



Twyford Parish Council6

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

Winchester District Local Plan part 1 – Joint Core Strategy.
Additional representation 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 the comments.

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

I will comment on each of TPC's objections as appropriate where the additional information or changed or new policy justifies it. There are some corrections of the submitted objections. In particular we restate the Parish Council's 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 sorry 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None of TPC's objections are withdrawn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 the carrying forward of the settlement boundary.

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.

The NPPF the NPPF gives additional reasons why this policy should be reviewed; and these are based on the Para's 183-185.

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 in Twyford in particular does not usually 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 how can development in South Downs villages 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. However. Similar considerations apply to the contribution of economy of National Parks. 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 have 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 be 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.

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 Parish's 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.

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 and give evidence.

MTRA 4 and 5 – Economic Development in the Countryside on small and large sites.

TPC's objection to these two policies as with MTRA3 is their failure to distinguish between SDNP and other parts of the District. They appear to override most other considerations. However NPPF, 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; the plan cannot be sound without it. It would cover both the protection of natural beauty and the economic and social interests of the local community which are to be distinguished from any district wide needs.

The matter is of particular importance within Twyford which has, straddling its settlement boundary but largely in the countryside, a major commercial complex with multiple uses and scope for expansion. No adjustment of the settlement boundary is proposed by the WDLP.

It is a dominant use within the village but in MTRA3 policy outside it. This policy would commit the Neighbourhood Plan to accept additional development on this site. The extent of development which might fall within the scope of this policy is not defined, - again a fundamental defect within a National Park and, probably, NPPF Para xxxx which could well affect the character and amenities of the village further.

The relationship of this site to the Neighbourhood Plan is yet to be established.

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

Answers to Questions (only where changed)

MTRA 4

Q 4 (legally sound): NO

Q5 (Justified): NO

(Consistent with national Policy): NO

Q6 (Change to plan): policy not to be applied within SDNP; replace with bespoke policy for SDNP.

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

MTRA 5

Q4: NO

Q5: Justified: NO

Consistent with national policy: NO

Q6; as above

Note that in line 1 of objection “with “should read “without”

Q7: as for MTRA4

Q 8: (appearance) Twyford Parish Council wish to appear and give evidence.

Regards

Chris Corcoran

For an behalf of Twyford Parish Council