



Twyford Parish Council

c/o 5 The Close, Kiln Lane, Brambridge Park
Brambridge, Eastleigh, Hampshire, SO50 6HT

01962 715535

Twyfordclerk@gmail.com

www.twyfordpc.hants.gov.uk

Winchester District Local Plan – Part 1 Joint Core Strategy Examination

Responses to inspectors questions by Twyford Parish Council

Day 5 – TUESDAY 6th NOVEMBER 2012

MARKET TOWNS AND RURAL AREAS – Policies MTRA 1 -5, issue 8

Introduction

Twyford Parish lies at the extreme western part of the South Downs National Park. It is an ancient village which still sits within its recognisable boundaries and exhibits and contains historic and ecology assets of national and international importance. It is an active and varied village community and forms part of the setting of Winchester. It has a population of about 1500 and an exceptional range of jobs which more than balance those economically active and an exceptional range of facilities. It is accessible to rail, motorway, airport, population centres by foot, cycle and bus add to its accessibility. Its house prices are significantly higher than many of its neighbours. It's nearest large centre is Winchester (2 miles) and many people commute elsewhere to work. About 100 houses and major employment grown have been permitted in the last 10 years, mostly as departures from policy.

It is adversely affected by levels of traffic on B3335 which is bound to grow, and motorway and aircraft noise.

The comments which follow relate to Twyford but are also relevant to other villages, within the South Downs National Park.

- i) Are the proposals for growth and change in these areas appropriate and justified, including in relation to NPPF, and in terms of environment, economic and social impact, are the clear and deliverable?**

The policies MTRA 1, 3, 4 and 5 are a “business as usual” suite. It will allow the LPA additional development to be permitted in the Rural Areas including villages, unrelated to their needs or particular status. The past 10 years the local planning authority has been able to utilise similar policies to justify excessive development contrary to local wishes.

Twyford Parish Council

Joint Core Strategy Examination - Responses to examiners questions

While this may have been justified while Twyford was only one of many rural villages, now that it is within the South Downs National Park, a step change is required to recognise the additional duties imposed upon the LPA's by law. A resume of these laws will be given under CP19. Policies MRTA 1, 3, 4 & 5 all incorporate growth proposals/policies which do not appear to have been properly tested or to conform with NPF power 115, nor does WJCS incorporate the criteria based policies required by NPPF paragraph 113.

The Growth policies which allow growth contrary to NPPF and National Park duties are as follows:-

1) MRTA 1

Each of these bullet point listed here have the potential to increase the level of development beyond the level set by the DEFRA circular March 2010 (English National Parks and the Broads) in which the focus of new development is more constrained, for instance in housing to primarily affordable housing (see DEFRA paragraphs 76-79). It encourages employment in the countryside in excess of those required by the local community.

2) MRTA 3

This contains two lists of villages, one with settlement boundaries (which includes Twyford) the other with no settlement boundaries. Both lists include villages both inside and outside the National Park. There is no distinction in policy between the two sets of villages. It is difficult to see how this can be in conformity with NPPF, paragraphs 115-113, the statutory duties and the DEFRA circular. Development within development boundaries sets a presumption in favour of development which is unlikely to provide community benefits, as most infill within villages results in highly priced dwellings which are unaffordable. This policy applied over the last 10 years with Twyford has resulted in destruction of local character. In the context of the National Park, it is not fit for purpose.

The settlement boundaries have been rolled forward from the previous local plan without re-evaluation; there is no up to date evidence base to support the continued application 15 years later. In Twyford's case there is, for instance an un-happy overlap between parts of the conservation area and the settlement boundary, and substantial areas of housing and other development which are excluded.

The Strategic Environment Assessment as summarised on page 48 (table 6.1) places 3 question marks for boxes on the 3 key potential indicators (bio diversity, heritage, landscape). There is no separation between National Park villages and others on separate identification of SDNP.

The inclusion of Twyford as a settlement boundary village appears at odds at DEFRA circular paragraph 78 which excludes National Park Settlements from general housing targets. A distinction needs to make between national park Villages and ones outside as East Hampshire District Council is currently doing in their Local Plan.

The inclusion of the settlement boundary commits Twyford Parish Council to accept a level of development which may be conflict with conclusions it reaches when it prepares its Neighbourhood Plan, since Neighbourhood Plans cannot reduce the level of development contrary to the approved local plan. As infill development has no strategic purpose in WJCS and can have none in National Park villages, settlement boundaries can be removed without affecting housing targets. A boundary can be considered within the National Park Plan, shortly to get underway.

3) MRTA 4

This policy also fails to distinguish between the countryside inside and outside the SDNP. WJCS makes no distinction between the Countryside in SDNP, that around Winchester, in PUSH where growth is the major strategic objective or remote areas to the North and West of Winchester. Each of these areas has differing objectives.

The Statutory purposes of the SDNP determine what is appropriate in the National Park.

Bullet points 2 and 3 in particular appear to allow development in excess of those established in DEFRA circular March 2012.

The SEA page 48 fails to separate out the National Park considerations and appears to be inadequate, it negative in the key considerations 11, 12 and 13.

4) MTRA 5

Twyford Parish Councils objection to MTRA 5 is for the same reasons as to the previous policy MRTA4. This is because of the uncertainty of what is concerned to be major commercial / educational establishments in the countryside. Twyford contains two possible candidates, Twyford School and the other the former Chicken farms now a major commercial complex. The policy fails to distinguish between sites inside and outside the National Park, in the body of the policy. It is not clear how the remarks in 3.91 WJCS would apply to these other sites which fall either under MTRA 5 or 4. Additional clarity is needed here, particularly within the SDNP to distinguish on how to apply which policy with extra criteria is for SDNP.

Environmental, Economic and Social Impact

The only analysis for the impacts of the MTRA suite of policies is in table 6.1 of the SEA which tests MTRA 1 – 4 but does not include MTRA 5 which appears to be untested. The testing is against the 15 potential indicators set out in table 12.1. It is not clear how individual judgements have been made. For instance in potential indicator 1, “Building Communities” the assessment is strongly positive for MTRA1 as a whole. It appears unlikely that this would be the case for continued development with Twyford or South Downs villages in SDNP terms.

Under potential indicator 4 economy and employment, MTRA 1 – 4 are all assessed positive. In Twyford’s case such is the level of existing and approved employment that additional employment is more likely to increase in-commuting and firms which could as well locate elsewhere. The assessment is insufficiently sensitive to protect SDNP settlements from inappropriate development.

Twyford Parish Council

Joint Core Strategy Examination - Responses to examiners questions

iii) Is the categories' of the settlement suitable and appropriate, and if not, what should be changed and why?

South Downs's villages the categorisations are not suitable or appropriate. The South Downs Villages should be excluded, their settlement boundaries removed and criteria included to control development within them until replaced by South Downs Local Plan.

iv) Should the JDS define a network and hierarchy of centres?

The definition of a settlement as a centre with a particular function is generally accompanied by additional development. Twyford functions as a centre in a variety of ways. For medical, employment, educational and social activity. This level of activity has the potential to create tensions with its statutory purposes of the National Park. Any definition of network and hierarchy for the National Park villages is a longer term exercise to be done in partnership with the emerging National Park Plan.

Chris Corcoran

For and behalf of Twyford Parish Council