



Twyford Parish Council
c/o 5 The Close, Kiln Lane, Brambridge Park
Brambridge, Eastleigh, Hampshire, SO50 6HT
01962 715535
debbieharding@twyfordpc.hants.gov.uk
www.twyfordpc.hants.gov.uk

Rosemary Morton
Programme Officer Winchester District Local Plan Part 1
Winchester City Council
c/o Strategic Planning
City Offices
Colebrook Street
Winchester
SO23 9LJ
Dear Ms Morton

Winchester District Local Plan part 1 – Joint Core Strategy.
Additional representation by Twyford Parish Council. **User ID 30049**

To the Local Plan Inspector.

Dear Mr Payne,

Winchester District Local Plan: Part 1 – Joint Core Strategy.
Additional representations by Twyford Parish Council. User ID 30049

Twyford Parish Council (TPC) has commented on the following policies and objected to them:

- MTRA3: Settlement Policy for villages
- MTRA4: Countryside Policy - general;
- MTRA5: Countryside Policy: economic;
- DS1: Gaps between settlements
- WT3. Bushfield Camp Opportunity Site.

Winchester City Council (WCC) has given us the opportunity to make further representations in respect of:

1. Modifications June 2012
2. NPPF March 2012.

In addition the South Downs National Park Authority has clarified their own programme for plan preparation for the National Park area and their support for neighbourhood planning; and this too forms part of these additional comments.

A final matter is the imminent publication of the small area forecasts of the 2011 National Census, which will provide a vital input into neighbourhood plans.

I will comment on each of TPC's objections as appropriate where there is additional information or modification or new policy justifies it. I include some corrections of Twyford parish Council's submitted objections.

Twyford Parish Council restates its view that both WCC and SDNP have failed properly to apply the Environment Act 1996 Section 62 and consequently the plan is not legally compliant. We are surprised that WCC and SDNP have not taken the opportunity to state their position on this point which is fundamental to the plan.

None of TPC's objections are withdrawn

MTRA3: This is the Settlement Policy for villages and includes the carrying forward of the settlement boundary from the current Local Plan.

The objection is to the settlement boundary for Twyford being carried forward into the core strategy without a full examination in the SEA, and an updated evidence base and testing of alternatives. This policy devised over 20 yrs ago has not been revised. It has led to substantial erosion of village character via its presumption in favour of infill etc and at increasingly high densities. This policy should not be carried forward into the newly designated National Park with its statutory objectives without full testing and review of its potential for harm. No distinction is made by MTRA3 between the villages inside and outside the SDNP, so the extra value to be placed on villages in the National Park is given inadequate explanation for development management purposes.

The NPPF firstly stresses time and again that policies should be based on up to date evidence base. MTRA3; the settlement boundary for Twyford in particular is not up to date. There has been no assessment of the harm caused by consents within the current boundary or the potential for further harm. Nor does the SEA test MTRA3 against Policy CP9 for the SDNP. Nor is the alternative to a settlement boundary tested e.g.: criteria based policy. On the other hand, if the boundary is to be kept, substantial development has been permitted just outside its boundary.

The NPPF in Paras 183 - 185 introduces for the first time the new policies for Neighbourhood Plans; and this is a further reason why past policies should be reviewed as well as the policies of the Core Strategy itself. Neighbourhood plans are intended by NPPF to give communities:

‘direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.’

Infill within villages in general but Twyford in particular does not achieve this. The settlement boundary and presumption in favour blocks the community's ability to plan for itself.

However Parish Councils may not question approved development policies where they are of a strategic nature. The inclusion of policy boundaries within a Core Strategy/ Local Plan must be assumed to be strategic. To comply with Para 184, neighbourhood plans within SDNP villages will be committed to permit development which may harm their appearance etc.

However what Strategic role does the settlement boundary fulfil in SDNP? How can development in South Downs villages such as Twyford be said to be strategic? Advice on National Parks states that National Parks should not have housing targets. Consequently they must be ruled out of contributing to any District wide requirement. In housing terms they cannot be strategic. Generally housing is the dominant type of development within village settlement boundaries. Although similar considerations would apply to economic development in National Park Villages. The economic and social role including housing is to be focussed on the NP communities, not District wide targets or needs.

For these reasons and the settlement boundaries in NP villages are not strategic. They could be omitted with no harm to the economic and housing objectives of the District/National Park.

In a number of public presentations, Winchester CC has discussed neighbourhood plans with Parish Councils in the context of their own development plan programme. They have suggested that cooperation between Parish and District in the forthcoming Allocations document would provide a simpler route to neighbourhood-friendly policies, and be a simpler, quicker, cheaper and

less risky approach than embarking on neighbourhood plans. However they have said that this offer would not be available to National Park villages, as the responsibility will lie with the SDNPA.

For their part the SDNPA appear to be taking a different approach in which the Parishes will be supported in preparing neighbourhood plans. However, it is not clear whether the SDNPA has appreciated the problems which could be caused to either its own freedom to plan in a National Park friendly way or the straightjacket which it would impose on Parishes and communities tackling neighbourhood plans.

The timetable for the South Downs National Park plan is that a start is now being made on the Core Strategy which I understand is to include both strategic and local policies. While, I suppose SDNPA will have the opportunity of reviewing village boundaries if they have been approved as part of the WDLP Part 1, if TPC wishes to start on the neighbourhood plan before that (as is likely), it will be bound to accept the village boundary as the basis of what it does. It would be of advantage too for SDNP to have the benefit of the experience of SDNP villages and their aspirations feeding into the emerging strategic National Park plan. There is no such experience within the National Park Parishes at present nor is there any legacy of village planning being handed on by WCC to SDNP.

A further element which will be of fundamental assistance to neighbourhood plans is the publication of the National Census's small area forecast. These will give an up to date profile of a range of local data which are not currently available. It appears that a great deal of change has taken place in villages over the last 10 years but in any case there has been no attempt at a systematic application of the available information in the preparation of plans at the village level. Over the last 20 years the LPA's focus has been on District wide plans and then on core strategies. Village planning has been neglected. This means that the information base for assessing the effectiveness of past policies has been lacking and has not been available or been the focus of interest of WCC in its plans.

However these will not be available for another four or five months, which is another reason for delaying the start of plan preparation, to the uncertainty of the neighbourhood planning process.

Answers to Questions (only where changed)

Q5: Effective: NO

Q6 : as above

Q7: The recommendation of change to the plan is that the settlement boundary for National Park villages and Twyford in particular should be withdrawn or stated to be 'non-strategic and not binding on neighbourhood plans' and for review both by neighbourhood plans and by the SDNP Core Strategy etc.

Q 8 (attending and giving evidence at the hearing): **TPC now wishes to attend.**

MTRA 5 - Economic Development in the Countryside.

TPC's objection to this as with MTRA3 is its failure to distinguish between National Park and other parts of the District. It appears to override most other considerations. However MPPF while it may have reduced the protection of general countryside has restated that National Parks should be given the highest level of protection. Consequently a separate policy for economic development within the National Park is clearly called for and the plan cannot be sound without it.

The matter is of particular importance within Twyford which has straddling its settlement boundary but largely in the countryside, a major commercial site with multiple uses and scope for expansion. Furthermore because this site is outside the settlement boundary its relationship to the Neighbourhood Plan is yet to be established. It is a dominant use within the village but in planning policy outside it. The owner of this site has objected in terms that indicate it is an issue of concern to them (see objector no 30088).

This policy would commit the Neighbourhood Plan to accept additional development on this site, which could well affect the character and amenities of the village further.

The SDNP core strategy is the appropriate vehicle for considering this further.

Recommendation for change to plan: WDLP to exclude policy from application with SDNP.

Q8. Attending enquiry. **Twyford Parish Council wishes to attend and give evidence.**

The NPPF also divides the three grounds for judging whether a plan is sound into four in Paras 183 to 185; this highlights the need for a plan to be able to demonstrate that the plan is the most appropriate strategy, considered against the alternatives. However in the case of MTRA3, 4 and 5, it appears that the testing of alternatives is inadequate. It may be argued that they are not “strategic” but if so then the distinction needs to be clearly made between those policies which are strategic and which are not. The inclusion of non strategic policies within core strategies appears not to be appropriate.

In any scenario, changes should be made to these three policies to give the SDNP the proper protection that NPPF requires. Unless these changes re made the WDLP cannot be sound.

Yours sincerely,

Chris Corcoran

On behalf of Twyford Parish Council

Copies: Clerk; Chairman; vice Chairman; Planning Ctte Chairman and vice Chairman.

.

(

Regards

Chris Corcoran

For an behalf of Twyford Parish Council