A Submission by Kim A Gottlieb (representor no: 52024) For the Winchester Local Plan Part 2 Examination Regarding New Alresford – **Policies NA1-3**

<u>Introduction</u>

This note is supplementary to the representation made by email (only) on 16th December 2015. Although the earlier note was submitted on behalf of the three Winchester City Councillors representing Alresford & Itchen Valley, Cllr Lisa Griffiths, Cllr Ernie Jeffs and myself, this note is presented on my behalf only.

Policy NA1

- 1. I am supportive of this policy and the intention to retain and increase car parking within the town. The provision of car parking is critical to the vitality of the commercial centre, which is itself critical to the preservation of the character of the whole town.
- 2. It must, however, be noted that due to the dependency of the City Council acquiring a site and building a car park, the prospect of the additional provision in The Dean is far from assured. It should also be noted that the City Council has limited control over the future of the station and Perins car parks.

Policy NA2

- 3. I am generally supportive of this policy and the intention to allow a mix of residential and commercial uses. I am, however, concerned that the masterplan identified as necessary to establish principles for the disposition of uses, has been delegated to an applicant for development to produce. For numerous reasons of practicality, not least because adjoining land owners may have conflicting ambitions, the masterplan needed for The Dean should be for the City Council to commission. The policy should be re-worded accordingly.
- 4. If the City Council does not itself determine which sites within the Dean are more suited to residential purposes and which to commercial purposes, there is a real prospect that it will all be converted to the higher land value residential use. Secondary commercial space underpins employment opportunities within the town centre, and no reliance can be placed on any claim that this will, in future, be transferred to existing or proposed commercial use sites elsewhere in town.

Policy NA3

5. I am of the opinion that this policy as is unsound for reasons that are largely access and traffic related.

- 6. It is generally held that the proposed development by Seaward, upon which the proposed policy is based, would not be sustainable or viable without the construction of a new junction on the A31. Even then the proposal is for only a three way junction, with traffic using the A31 coming from the east (ie from Guildford and London) having to journey another mile to turn around at the Alresford Roundabout. A proportion of this traffic will inevitably leave the A31 at the roundabout before, and access Alresford via the Bishops Sutton Road.
- 7. At the time of writing, I am not aware of any detailed design for the construction of the roundabout being completed or made available for public inspection. It is not known, at least to the public, if all the engineering issues indicated in the Systra Report as challenging have actually been resolved, or are capable of being resolved.
- 8. It is said that Hampshire County Council, as the relevant highways authority, has no in-principle objection to the proposal. However, at the time of writing, it is not known if this is just a generalised comment or a consultation observation in response to their in-depth analysis of a detailed design submitted to them.
- 9. There also needs to be clarity about what "in principle" actually means and whether this applies just to design matters, or whether it also refers to broader planning and organizational or logistical, political and all other issues. The junction proposal did not start life as an objective or requirement of the highways authority, and until such time as it can it be confirmed that the juncture can actually be delivered, and that the relevant authority does want to deliver it, the proposed policy which is entirely contingent upon it cannot be regarded as sound.
- 10. In the event that the new junction can and will be delivered, its provision still presents an unsatisfactory outcome.
- 11. To begin, the construction and subsequent use of the slip road serving traffic heading east and exiting the A31 (which will include traffic previously heading west on the A31) will have an intolerable impact on the housing along Tichborne Down and in roads just off it. The new slip road will substantially deplete, if not entirely remove, the forested buffer zone which helps to protect the amenity of a much broader area of housing all to the north of Tichborne Down.
- 12. The cost of the new junction will inevitably have a detrimental impact on the provision of affordable housing, which is a fundamental aspect of the objective to increase the housing supply, particularly in high value locations such as Alresford. No viability appraisal has yet been made public, but a reasonable assessment to make is that the commercial element of the development might make a modest profit, if at all, and that the cost of the new junction will almost entirely impact upon the viability of the residential element. The value of the land itself can bear the burden only so much, and the percentage of affordable housing to be required is bound to be strongly challenged when a planning application is submitted.

- 13. This policy is intended to ensure the bulk (more than 60%) of the provision of additional housing for the whole town for the lifetime of the local plan. If a consequence of the cost of constructing a new road meant that the policy failed to secure the required volume of affordable housing it would have to be regarded as unsound. The Council's affordable housing policies are too important, and the scale of the Sun Lane proposal in proportion to the town too large, for this possibility not to be exhaustively investigated.
- 14. Perhaps more existentially, the new junction would defeat the purpose of the bypass, which would no longer ensure that the town is passed by traffic. Access to the town would no longer be relatively restricted to via the B3047. The residential enclave of the south of New Alresford would be made much more accessible to traffic, and it would no longer be an enclave.
- 15. Such impacts as there would certainly be, particularly on Sun Lane, Jacklyns Lane, Tichborne Down and Whitehill Lane have not been adequately assessed and they are, to a large extent, unpredictable. These roads were not designed to cope with the volumes of traffic that could potentially arise from both the residential and commercial parts of the development. The law of unexpected consequences is bound to come into play, with such things as the new junction perceived as a convenient point of access to the A31 for commercial traffic heading south from Basingstoke along the B3046.
- 16. Even if built, the new junction will not obviate the stresses caused by the volume of traffic likely to be generated by 325 new dwelling at the northern end of site, which will attempt to access East Street via its junction with Sun Lane. When that becomes difficult, as it will do very easily, additional traffic will pass along Nursery Road and look to access East Street via Jacklyns Lane. Roads such as Nursery Road were not designed to cope with a materially larger volume of traffic than is presently the case, and the amenity and safety of current residents will be severely compromised.
- 17. A separate concern, which I accept may not be for this Examination to consider, is that the creation of a junction at this point on the A31 will make a very much larger area of land to the east of the site capable of being developed. To a developer or master planner the whole triangle of land before Bishop's Sutton, bounded by Sun Lane, Whitehill Lane and the B3047, would appear as a logical place to position a significant volume of development. The potential doubling of the size of Alresford may not be an immediate concern to this Examination, but the new road juncture which will facilitate that possibility, clearly is a concern.
- 18. Reinforcing the view that the current proposal is unsound is the availability of a viable alternative to provide the required volume of new housing. I am persuaded that up to 100 dwellings at the northern end of Sun Lane would be tolerable and sustainable whilst, incidentally, providing some compensation to the landowner for the absence of the larger current proposal. As the APG proposal suggests, a sizeable volume of housing on New Farm Road is feasible and would not cause the same degree of impacts. The junction of New Farm Road and the Avenue, which a new

development would use, is far more accommodating than the Sun Lane/East Street junction, and it would work far more efficiently. The current proposal by Alfred Homes, for a development at Arlebury Park, appears to be both viable and acceptable. I am particularly attracted by the prospect of the additional public car parking it would provide. The idea of a public car park being built here is far more realistic than the Council buying a site and building one in the Dean.

- 19. Inevitably, over the course of the remaining 15 years of the plan, other smaller sites will emerge that will ensure that the overall housing requirement is delivered in a far more organic and sensitive way.
- 20. In addition, I am not convinced that there is any particular necessity to locate new commercial premises at the southern end of Sun Lane, or any need to create a new road junction to service it. There is sufficient commercial accommodation at Prospect Road, the Dean and elsewhere, to provide for local demand and which will be refurbished or rebuilt as market forces naturally dictate. Furthermore, in the section on development phasing the requirement is only that the land for business use to be made "available" before the completion of the housing development. Building new commercial premises in such location is very marginal from a viability perspective. There is a risk that the business land will not ultimately be used as such, and that attempts will be made to use it for additional housing whilst, in the meantime, business uses elsewhere will have been denuded.

Conclusions

- 21. Policies NA1 and NA2 are supported, although as indicated NA2 requires some rewording so that it is the City Council that commissions a master plan.
- 22. Policy NA3 is regarded as unsound because;
 - The traffic impacts likely to occur are unsustainable and would harm the amenity and safety of a large number of existing residents.
 - The deliverability of the proposed new road junction, which is critical to this policy, is uncertain.
 - The new road junction would defeat the basic purpose of the bypass, and generate traffic access in residential streets not intended to accommodate it.
 - The particularly restrictive characteristics of the Sun Lane/East Street junction will inevitably generate 'rat runs' through other parts of the local roads network.
 - The policy relates to a significant proportion of the affordable housing requirement of the town, and there is a real risk that it will not be delivered.
 - There is a viable alternative plan to deliver the housing numbers required in a more sustainable and sensitive way.

By way of background I would add that I became a member of the Royal Institution of Chartered Surveyors in 1983, and have been involved in commercial and residential property development, both as an advisor and as a principal, throughout my professional career. I became a Winchester City Councillor in May 2011 representing the ward of Itchen Valley and, in May 2016, was elected as one of three councillors for the newly formed ward of Alresford and Itchen Valley.

Kim A Gottlieb (Representor no: 52024) 21st June 2016