

Issue 1 – Strategy/ Vision/ Sustainability – Policy DS1

Personal ID No: 3440

Terence O'Rourke Ltd on behalf of North Whiteley Consortium

ISSUE 1 STRATEGY/VISION / SUSTAINABILITY – POLICY DS1

i) Does the Joint Core Strategy [JCS] provide an appropriate spatial vision for the district over the plan period, consistent with national guidance in the NPPF and/or justified by clear and robust evidence and, if not, what is the best alternative and why?

- 1.1 The North Whiteley Consortium supports the development strategy for the South Hampshire Urban Areas outlined in Policy DS1, where growth is focused at strategic urban extensions rather than dispersing growth amongst the smaller settlements that also lie within the PUSH boundary.
- 1.2 The spatial vision is founded on a credible evidence base and extensive consultation, both with the public and technical stakeholders (reference is made to the Local Support for North Whiteley – March 2012 document as previously submitted to the Inspector). Indeed, it is considered that the identification of North Whiteley as a strategic housing site is robust and appropriate; the site is available, suitable and deliverable.
- 1.3 The Core Strategy is in general conformity with the NPPF. It sets out a positive vision for the future of the district and the aspirations for economic growth and the delivery of new homes at North Whiteley is in accordance with the Government's growth agenda.
- 1.4 The presumption in favour of sustainable development is central to the policy approach in the NPPF, as it sets the tone of the Government's overall stance and operates with and through the policies contained within the framework. The delivery of North Whiteley will provide sustainable growth in accordance with the Government's objectives – offering the opportunity to deliver sustainable economic growth and new homes in a location that contributes towards meeting the objectives of the JCS.
- 1.5 The NPPF outlines 12 core land use-planning principles that should underpin both plan making and decision taking. The spatial vision aims to create a sustainable new neighborhood at North Whiteley, which integrates with the existing settlement, and is in conformity with these principles.
- 1.6 In our pre-submission representations dated 12 March 2012 and 30 July 2012 we made a series of representations relating to the detailed wording within (at the time) paragraphs 2.21 – 2.24. These representations remain valid. The key points are summarised below:
 - Seek flexibility to 40% affordable housing target revised paragraph reference and policy SH1)
 - Revise the use of term 'focal point' (revised paragraph 3.55)
 - Mitigation of environmental impacts (revised paragraph 3.56)

Issue 1 – Strategy/ Vision/ Sustainability – Policy DS1

Personal ID No: 3440

Terence O'Rourke Ltd on behalf of North Whiteley Consortium

ii) Has the JCS been the subject of suitably comprehensive and satisfactory sustainability appraisal [SA], strategic environmental assessment [SEA] and an appropriate assessment [AA] and if not, what else needs to be done?

1.7 The JCS is founded on a credible evidence base and the identification of North Whiteley as a strategic housing site is robust. Alternatives have been thoroughly tested through SA, SEA and AA and the current proposals for North Whiteley are sound. Sufficient work has been undertaken to allocate North Whiteley as a strategic housing site within the JCS.

iii) Will the strategy satisfactorily and sustainably deliver the new development needed to meet the objectives over the plan period and, if not, why not and what needs to be changed?

1.8 Yes. The strategy will satisfactorily and sustainably deliver the new development needed to meet the JCS objectives over the plan period. Specifically in relation to North Whiteley the development will make a significant contribution to meeting the development needs of the PUSH area both in terms of housing need (55,600 net additional dwellings by 2026- South Hampshire Strategy, October 2012) and infrastructure provision over the plan period.

1.9 Notwithstanding this there are concerns relative to both the level of additional housing that Winchester is proposing over the plan period (2011 to 2031) for the PUSH area of the district and the broad methodology that has been used to establish such strategic PUSH figures.

1.10 It is acknowledged that Winchester's South Hampshire Urban Area does not cover the same area as PUSH (refer to page 34 of Background Paper -1 Housing Provision, Distribution and Delivery), whilst the JCS covers a period from 2011 to 2031 (20 years) compared to PUSH's South Hampshire Strategy, October 2012 which runs from 2011 to 2026 (15 Years).

1.11 The JCS suggests that there will be an additional 5,500 dwellings over the plan period within the PUSH area, whilst this increases to a range of 6,540 to 7,250 dwellings when including relevant settlements that PUSH considers to fall within its area. This compares to a figure of 6,200 (Policy 11) contained within the South Hampshire Strategy. Although this might suggest that the JCS is more than satisfying the PUSH target, when regard is had to the plan periods if a simple calculation is carried out it is apparent that the JCS is actually under providing within the PUSH area by a minimum of 1,017 (8,267 – 7,250) units up to 2031. This is based on $(6,200/15) \times 20 = 8,267$. Given this, it is important that flexibility is built into the plan to allow increased provision beyond the 5,500 set out in the JCS for the PUSH part of Winchester.

Issue 1 – Strategy/ Vision/ Sustainability – Policy DS1

Personal ID No: 3440

Terence O'Rourke Ltd on behalf of North Whiteley Consortium

- 1.12 There is further concern relative to the PUSH figures as it can be noted that the PUSH approach has always been economic led growth, with housing being provided to serve this. The NPPF now makes it clear that authorities should prepare a Strategic Housing Market Assessment (SHMA) that *'meets household and population projections...and caters for housing demand and the scale of housing supply necessary to meet this demand'*. This is in conflict with PUSH's pure economic approach. Further, targets should now use the 2011 census data as the starting point, whilst anecdotally it is understood the said figures demonstrate that growth has been higher than had been projected, meaning that it is likely that the PUSH, and accordingly WCC's, target is already overly pessimistic.
- 1.13 It is acknowledged that given the duty to co-operate and the time involved in reviewing the strategy the most recent PUSH information and RSS figures are the most reasonable to use at this time. This said, in light of the clarification given by the NPPF on approach and the availability of the latest census information there would appear to be a strong case for the policy to recognise the need for an early review of housing targets. Accordingly the North Whiteley Consortium suggest the following revised/ additional wording to policy DS1:
- **The South Hampshire Urban Areas will make provision for two sustainable new neighbourhoods to provide a minimum of 5,500 new homes in response to PUSH targets (amended text)**
 - **The market towns....settlement identity** (text as existing at third bullet)
 - **There shall be an early review of housing targets** (new text- need for supporting text to recognise NPPF and census data to justify this)
- 1.14 Constraints analysis and sound master plan testing has suggested the North Whiteley site is capable of delivering more than 3,000 houses. Coupled with viability work undertaken to date we would suggest that the evidence base supports a revision to the policy to support about 3,500 new homes at North Whiteley.
- 1.15 Relative to North Whiteley, it can be noted that the development will:
- Make a significant contribution to meeting locally identified development need and wider PUSH development aspirations
 - Provide for a wide choice of high quality homes to meet the needs of the whole community, including the provision of a significant quantum of affordable homes to meet a demonstrable shortfall in supply
 - Assist with improving internalisation and sustainability of traffic movements within Whiteley by providing housing in close proximity to one of the largest employment concentrations in Hampshire, comprising the Solent and Segensworth Business Parks. It is noted that Whiteley needs improvement in this regard, being one of the least contained settlements within Hampshire,

Issue 1 – Strategy/ Vision/ Sustainability – Policy DS1

Personal ID No: 3440

Terence O'Rourke Ltd on behalf of North Whiteley Consortium

with only 24.9% of residents living and working within the town (Census 2011)

- Provide a range of sustainable transport choices which aim at achieving a modal shift away from dependence on the private car
- Provide extensive areas of green infrastructure to help create healthier lifestyles and improve biodiversity. The substantial areas of green space and the strong landscape framework will provide an exceptionally high quality environment for the new community
- Minimise the impacts on biodiversity and provide net gains wherever possible

iv) Are any objectives, policies or proposals inconsistent with national guidance and, if so, is there a local justification supported by robust and credible evidence?

1.16 The proposals for the North Whiteley are in accordance with the NPPF and the principles for sustainable development. Refer to **Appendix 1** of our statement to Issue 6 (Policy SH3) North Whiteley Delivering Sustainable Communities document, which highlights the opportunities the scheme offers and general benefits that this sustainable development would bring.

v) Is there clear evidence demonstrating how and why the preferred strategy was selected, including in terms of appropriate consultation with the public, representative bodies, neighbouring authorities, service and infrastructure providers and other interested parties?

1.17 The allocation of North Whiteley as a strategic housing site has been comprehensively tested and found to be robust and sound. In addition to the formal processes (SA, SEA and AA) discussed above at paragraph 1.7 above the allocation has been tested repeatedly through extensive stakeholder and community consultation. Consultation activity supports the Council's position that the allocation of North Whiteley is sound and that the current proposals represent the most suitable option.

1.18 In addition to the informal and formal consultation undertaken by the Council in developing the JCS the North Whiteley consortium has undertaken extensive engagement. This has ranged from meetings with Winchester City Council officers, to public exhibitions, meetings with local groups, engagement with statutory bodies, technical stakeholders and neighbouring authorities.

1.19 It should be noted that WCC has also set up the Whiteley Forum, being a formal gathering comprising of Council members, officers and parish councilors, with invited participants from neighboring authorities/ parish Councils. The Forum provides an opportunity for members of the public to be updated on progress on

Issue 1 – Strategy/ Vision/ Sustainability – Policy DS1

Personal ID No: 3440

Terence O'Rourke Ltd on behalf of North Whiteley Consortium

working towards the production of a planning application for North Whiteley, allowing presentation by experts and facilitating questions. Such a process keeps residents advised of progress and issues arising, whilst allowing the emerging proposals to respond to matters raised.

- 1.20 A 'Local Support for North Whiteley' (March 2012) document was submitted to accompany those representations prepared by the North Whiteley Consortium to the Pre Submission Stage (further copies can be provided as required). This report demonstrates how the strategic allocation at North Whiteley in the Local Plan Part 1 has been supported as Winchester City Council's Core Strategy has progressed. Although not an exhaustive list, the report sets out the extensive community consultation that has taken place over the last four plus years to inform the evolution of the North Whiteley master plan.
- 1.21 The level of consultation and community involvement has been significant and provides clear evidence that demonstrates that the spatial strategy to allocate North Whiteley is both appropriate and robust.
- 1.22 A planning application is in the process of being prepared which will contain the detailed transport, environmental assessment and supporting work required to allow the Council to determine the application against the statutory plan and other material considerations, which will be informed by further consultation with the community and technical stakeholders.