

Market Towns and Rural Areas – Policies MTRA1-5

Issue 8

(i) Are the policies and proposals for growth and change in these areas appropriate and justified, including in relation to the NPPF, and in terms of environmental, economic and social impact; are they clear and deliverable?

Executive Summary

- 1) The development strategy applying to the market towns and rural areas as framed by policies MTRA1 and MTRA2 is not justified having regard to the provisions of the NPPF and the Council's own evidence base. It does not provide sufficient certainty and is not clear and deliverable within the framework of this plan. There are no identified housing allocations and there is no clear settlement hierarchy. The expression 'local housing' needs is not clearly defined and is misleading in its intent. The evidence base supporting the Local Plan Part 1 is clear that demand for housing within the District is driven to a large extent by in-migration; it cannot therefore be reasonable to restrict housing development within the MTRA policy area to that arising as a consequence of 'local needs' as the strategy implies.
- 2) The Local Plan Part 1 is not sufficiently positive in its intent regarding housing allocations and defers key decisions on site allocations within this policy area to the Local Plan Part 2, which is not timetabled for adoption until May 2015; a full two years and two months after this Plan is scheduled for adoption.

Housing Strategy

- 3) The NPPF requires that policies in Local Plans should make clear that sustainable development can be approved without delay (para.15); and that Plans should provide clear policies on how the presumption in favour of

sustainable development will be applied locally (para.15). There is also a requirement for neighbourhoods to plan positively to support local development (para.16); with an evidence base prepared to support policies which ensure that the full, objectively assessed needs for market and affordable housing are met within the housing market area (para.47). Key sites critical to the delivery of housing should be identified (para.47); and Local Plans should plan positively for development, allocating sites to promote development; bringing forward new land where necessary (para.157). There is no restriction explicit or implied that housing supply should be limited to meeting local needs only. Indeed para.159 of the NPPF makes clear that local authorities should have a clear understanding of the full range of housing needs in their area and should prepare a SHMA that takes into account household and population projections, migration and demographic change. The SHMA should also take into account housing demand and describe the scale of supply necessary to meet that demand. As highlighted above, the NPPF requires that to boost the supply of housing significantly Local Plans should meet the full objectively assessed housing needs within the HMA, consistent with the presumption in favour of sustainable development (para.47).

- 4) The Vision (para.3.82) emphasises meeting local needs only and in this respect reference is made to the evidence base, notably BP1 – *Housing Provision, Distribution and Delivery* (June 2012). Paragraph 5.12 states:

“In terms of meeting local housing needs there is no reason why housing provision needs to be spread evenly across the District. The District housing requirement is made up largely from housing required to accommodate in-migration rather than the ‘indigenous’ needs of the District.....”

Paragraph 5.13 goes on to state:

“Accordingly there is considerable scope for planning policy and allocations to influence where in the District in-migration is directed. The aim of the Local Plan is to direct development....to sustainable locations.”

- 5) While these paragraphs fall under the ‘South Hampshire Urban Areas’ sub-heading, there is no reason in principle why this should not be applied as a determinant for policy across the whole of the District, given that demand arising from in-migration is a large component of locally-arising housing needs. If this provision is applied equally and evenly to the District as a whole the basis for the MTRA policies could be made sound.
- 6) Given that the 1,500 dwelling requirement for MTRA is a residual figure and acknowledging that the key hubs/principal settlements have the potential to accommodate significant change, there is no clear justification supported by evidence, for the Council to conclude there is no basis for increasing housing numbers at these settlements. The only strategy that appears to have been applied is a general distribution of the figure across the range of settlements according to their general ‘sustainability’ credentials. It is not apparent that there has been any objective assessment of the capacity of settlements to absorb growth sustainably; the policy approach within the Local Plan Part 1 is to leave the allocation of land for development within the MTRA settlements to Local Plan Part 2.
- 7) Given the fact that there appears to be no firm evidential link between locally-arising housing needs and the residual figure set for the MTRA policy area as a whole, the distribution of housing, as currently expressed in the plan, appears arbitrary.
- 8) The text explaining the Spatial Strategy for the MTRA policy area and the Vision that defines it focuses on serving ‘local needs’ in the most accessible and sustainable locations. This appears somewhat misleading having regard

to the Council's own evidence, which acknowledges that the MTRA housing target is a 'top-down' figure generated as a residual component of an overall figure for the District.

- 9) It is also not consistent with the evidence base, or with the supporting text (para.3.87), which acknowledges the attractiveness of certain settlements to 'in-migrants'. It also fails to recognise the potential of the principal (key hub) settlements to accommodate significant change.
- 10) The soundness of the Plan would be improved if there was a greater level of certainty attached to the spatial strategy.

Settlement Hierarchy

- 11) Within BP1, under the 'Market Towns and Rural Areas' (MTRA) sub-heading, there is an inconsistent message, borne out of the grouping of settlements within this policy area, which makes no separate policy distinction between the larger market towns and the smaller less sustainable settlements. The text at para.5.41 of BP1 states that the needs of individual settlements are 'relatively modest' and that the MTRA settlements are 'not the most sustainable locations', hence there is no justification for the 'top-down' requirement of 1,500 dwellings to be increased.
- 12) While the MTRA settlements, when considered collectively, may not be the 'most sustainable' locations in the District, this is a relative term and is not a suitable basis for defining a settlement strategy. This generalised description of their overall sustainability merits may apply, arguably, if all of the settlements are grouped together, as is currently the case. However, the principal settlements of Bishops Waltham and New Alresford are accepted as more sustainable locations, and the text continues at para.5.42 to recognise that low levels of housing development would result in ageing populations and

population decline, which would be particularly problematic for these larger settlements; which have been formerly identified as 'Key Hubs' capable of accommodating significant change (Winchester Core Strategy Issues and Options – December 2007).

- 13) It is stated in BP1 that Bishops Waltham and New Alresford benefit from 'reasonable' levels of service provision and that 'Blueprint' and 'Plans for Places' indicated widespread acceptance of the need for more development in these locations.
- 14) However, the description 'reasonable', regarding levels of service provision, appears out of step with the assessment of Key Hubs within the Issues and Options Document, wherein Bishops Waltham, New Alresford, Wickham and Whiteley were characterised as having:
 - Good choice of shops offering a wide range of goods and services;
 - Primary school provision;
 - Local health facilities – GP, dentist, pharmacies;
 - Range of retail, office, commercial and industrial employment;
 - Various community and cultural facilities; and
 - Good public transport service.
- 15) Critically, as set out above, these were settlements deemed capable of supporting significant change as a focus for surrounding lower-order settlements when the strategy for development in the MTRA was consulted on at Issues and Options stage.

- 16) While paragraph 5.43 of BP1 highlights that the dwelling targets specified for Bishops Waltham and New Alresford are the result of a series of exercises designed to achieve an appropriate settlement hierarchy for the MTRA there is no distinction, in terms of a specific policy designation, that sets these two principal settlements/key hubs apart from the remaining lower order settlements. Consequently the spatial strategy does not deliver a clear hierarchy or firm differentiation between the settlements of Bishops Waltham and New Alresford and the other less sustainable lower-order settlements, to which a lower housing target is applied.
- 17) Furthermore, the repeated use of the term 'local-needs', applied uniformly across the MTRA, implies a housing target devised only to meet needs that arise directly from within each particular settlement. While such an approach may be appropriate for certain settlements within the MTRA, it clearly is not relevant to the principal settlements of Bishops Waltham and New Alresford, which currently are assigned a range of 400-500 dwellings each. This figure necessarily would make provision for 'in-migrants' and for new population to arrest population decline and an ageing population structure, as recognised at paragraph 3.87.
- 18) It would therefore be sensible to separate Bishops Waltham and New Alresford from the other lower-order settlements. The text preceding Policy MTRA1 (paras 3.79-3.88) should be redrafted to define a strategy consisting of a clear hierarchy of settlements, with Bishops Waltham and New Alresford identified specifically as the principal settlements within the MTRA policy area, with their own policy. It should be made clear that these settlements have been identified because of their role and function as key service centres that serve a wider hinterland and their capacity to deliver growth in a sustainable manner, in accordance with the objectives of the NPPF. As a consequence a positive policy decision has been taken to direct development

to the two settlements to meet local and wider housing and development needs.

- 19) On this basis the Local Plan Part 1 should make positive provision for housing allocations at the two principal settlements, as these would be key to achieving the overall housing strategy of the Plan (NPPF para.47).
- 20) Paragraph 3.91 of the Local Plan Part 1 is currently expressed too vaguely and ambiguously; by applying its terms to all of the settlements, without distinction, there is a lack of certainty and positivity, which does not coincide with NPPF objectives.
- 21) The settlement hierarchy should comprise the two key service centres (primary settlements); the six second tier settlements and the remaining tertiary settlements. In accordance with this strategy, and taking into account the residual nature of the MTRA housing requirement, the primary settlements should receive new dwelling allocations of up to 750 dwellings each to accommodate the whole of the housing requirement assigned to the MTRA. This would be an appropriate response reflecting their wider service role and ability to accommodate development sustainably. It would also provide certainty that Local Plan Part 1 has made positive provision for the whole of the District housing requirement within identified settlements. The six secondary settlements could then be allocated up to 100 dwellings each, to be delivered through Neighbourhood Planning, or allocations within Local Plan Part 2, based on identified local needs and community support.

Housing Allocations

- 22) Paragraph 3.89 of Local Plan Part 1 states that the objectives of the MTRA policies will be delivered through a combination of proposals coming forward via the 'development management process' – for this read unallocated sites

within development boundaries; and through the allocation of sites via Local Plan Part 2 and potential Neighbourhood Plans. This provides very little certainty at this stage that the objectives of the policies will be met or that housing will be delivered within the settlements.

- 23) As currently drafted there is insufficient certainty attaching to Policy MTRA2 for its provisions to be deliverable. Bishops Waltham and New Alresford are each assigned up to 500 new dwellings, which is a potentially significant quantum of development relative to existing settlement size. However in neither case is there any commitment to allocate sites for development within this Plan, or to commit to allocate greenfield land outside the existing settlement boundaries. The Policy implies that greenfield land will be released only if, following an assessment of capacity within the existing urban envelope, there is shown to be insufficient land to accommodate the prescribed level of housing. In each case the Council's SHLAA, prepared to support the Local Plan Part 1 (November 2011) identifies capacity for only 55 dwellings in Bishops Waltham and 44 dwellings in New Alresford. It is therefore self-evident that there will not be sufficient capacity to deliver the quantum of development assigned to each without greenfield releases. Failure to acknowledge and make provision for this within the Policy renders the Plan unsound.
- 24) This view is confirmed by the acknowledgement at paragraph 3.99 of the supporting text that the Policy will be delivered through a combination of previously-developed land and other opportunities within the built-up area and planned greenfield releases. If this is accepted by the Council the Local Plan Part 1 should now be making explicit that there is a policy undertaking to allocate greenfield sites. To suggest a form of sequential assessment and a subsequent test before greenfield land can be 'released' is both disingenuous and contrary to the provisions of the NPPF (para.17 – Core Planning

Principles). While the NPPF encourages effective use of previously-developed land and suggests that allocations should 'prefer' allocations of lower environmental value, where consistent with the presumption in favour of sustainable development, there is no suggestion that a sequential test should be applied.

- 25) To ensure there are clear and deliverable housing Policies for the whole of the District policy MTRA2 should be framed positively and should commit to allocating greenfield land outside the existing settlement boundaries of Bishops Waltham and New Alresford. The commitment should make clear that the Policy will allocate land sufficient to accommodate the full residual housing requirement for the District assigned to the MTRA across these two settlements.
- 26) As drafted the Plan makes no commitment to allocate land and therefore is insufficiently positive in its intent; it fails to indicate broad locations or specific allocations within or adjoining either of the principal settlements (NPPF – para.157); and fails to set out clear enough strategic priorities for the MTRA which will deliver the homes and jobs needed in the area (NPPF para.156).

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(ii) Are they clear and deliverable, including in respect of the associated infrastructure requirements?

- 1) The Policies (MTRA 1 and 2) lack any clarity regarding infrastructure requirements because there is insufficient prescription regarding where and how development is to be delivered within the MTRA settlements.
- 2) With respect to the deliverability of the Policy there is a distinct lack of certainty due to the failure to identify sites that are capable of delivering the quantum of development assigned to the MTRA settlements. This is confirmed by evidence in the SHLAA (November 2011), which identifies capacity for only 55 dwellings on land within the existing built-up area of Bishops Waltham, upon which the strategy purports to rely in the short to medium-term for the delivery of housing. The NPPF is clear (para.159) that in order to have a clear understanding of housing needs and prospects for delivery, local planning authorities should prepare a SHLAA that provides realistic assumptions about the availability, suitability and viability of land within the area to meet identified needs. While the Council has carried out this exercise, its findings do not support the contention within paragraph 3.98 that sufficient land is available to meet short to medium-term delivery requirements within the existing built up areas of the MTRA settlements.
- 3) In the case of the principal settlements of Bishops Waltham and New Alresford there is an undertaking to deliver up to 500 new dwellings in each settlement, which is not an insignificant quantum of development relative to the size of each settlement. While there is every prospect that such a quantum (and more) could be delivered in a sustainable manner, given the existing and planned level of jobs, services and facilities, the approach within

the Policy is to indicate that no strategic infrastructure is required to facilitate development.

- 4) With regard to clarity and deliverability, without any undertaking to identify sites, or indeed broad locations for development, in the principal settlements, the policy provides no certainty as to deliverability. It is unsound to rely on a subsequent Local Plan document to allocate land for development, where that development is critical to meeting the overall housing requirement for the District. An approach that seeks to defer decisions on levels of additional housing that could be delivered through neighbourhood planning is sound and pragmatic. However deferring decisions on baseline housing allocations required to meet objectively assessed needs to another document, which is unlikely to be adopted for a number of years is entirely out of step with the spirit and objectives of the NPPF.
- 5) As drafted there is an unacceptable lack of clarity regarding housing delivery within the MTRA policy area.

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(iii) Is the categorisation of settlements suitable and appropriate and, if not what should be changed and why?

- 1) As set out above in response to matter (i) the current categorisation of settlements is neither suitable nor appropriate given the evidence base that supports the Local Plan Part 1. It recognises quite clearly the primacy of Bishops Waltham, as the largest and most sustainable location for development within MTRA, and the role of New Alresford as the largest MTRA settlement in the north of the District.
- 2) Bishops Waltham and New Alresford should be categorised separately from all of the other MTRA settlements and should be assigned their own Policy, which makes clear that they are sustainable key hubs wherein development to meet local and wider needs can be accommodated.
- 3) Accordingly the Local Plan Part 1 should undertake to assign the whole of the MTRA housing requirement between these two settlements and should identify specific sites and broad locations for development within and beyond the existing built up area to facilitate the delivery of housing. Decisions regarding the location and quantum of housing to be delivered within these principal settlements should not be deferred to a later stage in the plan-making process.
- 4) The remaining lower tier settlements could then be grouped together with the facility to deliver up to 100 dwellings within each settlement via Neighbourhood Plans or through the subsequent site allocations process, as a means of supplementing the baseline housing provision for the District. In this way the Local Plan Part 1 would provide certainty as to allocations within

Winchester Town, the South Hampshire Urban Area and the Market Towns and Rural Area. Smaller settlements could then resolve, in response to local needs and support from within the community, to deliver additional housing above and beyond the strategic level of provision set out in the Local Plan Part 1.

- 5) This approach to defining a housing strategy for the District would provide certainty in respect of allocations and signal the opportunity for smaller settlements/communities to deliver housing consistent with the presumption in favour of sustainable development in response to local needs and demand.