



**WINCHESTER DISTRICT LOCAL PLAN PART 1 – JOINT CORE
STRATEGY**

RESPONSE TO THE SCHEDULE OF PROPOSED MODIFICATIONS

JUNE 2012

1.0 INTRODUCTION

- 1.1 This response has been prepared on behalf of Bewley Homes Ltd.
- 1.2 It is evident that the failure to address the implications of the National Planning Policy Framework makes the Local Plan unsound. The presumption in favour of sustainable development has created conflict between the Policy MTRA2 and this presumption. The policy, in its current form, has created and exaggerated an unnecessary tension between local residents and the promoters of development. Instead of an objective analysis of the costs and benefits of even the most sustainable development there is a battle between the local residents seeking to minimise development and the promoters seeking development.
- 1.3 This can be seen in response to a recent workshop in Wickham attended by over 70 local residents. The workshop identified very strong public concern with regard to localised flooding and sewage overflows near the bridge on Bridge Street (and off-site). Every attendee was invited to complete a feedback form.
- 1.4 Only a few feedback forms were received but the analysis confirmed universal concern with regard to drainage. However, in answer to the question “would you support more housing to fund the necessary works – the answer was No! Thus, demonstrating the fickleness of the residents. Perhaps the missing or further question should have asked? “Or would you prefer to pay £1000 per household to fund the works?” This may leave concentrated minds!
- 1.5 The capacity of the Market Towns and Rural Villages, especially within the PUSH part of the District should be assessed in accordance with the requirements of the NPPF. These are some of the most sustainable locations for development and development should not be restricted on the basis of “Nimbyism”.

2.0 THE MODIFICATIONS

2.1 The comments upon the Modifications are made in accordance with the reference numbers in the Schedule.

Modification 18 (Mods: page 7) new paragraph

2.2 The recognition of the positive approach to development as set out in the National Planning Policy Framework is welcomed. The paragraph states that “the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework”. However, this is the only recognition of the NPPF.

2.3 The Council has failed to reflect the provisions of the NPPF in other parts of the Plan, notably the Market Towns and Rural Area. The proposed policies are restrictive and limiting policies especially with regard to the Market Towns and Villages in the PUSH area of the District. (MTRA2)

2.4 Some of the Market Towns and Villages in the PUSH area are clearly very sustainable locations. This is acknowledged in the Background Paper-1 Housing Provision, Distribution and Delivery (paragraph 5.42) which states that these settlements “currently benefit from reasonable levels of service provision such as schools, shops, pubs and community facilities”.

2.5 It is evident that the presumption in favour of sustainable development should be applied to appropriate sites within the settlements covered by MTRA2 within the PUSH area. This also means that the figure of 11,000 for the Districts is no longer objective in the context of the NPPF. The figure should be increased to facilitate more development within the Market Towns and Rural Areas. It is also evident that the proposed range is irrelevant as some settlements could accommodate more than 250 dwellings (Wickham and Denmead) whereas others may not be capable accommodating much more than 150 (ie

Swanmore) and even Bishops Waltham may have to breach landscape impacts to achieve 500 units.

Modification 23 (Mods:page 11) new paragraphs

- 2.6 The Council states that “it supports the updated PUSH economic development strategy and proposes to play its part in meeting this through the provision of housing (5,500 dwellings).” However, the spatial area that it identifies known as the South Hampshire Urban Areas (SHUA) relies exclusively upon two Strategic Development Areas, namely, West of Waterlooville and Whiteley.
- 2.7 The Market Towns and Rural Area is described as “50 or so smaller settlements, which range from larger villages to small hamlets”. This area should be divided into the two policy areas of MTRA2 and MTRA3 which reflect their differing natures. The Market Towns and the larger villages of MTRA2, especially those in the PUSH area, should be treated separately to recognise the important contribution that they can make to provide adequate housing to meet the wider requirement of PUSH. These settlements should be distinguished from the much smaller settlements in the area of the South Hampshire National Park.
- 2.8 The restrictive approach set out in paragraph 50 is clearly in conflict with the statement in the following paragraph on page 12 that states “this spatial approachallows...the Plan...to fully explore the potential that these different parts of the District can offer in terms of growth, sustainable development and diversity.”
- 2.9 This policy ‘to explore the potential of parts of the District’ is limited to the three Strategic Development Areas of Barton Farm, West of Waterlooville and Whiteley. There are many other settlements in the remainder of the District which have potential and offer opportunities for growth, sustainable and diversity.

Modification 27 (Mods page 13) new paragraphs

- 2.10 It is noted that Wickham is now recognised as a District Centre within the Retail Hierarchy and this reflects the need to be compliant with the NPPF. This status should be reflected in the policy in relation to Market Towns and Rural Area. (MTRA2)
- 2.11 It is evident that Wickham serves a very wide rural catchment area where development is very restricted. The area to the north of Wickham now lies within the National Park. Wickham can provide both market and affordable housing to serve this rural area which lies mainly within the South Downs National Park. Its overall status should reflect this and not simply its retail significance.

Modification 46 (Mods page 26) new paragraphs

- 2.12 The new paragraphs inserted with to clarify the delivery of Barton Farm (Policy WT2) sets out the position if the trajectory fails. It states that “development of the site will be monitored to ensure the proposed development and required infrastructure is provided in accordance with the trajectory and policy requirements.”
- 2.13 It then states that “if at some point in the future it becomes clear that the site is failing to deliver the level of housing proposed, the implications for the Council’s ability to ensure adequate housing land supply across the District will be assessed. It may be that other sources of supply can maintain adequate housing provision or it may also be necessary to bring forward additional sites for housing purposes in accordance with the development strategy established in this Plan.” It should be made clear that the Market Town and Villages in the PUSH part of the policy area MTRA2 could fulfil this role and this should form part of the development strategy.

Modification 49 (Mods page 29) new paragraphs

- 2.14 The new paragraph refers to the development strategy which focuses on the SDA's. This strategy should be reviewed in the context of the NPPF with which it is clearly in conflict. It is evident that the Market Towns and Villages in the PUSH part of the policy area MTRA2 are the most sustainable locations for new development. They enjoy the benefit of a very wide range of existing facilities which should be exploited especially in the early stages of the Plan.

Modification 58 (Mods page 34) new paragraphs

- 2.15 This is evident from the requirements set out in the paragraph 58 that refers to Whiteley where two primary schools and a secondary school are proposed. The secondary school is unlikely to be provided until the latter part of the plan period, if at all, and the primary schools have to await the development of sufficient housing to justify their provision. This has led to serious social and educational issues as there is an inevitable lag between the housing development and the provision of facilities. On the other hand, the Market Towns and Rural Villages in PUSH area (MTRA2) all have existing primary schools and are served by an existing secondary school in Swanmore.

Modification 50/55 (Mods pages 30 and 33)

- 2.16 There are conflicting figures for the MDA at West of Waterlooville. Paragraph 50 (page 30) refers to 2500 new dwellings in the Winchester District while Paragraph 55 (page 33) 2350. This requires clarification in accordance with paragraph 6.35 of the Background Paper-1.

Modification 60 (Mods page 40) new paragraphs

- 2.17 This Modification repeats the point in respect of the housing trajectory set out in Modification 46. Modification 60 also states that "It may be that other sources of supply can maintain adequate housing provision or it may also be necessary to bring forward additional sites for

housing purposes in accordance with the development strategy established in this Plan.” It should be made clear again that the Market Town and Villages in the PUSH part of the policy area MTRA2 could fulfil this role and this should form part of the development strategy.

Modification 68 (Mods page 44) new paragraphs

- 2.18 It is noted, again, that Wickham is a District Centre and that it could provide additional retail and leisure floorspace. It is evident that Wickham could also support a larger level of housing growth to reflect this status. The housing proposals for Wickham should not be restricted to the range 150 to 250. It would be appropriate to provide a figure between 250 and the 400-500 dwellings proposed for Bishops Waltham and the other villages in PUSH. .

Modification 71 (Mods page 45/46) new paragraphs

- 2.19 The new paragraph is meaningless. The conjunction of the issue of ‘an ageing population’ and the fact that they have “an attractive setting with a school’ that is ‘popular with in migrants’ makes little sense.
- 2.20 The issue of an ageing population should be addressed by the provision of suitable accommodation to meet the needs of the ever increasing elderly population. It is evident that all of the settlements should be providing accommodation for the elderly population including sheltered housing and care homes etc, in addition to market housing and affordable housing.
- 2.21 The fact that these settlements have “an attractive setting with a school’ that is ‘popular with in migrants’ should be exploited to provide choice. There is a failure to recognise the importance of choice in the provision of new housing which should not be restricted to West of Waterlooville and Whiteley.

- 2.22 It is recommended that the wording of the paragraph is amended to reflect the above points. The addition of the words “*local housing*” is irrelevant in this context and should be deleted.

Modification 142 (Mods page 71) new paragraphs

- 2.23 This Modification refers to the trajectory and it repeats the points in set out in Modification 46 and Modification 60.

RESPONSE PREPARED BY BRYAN JEZEPH CONSULTANCY LTD