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ISSUE 8

Issue i) Policies justified by NPPF, impacts, clear & deliverable?

MTRA1 incorporates my suggested amendments. This and the supporting text is welcomed. Policy seeks to avoid adverse social impacts and is clear.

Deliverability of policy for older, restricted mobility and persons with support needs is dependent on good non-car access to town centre services. This is unlikely to be achieved without JCS Part II site allocations for this purpose.

MTRA1 and MTRA2 not consistent with NPPF 17 *actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.*

- No advantage is taken of the sustainable transport infrastructure already available in the M3 and M27 corridors;
- nor account taken of the differences in climate impacts due to greenhouse gases and emissions because of public transport provision levels;
- No strategy to minimise journey lengths (NPPF37) by location of new development relative to the nearest main employment, higher education, service and shopping centres of Winchester, Eastleigh, Southampton, Fareham, Havant and Portsmouth;
- Similarly the very limited range of job skills and levels available locally compared to these main centres forcing high levels of out-commuting and the low rural population density forcing longer distance in-commuting;
- Communities near these main centres also benefit from more frequent bus services as routes converge approaching the main centres, shorter journeys and availability of bus only lanes;
- Hence the travel related sustainability of Alresford, Denmead, Wickham and smaller settlements such as Kings Worthy, Littleton, Otterbourne and Colden Common is much higher than Bishops Waltham (with town centre services and facilities) and Swanmore (with secondary school and sports hall) that are at a greater distance from all of the main centres;
- The provision of shops, surgery, primary school etc are a good measure of the capacity to ensure health and social well-being (NPPF17) but not of climate change impact.

It is suggested all groups and individual settlements should have a minimum allocation based on local need. There is nothing in the evidence base defining this need at this level. Further allocations should be made to those that have the existing capacity to ensure health and social well being or where it is feasible and advantageous from a sustainability point of view to enhance it to this level. To cater for a wide range of community sizes allocations should be determined as a % increase in number of existing dwellings. Apply the % increase in 3 bands of travel sustainability determined by journey length to the nearest 3 of the above 6 district / regional centres.

MTRA3 (p79). Controlled in-fill where no policy boundaries, and thus outside all policy boundaries, is not contrary to NPPF. There is thus no reason why this should not also apply to the settlements with boundaries in MTRA 2 and thus in locations that are more sustainable than where MTRA3 permits it. Add this policy to MTRA 2.

MTRA4 (p80). "Land outside built up areas of" treats allocated sites and parts of sites outside existing settlements until such time as development commences as countryside. Amend to read "*countryside defined as outside existing settlement boundaries and sites allocated or reserved for development*".

MTRA5 (p81) "supports major commercial and educational institutions in the countryside because of their contribution to economic prosperity". This discrimination against non-major contributors is contrary NPPF 28 *support the sustainable growth and expansion of all types of business and enterprise in rural areas and what does "support" mean if the operation is closed down and re-use has to be considered?*

Delete MTRA5 and replace by "*The Local Planning Authority will support the retention, sustainable development and expansion of enterprises in the countryside where this will help them continue to commensurately contribute to the District's economic prosperity.*"

Issue ii) Clear & deliverable infrastructure?

MTRA1 supporting text justifies the flexibility in infrastructure provision required to address small and large scale developments.

Issue iii) Categorisation of settlements clear & appropriate?

My comments on DS1 are:

MT spatial definitions should EITHER be MT only ; sustainably linked to the MT hub; truly Rural Area (RA)

OR MT and sustainably linked to MT hub; truly RA.

See also Issue iv) below.

MTRA2 reference to "IN" settlements is misleading by suggesting within settlement boundaries. Amend to read "in and adjoining" as in WT1 and consistent with MTRA2 penultimate paragraph.

Issue iv) Should network & hierarchy of centres be defined?

Yes. The Market Towns and those MTRA2 settlements and MTRA3 communities within sustainable travel distance thus forming a hub should be defined. MTRA2 Housing allocations should then be to the group as a whole.

Similarly MTRA3 small communities within sustainable travel distance of each other should be treated as one in identifying local housing and employment needs and solutions (NPPF55).