summary of the Key Issues raised through Regulation 27 at the pre-submission stage, wholly adequate. I do not expect you to note every comment I made, or that every other individual or indeed group made, but to say about CP20 only that "Policy should refer to the setting of heritage assets and clarify what is meant by conservation areas" is to fall far short of what English Heritage, for example, said. I trust the Inspector sees all the submissions, and does not have to rely on the summary, tempting as that must be.

It would also have been helpful to attribute the comments in your Key Issues summary, as by no means all of them are disinterested, or even local or regional. No local commentator suggested, in WT1, that insufficient land has been identified for housing purposes - such comments come from national developers and their agents. And I was interested to note that the comment on a "creative hub" at Bushfield (WT3) came not from the Church Commissioners but from the BID - whose remit is normally taken to run only as far as the inner edges of the shopping centre. But it took a certain amount of digging to discover that. I had also expected to find the Church Commissioners under "C" - but they are under "T" for "The Church Commissioners". Searching the Schedule of Proposed Modifications online is made more challenging by the fact that sometime a stop appears in a policy number: CP20 becomes CP.20, for example. Better consistency in editing would have helped.

In all, I find it depressing that the only modifications made have been because of comments from regional or national bodies or institutions: PINS, of course, plus Hampshire County Council, the Highways Agency, Southern Water, the Environment Agency etc. - and the Church Commissioners. It would appear that all individual submissions on the sections of the Framework above were dismissed, despite the fact that the tagline to CLG on the cover of the NPPF is 'community, opportunity, prosperity'. S. 155 of the NPPF says "a wide section of the community should be proactively engaged" - it has been, but its opinions have been swept aside. Even the local bodies that have some democratic accountability, as in election of officers, such as Friends of the Earth, CPRE and the City of Winchester Trust, have been ignored. For some reason comments from outside Winchester Town seem to have had more impact.

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yours sincerely,

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