

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**

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**WINCHESTER DISTRICT LOCAL PLAN – JOINT CORE STRATEGY  
HEARING RESPONSE STATEMENT**

*Market Town and Rural Areas –Policy MTRA2*

**RESPONDENT NUMBER: 30071**

*On behalf of:  
Bewley Homes Plc*

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## Town and Country Planning Act 1990 (As Amended)

Winchester District Local Plan  
Joint Core Strategy

*Hearing Response Statement*

### MARKET TOWNS AND RURAL AREAS Policy MTRA 2

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## 1.0 Introduction

- 1.1 Neame Sutton Limited is Instructed by Bewley Homes Plc to prepare a Hearing Response Paper in respect of Issue 8 concerning the Market Towns and Rural Area Policy MTRA 2.
- 1.2 The remainder of this paper sets out Bewley's response to the specific questions raised by the Inspector.

## 2.0 Questions Raised by Inspector – Issue 8

- 2.1 Dealing with each question in turn below.

*(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?*

- 2.2 As previously set out in Bewley's representations in respect of the pre-submission consultation document and the Council's proposed modifications, in general terms, the policies and proposals for growth and change in the Market Towns and Rural Areas are considered appropriate. However, there are a number of notable concerns to be raised in relation to the policy framework as drafted, which require change to ensure that this section of the Plan provides a robust strategy that is consistent with National policy and is ultimately sound.
- 2.3 Policy MTRA2 does provide specific dwelling range allowances for the settlements identified with an increased provision assigned to the two higher order settlements of New Alresford and Bishops Waltham, which is supported by Bewley. However, in the context of the NPPF and the need to maintain flexibility within the plan to respond quickly to changes in circumstances throughout the plan period and also to ensure that adequate new housing can be provided to meet local needs, it is considered that the inclusion of a range of dwellings rather than a specific minimum target is unhelpful and unclear.
- 2.4 In setting a local target for the District as a whole the Council has opted for a lower figure than that set out in the adopted South East Plan. Bewley is broadly content with the lower figure proposed by the Council subject to it being expressed as a minimum target, which would be in line with the approach taken in the Southeast Plan and the core principle of achieving flexibility in housing supply borne out through the NPPF.
- 2.5 It therefore follows that the local settlement targets, specifically those in relation to New Alresford and Bishops Waltham should be expressed as minimum targets rather than a range as currently proposed by the Council.

- 2.6 This is particularly important when the District's reliance on housing delivery (50% of total supply) from only two strategic development locations is taken into account. It is vital that the Council has sufficient flexibility to respond both to changes in needs locally and to pick up any slack that may occur through unforeseen delays in the delivery of the strategic development locations.
- 2.7 The need for clarity within the policy is further compounded when the Council's delivery mechanism for these areas is taken into consideration. It is intended that the delivery of new housing will be bought forward through the Development Management process and, as necessary, through specific allocations either within the Part 2 Local Plan or the Neighbourhood planning process. Bewley is aware that both Bishops Waltham and New Alresford Town Councils have indicated a desire to pursue the Neighbourhood planning process and in this respect it is vital that the Local Plan policy framework provides a clear and consistent policy message.
- 2.8 The current drafting of Policy MTRA2 could lead to the natural conclusion that provision of new housing anywhere within the ranges identified would be appropriate, when in fact it would be more desirable for the settlements to plan for the higher levels of growth to accommodate both identified need and flexibility to change.
- 2.9 In terms of the capacity of the settlements to accommodate the growth envisaged and focussing specifically on New Alresford and Bishops Waltham, the evidence base that underpins the Local Plan (primarily the SHLAA – Document EB104) clearly confirms that adequate capacity exists to accommodate at least 500 dwellings in each settlement over the next 20 year period via a mix of previously developed land and sustainable urban extensions.
- 2.10 With regard to environmental capacity, whilst both settlements are subject to certain landscape and environmental constraints including the South Downs National Park, sufficient land exists that is well related to the settlement cores that could accommodate development without demonstrable harm to the wider landscape or environmental interests of acknowledged importance. This is confirmed in the landscape character assessment that identifies the most sensitive landscape areas within the District (Document EB215) together with the Council's Market Towns and Rural Areas Development Strategy (Document EB107) and the Council's Housing Technical Paper 2011.
- 2.11 With regard to the economic and social impacts of development, the Council's own assessment of the settlements contained in the Market Towns and Rural Areas Development Strategy (Document EB107) confirms that both New Alresford and Bishops Waltham contain a good level of existing service provision and local employment opportunities coupled with good public transport links. This point is generally accepted by the two Town Councils and the local community who, in response to the Blueprint consultation exercise, accept the need for change to respond to local housing, employment and community needs and to consolidate the role of the settlements as key service centres.

- 2.12 The two settlements of Bishops Watham and New Alresford can therefore be regarded as sustainable locations for accommodating growth by virtue of the Council's own assessments and as confirmed by feedback from the community and the respective Town Councils.
- 2.13 The approach proposed within this paper would also be consistent with the overall spatial strategy for the District and the other relevant policies within the plan, primarily because the Council itself has already tested the dwelling range figures that it proposes in draft Policy MTRA 2. Therefore to set a minimum target rather than a dwelling range would not result in any conflict or inconsistency with other areas of the plan. The Council's most recent Background Document entitled Housing Provision, Distribution and Delivery (June 2012) (Document BP1) confirms that the ranges identified have been tested.
- 2.14 Finally, it is important to highlight the Council's accepted position in relation to housing land supply in recent years (Document BP1a refers). At the current point in time the Council cannot demonstrate a 5 year supply of deliverable housing sites and its proposed resolution to this situation is to expedite the preparation of the Local Plan through to adoption to enable delivery from the planned strategic development locations.
- 2.15 It is considered that the current housing land supply situation combined with the Council's proposed solution represents a further demonstration of why the specific settlement allocations within Policy MTRA2 should be set as minimum targets based on the higher level figure. This will provide greater certainty that the Council's current shortfall in delivery can be rectified in the short term and in the event that the Strategic Development Locations do not deliver at the rate currently envisaged.
- 2.16 In accordance with the clear advice contained in the NPPF regarding the presumption in favour of sustainable development and the need to maintain a flexible supply of new housing in order to increase delivery, the case for identifying a level of at least 500 dwellings in each of these locations is clear.
- 2.17 This would also serve to provide clarity to the Town Councils if they are to progress along the Neighbourhood planning route as to exactly what they need to be planning for in order to maintain consistency with the Local Plan.

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

- 2.18 In short yes. Bewley's primary comments in relation to the issues of clarity and deliverability are set out in relation to question (i) above. In relation to infrastructure requirements the scale of development envisaged within each of the Market Towns and other settlements identified in Policy MTRA2 does not necessitate any strategic infrastructure improvements. At a more local level infrastructure provision will be required to enable the delivery of certain sites but this will be dealt with at either the site allocation or planning application stage.

2.19 The Council's own assessment of the transportation impacts of its development strategy insofar as it relates to the Market Towns and Rural Areas confirms that there are no barriers to the delivery of the higher level quantum of housing identified within the settlement specific allocations (Document EB115 Section 7 refers). In relation to Bishops Waltham the Council's assessment concludes that scope may exist for a high quality bus service to be provided and funded, in part, by development within Bishops Waltham, Colden Common, Wickham and the North Whitely Strategic Development Location.

2.20 From the perspective of the development site that Bewley has an interest in at New Alresford from the site specific technical work undertaken this has confirmed that all infrastructure requirements relating to development of the land can be accommodated as part of a future planning application proposal.

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

2.21 The current strategy identifies the two centres of New Alresford and Bishops Waltham as the 'main settlements', which both have high levels of population, service provision and connection with the surrounding communities. This statement is underpinned by the background studies that were undertaken to inform the Blueprint consultation process. In particular, the Council's background document (Market Towns and Rural Areas Development Strategy – Document EB107) draws a clear distinction between New Alresford and Bishops Waltham and the remaining settlements stating that they have quite different characteristics.

2.22 The more recent Background Document entitled Housing Provision, Distribution and Delivery (June 2012) (Document BP1) also confirms that the Council views New Alresford and Bishops Waltham as higher order settlements sitting above the other settlements in terms of the hierarchy.

2.23 Save and except for the dwelling range allocation the clear distinction identified by the Council's own background studies is not reflected in the policy as currently worded.

2.24 It is considered that the policy requires only minor modification to clarify the importance of the two Market Towns of New Alresford and Bishops Waltham. This will also serve to add clarity for the respective Town Council in the event that they decide to pursue the Neighbourhood planning route.

(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 catchment?*

2.25 The short response in relation to this question is yes. To elaborate, it is considered that the strategic set out within policies MTRA 1 and 2 does go a long way towards achieving this. Bewley's concerns in relation to this point overlap with those set out above in relation to questions (i) and (iii) and in the interest of brevity are not therefore repeated.

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