

DAY 5: WINCHESTER LOCAL PLAN PART 1

MARKET TOWNS AND RURAL VILLAGES – Policies MTRA 1-5

REPRESENTATION REFERENCE NUMBERS: 30102, 30107, 30103

1.0 INTRODUCTION

1.1 I wish to make the following principal points in respect of Policy MTRA2:-

- a) It is evident that the range of 150-250 for the settlements identified in Policy MTRA2 is contrary to the guidance in the NPPF. The range of 150-250 should simply be a guide while the upper limit should be raised to at least 300 for both Wickham and Denmead are now recognised as District Centres. These settlements are sustainable and are known to have capacity to provide more development without breaching any relevant constraints;
- b) The MTRA2 settlements in the PUSH part of Winchester District should be separated from the other areas especially those in the National Park. These MTRA2 settlements lie within the PUSH growth area and can support any deficiencies in the housing supply in the part of the PUSH sub region PUSH within Winchester District;
- c) The Plan has recognised that the Strategic Development Areas of Barton Farm, but, particularly, West of Waterlooville and Whiteley could fail to achieve their respective housing development trajectories. The trajectories indicated that a maximum of 299 and 300 dwellings per annum could be anticipated in West of Waterlooville (para. 3.61) and Whiteley (para. 3.72) respectively. This is a very ambitious target which the Council recognises may fail. The JCS states that, in this eventuality, other sites will be found. The MTRA2 settlements in the PUSH part of the District are ideally placed to make good any shortfalls.
- d) The South Hampshire Strategy has been published by PUSH (October 2012). It has reduced the figure of 10,000 dwellings proposed in the SEP for the



North of Fareham SDA to 5400 in the period 2016-2026. This will require the SDA to achieve the annual target of 540 dwellings per annum. There is a Duty to Cooperate which should be applied in the (certain) event that the North of Fareham SDA fails to achieve its annual target. Some of the shortfall could be made good in the MTRA2 settlements. 299 nor 300 let alone 540 completions per annum have been achieved in the past. These figures that greatly exceed the highest annual total achieved in South Hampshire in the boom years of the 1980's of 280 units in the Hedge End MDA.

- e) The development in the MTRA2 settlements in the PUSH part of the District should not be held back if there are identifiable shortfalls in the five year supply. The release of development sites should not have to await the outcome of the Local Plan Part 2 or neighbourhood plans. Both the Local Plan Part 2 and the Neighbourhood Plans must comply with the policies of the Local Plan Part 1. The Council has advised that:-

“All Neighbourhood Plans must be produced in line with national planning policy guidance and locally produced planning policies ([Winchester Local Plan 2006](#) and the emerging [Winchester District Local Plan Part 1](#)) and other relevant legislation.”

- f) The only outstanding consideration will be the selection of sites. Most of the PUSH settlements have been the subject of previous consultations and decisions have already been made on priorities and the preferred sites ie in Bishops Waltham, Swanmore and Wickham.
- g) Furthermore, housing development should be front loaded to make good obvious shortfalls and for the benefit of boosting the economy in the recession which is prime objective of the Coalition Government.

1.3 I now turn to address specifically the Issues raised:-

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 ?**

- 2.1 The Market Towns and Level 2 Villages are exceptionally sustainable offering a wide range of shops, services and facilities. Most of these settlements could accommodate more development beneficially which would ensure the future of these facilities and provide an attractive and sustainable alternative to the growth areas. These settlements “currently benefit from reasonable levels of service provision such as schools, shops, pubs and community facilities”.
- 2.2 It is evident that the judgement in the context of the NPPF should be sustainability. There is a presumption in favour of development. There has been an inadequate assessment of capacity nor any attempt to optimise local services.

Range 150 - 250

- 2.3 The blanket proposal for about 150-250 dwellings in each settlement is unrelated to the assessment of their capacity in terms of sustainability. Some settlements can accommodate more development because there are fewer impediments to developments such as flood risk, environmental considerations (SINCs, SSSIs etc). This figure should be a guide as more development may be appropriate depending on the sustainability and deliverability of the potential development areas.
- 2.4 The JCS states that the upper limit is not necessarily a ceiling but any increase should be based upon the support of the community. The breach of this figure must not depend upon the decisions of local communities who will undoubtedly oppose development and seek to reduce numbers (as recently

experienced at a Workshop in Wickham). There should not be any reference to a ceiling.

- 2.5 The MTRA2 settlements are capable of making a significant contribution to the housing requirements of the PUSH area. They are very sustainable and are based upon well established settlements which have a wide range of facilities unlike the SDAs.

South Hampshire Strategy PUSH (October 2012)

- 2.6 The updated South Hampshire Strategy has been published by PUSH (October 2012). It is subject to further Consultation but it has essentially maintained the previous housing figures. It has indicated that the reason for any reduction is to reflect the recessionary implications. This should not be the basis for any change in the housing figures.

National Planning Policy Framework

- 2.7 The Modifications to the Local Plan Part 1 have not been sufficient to comply with the guidance in the National Planning Policy Framework.
- 2.8 The fundamental considerations are sustainability and housing supply. Paragraph 49 (NPPF) states that “Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites”. It is evident that an artificial limit on housing numbers is in conflict with the guidance in the NPPF.
- 2.9 Another key consideration is flexibility. Paragraph 21 (NPPF) states that “Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances”.

- 2.10 The two Strategic Development Areas in the PUSH area are expected to make very significant contributions to the overall requirement of the PUSH part of Winchester District of 5500 and of the overall figure for the District of 11000.
- 2.11 This is an excessive dependency on two locations which, as a matter of fact, relate to quite distinct geographical areas. The West of Waterlooville SDA (2500 dwellings) clearly serves the Portsmouth and Havant sub-region. The 3000 houses proposed for Whiteley take the form of an extension to the existing Development Area. Whiteley lies equidistant between the two Cities of Portsmouth and Southampton.
- 2.12 The reliance on two growth areas in PUSH severely limits choice. The NPPF Para 17 states that “Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities”.
- 2.13 This restriction of choice is compounded by the proposals for another SDA in Fareham. The Inspector who presided at the Examination in Public in respect of the Fareham Core Strategy concluded that the North of Fareham Strategic Development Area (NFSDA) should be reduced from 10000 to 7500 and he extended the plan period to 2031. The latest figure is 5400 between 2011 and 2026 ie 540 dwellings per annum (South Hampshire Strategy 2012)
- 2.14 Paragraph 3.72 refers to the Housing Trajectory in North Whiteley (SH3). It 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.

2.15 The Market Towns and Rural Villages within the PUSH area are spread across the PUSH sub-region and this geographical distribution also adds to the support and choice that they can offer to home seekers. The Market Towns and Rural Villages within the PUSH area could make a significant contribution to any shortfall in the SDAs. They also extend choice.

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

3.1 The artificial limit of 250 dwellings cannot be justified in the context of the provision of infrastructure. Such a limit would restrict development that could proceed on grounds of sustainability and could support much needed local infrastructure such as foul drainage and local highway improvements. No assessment has been made of capacity or local services.

3.2 It is already known from published studies that at least 250 units are required in Wickham to resolve pre-existing foul drainage issues (Drainage Reports previously submitted to the Council prepared by OPUS International on behalf of the developers). There is a further requirement to provide 4 hectares of public open space. Only a higher housing figure could ensure that the open space is laid out and associated facilities provided.

3.3 Development in the MTRA settlements will support existing facilities such as schools, shops and churches. On the other hand, it is evident from the requirements set out in the Policy SH3: North Whiteley that it relies upon the provision of two new primary schools and a new secondary school. 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 in Whiteley as there has been an inevitable lag between the housing development and the provision of facilities.

3.4 By contrast, 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.

3.5 Paragraph 3.90 (LP) refers to the provision of infrastructure. It recognises that “individual development proposalsmay require specific items of infrastructure or facilities and these will be identified and secured through the relevant planning application or allocation processes” This is clearly in conflict with the concept of a ceiling on the range up to 250 dwellings which may not be sufficient to fund such infrastructure.

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

4.1 It is evident that most of the settlements in the MTRA2 category lie within the area defined as the sub-region known as PUSH. These settlements have an entirely different role from the settlements and villages elsewhere in the District and in the National Park.

PUSH – South Hampshire Sub-Region

4.2 There is no justification in the Local Plan for treating the Market Towns and Rural Villages within the PUSH area as separate elements from the Strategic Development Areas of Whiteley and West of Waterlooville.

4.3 The capacity of the Market Towns and Rural Villages within the PUSH area has not been tested. The range of 150 to 250 is entirely arbitrary. It is unrelated to any assessment of sustainability in terms of the site specific considerations or the range of existing facilities or the need for greater development to support and extend the existing facilities.

4.4 The MTRA2 settlements 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 Downs National Park.

4.5 The commentary in paragraph 3.86 states that “the rural nature of this spatial area may be seen as a constraint”. This is entirely misleading in the context of the settlements in PUSH. It is evident that none of the settlements in the Market Towns and larger villages can be regarded as remote. Wickham is close to Fareham Town now and, in a few years time, it will be less than a mile from the North of Fareham SDA. Indeed, it is so close that a buffer or settlement gap is proposed between the NFSDA and Wickham (Policy SH4 – NFSDA). Denmead is situated in a similar proximity to the West of Waterlooville SDA. It should be made clear that paragraph 3.86 only relates to the villages and settlements in the National Park.

iv) Should the JCS define a network and hierarchy of centres, relevant to anticipated future development and economic changes, to meet the needs of their catchments?

5.1 The DCLG has required the Local Plan to be modified to identify a hierarchy in respect of shopping centres in the context of the NPPF (Modification 27 (Mods page 13)). It is noted that Wickham and Denmead are now to be recognised as District Centres within the Retail Hierarchy and this reflects the need to be compliant with the NPPF. Paragraph 3.84 (LP) states that “...Wickham and Denmead are identified as District Centres and have potential to deliver additional leisure floor space”.

5.2 This status should be reflected in the housing policy in relation to Market Towns and Rural Area (MTRA2). The range 150-250 should be extended to at least 300 for Wickham and Denmead to reflect the status in the retail hierarchy.

5.3 The NPPF paragraph 23 recognises that “residential development can play an important role in ensuring the vitality of centres and authorities should set out policies to encourage residential development on appropriate sites”.

- 5.4 It is evident that Wickham village requires greater protection from the North of Fareham SDA but the JCS is silent in this respect. The proposed District Centre to serve the NFSDA will also have an impact upon the village. More housing will help to protect the retail and community functions. The obvious solution is to provide sufficient new homes in the village to ensure that the viability of the commercial centre of the village is protected.

THE LOCAL PLAN PART 1 (CORE STRATEGY) IS UNSOUND BECAUSE IT FAILS TO COMPLY WITH THE REQUIREMENTS OF THE NPPF. IT DOES NOT PROPERLY REFELCT THE POSITIVE GUIDANCE ENDORSED BY THE COALITION GOVERNMENT

MAKING THE CORE STRATEGY SOUND

The Local Plan can be made sound by making the following amendments:-

1. The MTRA2 Settlements in the PUSH part of the District should be treated separately from the other settlements ie exclude New Alresford and Kingsworthy;
2. These settlements should be treated as part of the South Hampshire Area and it should be made clear that they can make up for any shortfalls elsewhere (particularly SDAs at Whiteley, West Of Waterlooville and even the North of Fareham SDA);
3. Development in the MTRA 2 Settlements in the PUSH area should be front loaded to make good the backlog and to optimise the social benefits of existing facilities;
4. The release of sites in these settlements should not need to await the outcome of the Local Plan Part 2 or Neighbourhood Plans because the decisions in respect of the range of development will have been made in Part 1 and previous consultations have provided the basis for future allocations;

5. for the above reason, paragraph 3.9 should be amended by the *deletion* of the words: at the end of the paragraph:

“WITH EXISTING SETTLEMENT BOUNDARIES MAINTAINED IN THE MEANTIME”.

6. Denmead and Wickham have been identified as District Centres and this should be reflected in the Policy:-

POLICY MTRA 2 should be amended as follows:-

In South Hampshire

In Bishops Waltham and ~~New Alresford~~, provision should be made for 400-500 new homes ~~in each settlement~~ and provision for *about 300* new homes in Denmead and Wickham and approximately 150-250 in each of the following settlements:- Colden Common, Swanmore and Waltham Chase

In Winchester Town and the SDNP

In New Alresford, provision for 400-500 new homes and *150-250* Kings Worthy

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2846 words