

**Winchester District LPP2 – Public Examination**

**Hearing Day 4 – 18 July (PM)**

**New Alresford – Policies NA1 - 3**

**APG Response**

**Matter 9:**

- i) Are the policies and proposals for growth and change in this area appropriate and justified, including in relation to the NPPF, and in terms of environmental, economic and social impacts?
- ii) Are they clear and deliverable, including in respect of the associated infrastructure requirements?

**Introduction**

- 1 The Alresford Professional Group (APG) view is that Winchester District Local Plan Part 2 (LPP2) is unsound with regard to policies (NA1 – 3) for New Alresford. The grounds for APG’s view are fully explained in its comments (507873173) on the Pre-Submission Plan 2015.
- 2 This statement covers the:
  - APG vision for the town;
  - the unsoundness of the WCC strategy for New Alresford and;
  - addresses specific soundness of policies NA1- NA3 issues and remedies to these with proposed changes to make Plan sound.

**The APG Vision**

- 3 The character of Alresford is defined by the natural limits of the flood plains of the Arle and Itchen to the north and west of the town and the A31 Bypass to the south and, the Sun Lane axis to the east. Apart from minor incursions development over the last 50 years has kept within these limits and there are no sound grounds to substantially breach them during the plan period for LPP2. APG’s vision is illustrated in Appendix 1 and reflects the submission submitted to WCC in December 2015 (507873173). It proposes development in accordance with LPP1 policies MTRA 1 & 2 and thus substantially within the town’s character limits. It recognises that Sun Lane site is problematical for development by its virtual landlocked nature, the prominence of its southern slope and its intrinsic high agricultural value (Grade 3A). So the number of

dwelling are limited to 160 on the north slope, below the 105 metre contour to limit undue change to current character of the town. Other housing would be on the Avenue and off New Farm Road with good access to the existing main roads & bus routes, and within the town's current character limits. Existing employment land should be primarily retained with appropriate redevelopment for contemporary employment use to cater for limited growth needs. The higher land on Sun Lane could still be used for open space requirements as proposed in LPP2.

- 4 The APG vision meets all the soundness tests in that it:
  - meets objectively assessed needs and thus **positively prepared**
  - is the most reasonable of alternatives and thus **justified**
  - is deliverable and thus **effective** and
  - **consistent** with policy especially LPP1

### **WCC Strategy for Alresford**

- 5 On the other hand the WCC Strategy as expressed in LPP2 is considered unsound. The overall approach by Winchester City Council (WCC) in LPP2 to New Alresford (Policies NA – NA3) is based on the concentration of development mainly, east of Sun Lane and to a lesser extent the redevelopment of the Dean (NA2). This is considered generally an unsound approach
- 6 It is not **positively prepared** in that the development on Sun Lane necessitates a new junction on the A31, which would otherwise not be required. There is no evidence that the town is inadequately served by the existing junctions. This is a disproportionate investment which would only partially mitigate traffic impacts of the Sun Lane development and perversely generate further traffic to the detriment of Alresford, but particularly it's south eastern quarter.
- 7 There is no evidence that the employment land proposal at Sun Lane is needed. WCC recognise that the businesses displaced by redevelopment in the Dean (NA2) may not relocate to this land. Evidence submitted by APG demonstrate the likely need for employment land can be accommodated by existing premises and land, within the town and within commuting distance, Winchester, Eastleigh, and Basingstoke. Furthermore the allocation is disproportionate, representing c80% of employment land developed in Alresford over the last fifty years and well exceeds requirements for the Plan period.
- 8 It is not **justified** as realistic alternative sites at The Avenue and west of New Farm Road are available that do not create the adverse environmental and traffic impacts of that proposed for the land East of Sun Lane. Although the Sustainability Appraisal prepared by WCC is supportive of the Sun Lane site the conclusions of this have been contested by APG (507873173) and subject to a separate statement for another session of this Hearing.

- 9 It is not **effective** as insufficient evidence has been produced that the implementation of the new junction can be achieved within appropriate design and safety specifications. Moreover, its impacts, especially as the illustrative design is for a limited moves junction, are uncertain. It is unacceptable to defer the assessments for such strategic infrastructure for a later part of the planning process without an understanding that it can be implemented or what contingency arrangements may be required. The High Court has ruled that a plan that has failed to address these matters is 'unsound'.
- 10 No substantial evidence has been submitted that the employment allocation on Sun Lane can be developed within the Plan period. Furthermore, the multiple ownerships within The Dean (NA2) question the viability of the master plan approach to redevelopment of this allocation.
- 11 It is not **consistent** in that the proposed redevelopment of the Dean (NA2) is not in accordance with the NPPF concerning town centres. It jeopardises existing employment in a sustainable location that is supportive of the town centre. It is further inconsistent with Winchester Local Plan Part 1 (LPP1 – MTRA1 & MTRA2) in that the strategy for Alresford will have a detrimental effect on its character. This will be caused by: the additional traffic within the neighbourhoods in south east Alresford; the landscape impact of the development breaching the ridge line east of Sun Lane and; damage to amenity from the proposed junction.

#### **NA1 - Car Park Provision**

- 12 The latter part of this policy commencing '**An additional 50 -100 public parking spaces are proposed in conjunction with redevelopment in the Dean ....**' is considered unsound.
- 13 It is not **justified** as WCC has not demonstrated that a car park will not have significant adverse traffic and safety impacts generated by significant additional traffic and turning movements on the cross roads on the western edge of the town centre. There is an alternative proposed by APG by the inclusion of additional parking spaces as part of a development at The Avenue site, adjoining the existing public car park at ARC.
- 14 It has not been demonstrated that this policy is **effective** in that the fragmentation of ownerships within the Dean allocation is likely to frustrate its implementation. Public car parking in Alresford is not a high value use and without local authority financial commitment it is unlikely to be implemented. Moreover, the best location for a public carpark is now the subject of elderly care housing proposal. Furthermore, parking for a 100 cars could require 0.8 hectares of land which is a disproportionate amount of high value land for a low value use. It is doubtful if parking is viable.
- 15 It is proposed that this policy would be made sound by alteration to the wording thus:

**‘An additional 50-100 public parking spaces are proposed in conjunction with development opportunities which may arise .....’**

## **NA2 – The Dean Housing Allocation**

- 16 This policy should be substantially revised as it is unsound.
- 17 It is not **positively prepared** as it jeopardises existing employment in a sustainable location. It is on a public transport route, close to town centre services with undoubted symbiotic relationship between the two areas. It provides for a range of small to medium enterprises that is consistent with the economic structure and character of Alresford. There is no evidence that full redevelopment will benefit the town and it is doubtful the type of businesses in the Dean would relocate to a self-evidently more expensive site at Sun Lane which is highly unsustainable. It is recognised that redevelopment of businesses on a case by case may be required and some environmental improvements with some housing – elderly care housing has merits would be desirable. However, this should be in the context of protecting the Dean for B1 employment use.
- 18 It is not **effective** because the Dean employment land is covered in multiple ownerships and it is unrealistic to assume that that any one landowner will prepare a ‘masterplan’ that can be implemented for the wider area. Moreover, there is no evidence that there is a general wish for the owners to sell their land collectively; instead two sites are being actively promoted independently for residential development only.
- 19 The policy cannot be **justified** as it is detrimental to the character of Alresford and the proposed open space is inappropriate at this location. The Dean is adjacent to; the Town’s main recreation area with formal and informal facilities and; the Arle footpaths. The priority is to provide better linkages to these facilities not additional ones
- 20 It is proposed to make this policy sound it should be worded thus:

**‘Land at the Dean, as shown on the Policies Map, is allocated for the development of a maximum of 75 dwellings and commercial, principally B1 use and other business uses compatible with the area. Planning permission will be granted provided that detailed proposals accord with the Development Plan and meet the following specific development requirements**

**Individual site proposals should be designed to enable future linkages to adjoining land and to avoid harm to amenities or operation of adjacent land and businesses.**

**Development may include the provision of offices to meet local needs as well as housing suitable for the elderly**

**Provide safe vehicle, pedestrian and cycle access to and from The Dean and contribute to any off-site junction or pedestrian improvements necessary**

**Retain and reinforce landscaping on existing boundaries around the area and provide for the improvements to the public realm on The Dean**

**Proposals should be accompanied by a comprehensive assessment which sets out the nature and extent of any contamination present on the site, together with the programme of remedial works to ensure that any unacceptable risk from contamination is avoided.**

**Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider:**

**Contribute to the expansion of Sun Hill Infants and Junior Schools and other infrastructure needed to make the development acceptable in planning terms.**

### **NA3 – Sun Lane Mixed Use Allocation**

- 21 The proposed Sun Lane allocation will have a significant adverse impact on Alresford from a traffic, landscape, amenity perspective and is unsound.
- 22 It is not **positively prepared** in that the employment land allocation is not based on any objective assessment. APG have submitted evidence demonstrating that there is no proven demand from existing local businesses or inward investors. Furthermore, there is no evidence that existing businesses in The Dean would relocate to the site, which WCC admit in the text of the Plan. Thus, it appears the allocation is ill founded. Moreover, the 5 hectares does appear out of proportion to the amount of employment land developed over the last 50 years and substantially still exists at Prospect Road, Signal House, New Farm Road and The Dean.
- 23 There is no explanation for B8 (warehousing etc) use . It is out of character with Alresford's economy. It is poorly located relative to the national road network and therefore the allocation is ill placed for such use.
- 24 There is no evidence that the proposed junction with the A31 is based on requirements for the town. During the consultation process for LPP2 an examination of Alresford's needs was considered but during this process there was no suggestion that an additional access to the A31 was required. It seems that the need for the junction is generated to serve 5 hectares of employment land and about 4 hectares of housing (the balance between WCC's and APG's proposals). This seems disproportionate. Is it reasonable to create a new grade separated junction onto an A class road with all the attendant adverse impacts and costs this will generate to Alresford for the sake of 9 hectares of development?

- 25 The Sun Lane allocation is not well **justified** compared to alternatives proposed by APG because of the impacts on the environment and traffic effects. Although APG accept that about 6 hectares of housing at the north end of Sun Lane would be acceptable along with some open space uses, the amount proposed in the Plan would have disproportionate adverse impacts. The employment land allocation is not sustainably located being isolated from bus routes and significant distance, 1,000+ metres from the town centre.
- 26 The allocation with the policy wording suggest that the proposed Sun Lane housing would have limited connectivity by car from the rest of the town and 'quarantine' it from the local community. Sun Lane, Tichborne Down and Nursery Lane all have facing dwellings, on road parking and have pinch points. Mitigation measures on these roads to prevent extraneous traffic will only serve to isolate the development on Sun Lane. Encouraging pedestrian and cycle movements is desirable but there are still significant movements connected with work, shopping and leisure that require the car and the Sun Lane site is not best located for these purposes. The alternative sites proposed by APG do not have this issue.
- 27 Other than that the overall development will generate significant traffic of which a significant proportion will use local roads detrimental to safety and amenity of residents.
- 28 The landscape impact of the Sun Lane development is significant. The Plan accepts the need to protect the ridge and to do this development would have to be restricted below the 105 metre contour. The proposed 325 dwellings are unlikely to achieve this unless densities are increased to a level out of character with Alresford. The employment development is likely to have the same effect, but more importantly will be visible from the A31, especially as the long established planting on the road would have been removed.
- 29 The proposal is not **effective** as no substantive evidence has been produced that demonstrates the proposed A31 junction can be constructed in accordance with highway design and safety standards. The matter has to be clarified at this stage of the planning process as it is a strategic issue on which the whole Plan depends to be realised. If the proposed junction cannot be built over 300 homes are in jeopardy!
- 30 The Sun Lane site is not **consistent** with LPP1 policies MTRA 1 and MTRA 2 in that the character of Alresford will be unreasonably changed and there is clear community opposition.
- 31 In order to make the policy sound it should be altered thus:

**Land east of Sun Lane, as shown on the Policies Map, is allocated for 6 hectares of residential development (about 160 dwellings) and c20 hectares of informal and recreational open space and burial ground. Planning permission will be granted provided that detailed proposals accord with the Development Plan and meet the following specific development requirements:**

***Repeat the sub clauses as published but omitting references to the employment land and A31 (Alresford Bypass) access and consequential amendments except for an additional wording under the Access requirement.***

- 32 It is recognised by APG that as a consequence of the changes proposed to make that part of LPP2 regarding Alresford sound that insufficient land is allocated to meet the requirements of LPP1. In order to make good this deficiency it is proposed that there should be two additional policies for sites at The Avenue and Land west of New Farm Road. These sites have been proposed by APG in various submissions, including (507873173). They have also been subject to Sustainability Appraisal by WCC and that has been addressed by APG and subject to another Statement for another session of the hearing. The outline wording to be included as recommended changes to LPP2, subject to the procedures required before they can be brought forward to the Public Examination are thus:

**Land at The Avenue is allocated, as shown on the Policies Map (see Appendix 3), is allocated for c2.2 hectares of residential development (about 65 dwellings). Planning permission will be granted provided that detailed proposals accord with the Development Plan and meet the following specific development requirements:**

**Repeat the normal sub clauses with the additional requirement for 50 -100 public car parking spaces as an extension to the car park at Alresford Recreation Centre**

and

**Land to the west of New Farm Road, as shown on the Policies Map, is allocated for c5 hectares of residential development (about 149 dwellings). Planning permission will be granted provided that detailed proposals accord with the Development Plan and meet the following specific development requirements:**

**Repeat the normal sub clauses with the additional requirement**

## **Appendices**

- 1 APG Vision for Alresford**
- 2 Sun Lane – Housing and Open Space Allocation (NA3 revised)**
- 3 The Avenue – Housing and Public Parking (NA4)**
- 4 New Farm Road – Housing (NA5)**

