

I support the Representations of WCRA Winchester City Residents Association, CPRE, Winchester City Trust, Friends of the Earth, Save Barton Farm Group.

In addition :

Section 1.19 to 1.23 Community Strategy requires 1.19 “extensive consultation” and “evolved together, following early joint community engagement...” There are also additional sections on Consultation.

<http://www.winchester.gov.uk/planning-policy/local-plan-part-1/issues-options/>

“Core Strategy Issues and Options document was consulted on between 3 January and 15 February 2008”

“We received a total of 2,859 responses”

[Results of multi-choice questions](#)

<http://www.winchester.gov.uk/assets/files/226/I-OquestionnsresultsFINAL.pdf>

“4a.
Bearing in mind the housing requirement in this part of the District (5,500 dwellings between 2006 and 2026) and the evidence detailed in the Issues and Options paper, which of the 2 options do you prefer?

Option 1 17%

OR Option 2 83%

Total responses = 1046”

“If you prefer the ‘step-change’ approach for Winchester Town, there are 4 strategic growth options for housing and/or business/commercial purposes:

- Area 1 (North of Winchester (including and beyond the existing boundary of the MDA at Barton Farm))
- Area 2 (West of Winchester)
- Area 3 (South-west of Winchester)
- Area 4 (South of Winchester)

5a.
Please tick one box to indicate the area you think is most suitable for major development. (Please tick one box)

Area 1 78%

OR Area 2 3%

OR Area 3 4%

OR Area 4 14%

Total responses = 407”

SBFG Note – 407/1046 = only 38.9% of Question 4a responses, yet over 2000 SBFG responses were delivered by hand to WCC and all **objected** and said WCC should NOT build on Area 1 “Neither” for Question 4a and “Neither” for Questions 5a. SBFG Objections exceed the total number WCC have quoted (only 1046 for Question 4a and only 407 for question 5a). This is UNSOUND consultation and does not show the responses of a majority of Resident voters.

1. WCC website congratulates themselves on “Blueprint” winning an award for “adding an element of fun”. WCC consultations were unsound, and Joint Core Strategy does NOT show that WCC actually took account of and made changes and improvements as a result of consultations. In just one example WCC “Issues and Options” gave two options to either ‘Build 2000 houses on Barton Farm’ or ‘Build even more houses on a larger area Barton Farm area’. More than 2000 objected and chose “Neither”, yet I do not remember Evidence WCC counted this and took account of this – WCC put Barton Farm as their “Preferred Option”.

WCC

SBFG handed in a January 2009 Petition of 1935(?) names to Winchester City Council objecting to the WCC Preferred Option to build on Barton Farm. This is near to double the WCC “Issues and Options” totals, so WCC voters definitely did NOT “Prefer” the “Option” to build on Barton Farm. The Preferred Option is unsound.

I have not seen any WCC evidence list of *any* changes made in support of Consultation responses (except the decision to build on Barton Farm which is *opposite* to expressed Public opinion and SBFG supporter responses).

WCC “Preferred Option” document committed to their Spatial Planning Vision as

“Winchester District will retain its distinctive identity as a predominantly rural area of countryside, villages and market towns”

“The District’s rich heritage, biodiversity and landscape, a significant part of which falls within the proposed South Downs National Park, will be maintained”

WCC now breach BOTH declared policies by building on the valuable Winchester Landscape Setting that brings repeat Tourism income – Landscape Setting local “Reserve Sites” at Francis Gardens (Abbotts Barton), and Pitt Manor are in the planning process of being built over, next WCC plan to lose Strategic Reserve Site “Barton Farm”.

This is UNSOUND and risks loss of the **repeat Tourism that earns Hampshire income**.

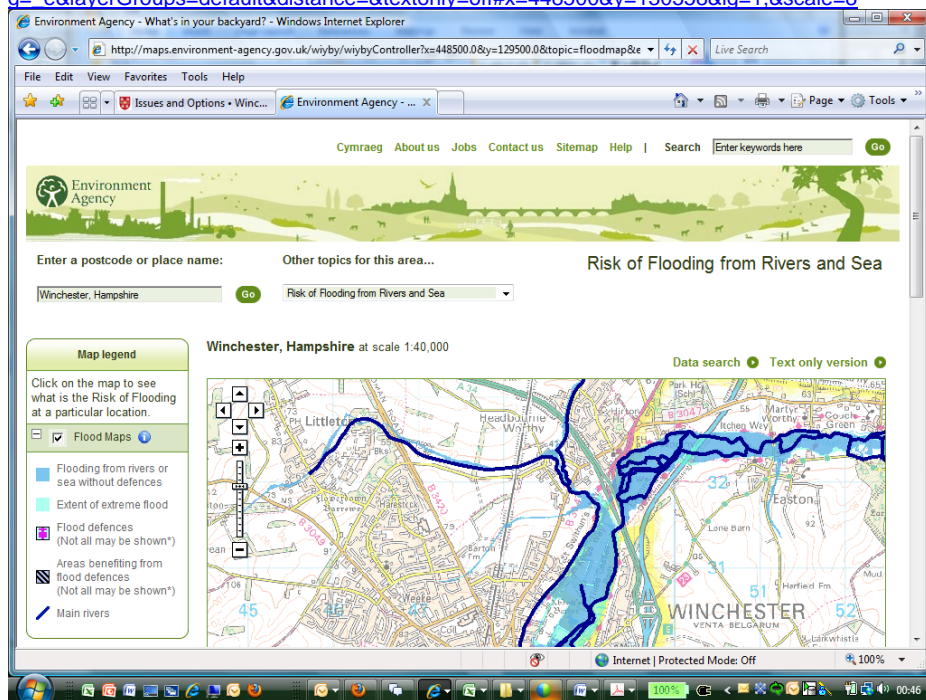
This is in BREACH of **Central Government Policies to increase Tourism income**, such as “GREAT Britain”.

2. WCC inadequate consideration of valid Alternatives and lack of evidence WCC considering Alternatives either at all nor in sufficient detail. WCC do not show options considered, let alone ways to implement Alternatives or else changes needed to make Alternatives valid or else reasons why Alternatives could be never by implemented. Alternatives in Public knowledge included the “SNUG” proposals presented at “WinACC” (Winchester Action on Climate Change”) for a total of about 2000 houses on Brownfield sites within walking distance of Winchester town centre. Councillors had heard the SNUG proposal yet I have seen no evidence in WCC Joint Core Strategy of detailed nor any consideration of this nor other Alternatives.

NOTE that Barton Farm flooded in Autumn 2000 – so within 12 years. Flooding evidence shows building in 1 in 50 years or 1 in 100 years Flood Risk is unsound, is against central Government policy, and building in Flood Risk has caused or contributed to recent frequent Floods (media have reported the multi million costs of Flooding in Tewkesbury, Cumbria, Megavissey, Cockermouth, etc, etc). The “Pitt Report” to central Government includes examples and details.

WCC 2008 “Issues and Options” also contained a factual omission likely to materially affect voters responses. “Issues and Options” marked with XX an area “Itchen Flood Plain and National Park”, but *neglected* to show/mark the Environment Agency Flood Map that showed the thread from the Itchen Flood Plain that crosses Barton Farm.

<http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=448500.0&y=129500.0&topic=floodmap&ep=map&scale=8&location=Winchester.%20Hampshire&lang=e&layerGroups=default&distance=&textonly=off#x=448500&y=130558&lq=1.&scale=8>



WCC Joint Core Strategy is UNSOUND, contravenes central Government Policies and laws, and is UNJUSTIFIED.

Modification 6

The area covered by the South Downs National Park will have its own Local Plan LDF in due course, which will then supersede the part of this Plan covering the National Park (references in this Plan to the Local Planning Authority may refer to Winchester City Council or the South Downs National Park Authority as relevant in each case)

Modification 13

A large portion of the District lies within the South Downs National Park. The Park Authority will be preparing its own Core Strategy Local Plan with anticipated adoption in 2014 5.

<Caesar note - So how much does that reduce Housing numbers and other Policies ?>

Modification 19

In recent years between 2003 and 2009 there was a 4% increase in jobs resulting in a total of 69,090 jobs across the District³. Whilst there remains considerable uncertainty over future employment growth, there is an **acceptance that the recession has led to a permanent loss of economic capacity.**

Looking forward, the total District employment is anticipated to grow to 2031 by 13% (8750 jobs), the main growth sectors in the District are expected to be being the service sector (primarily business services), health, distribution and retail, construction and transport.

< Caesar note – WCC have not taken adequate account of economic downturn and Recession>

First WCC admit there is a **recession**

Second WCC admit that recession has led to a **permanent loss of economic capacity = a permanent loss of ability to pay for houses** so a permanent reduction in housing need;

Third WCC forecast an optimistic employment “to grow to **2031 by 13%** (8750 jobs)” over 19 years = 0.684% per year where WCC have already admitted economic recession, which is negative growth not positive growth = - **so housing number growth should be no more than 13% or less, even before** you take account of

(3a) **reduced ability to pay for houses** due to **reduced salaries**

(3b) and **reduced bank lending**

(3c) and **economic uncertainty and economic insecurity** reducing both ability and willingness to commit to a long-term 25 year mortgage.

Forthly – what percentage of the 13% (8750) in “service sector (primarily business services), health, distribution and retail, construction and transport” will actually be able to afford to buy the houses of each size/value planned ?

WCC plan is unsound by failing to show the percentage of income levels able to afford each housing price bracket.>

Fifthly – WCC admit they needed to reduce business and retail space requirements by/to about 60%.

WCC would then need to also reduce Housing requirements by the same percentage – smaller retail needs are due to smaller customer needs, and **fewer customers need fewer houses.**

Modification 23

Winchester Town - As the largest settlement in the District, Winchester is home to **36% of the District’s population** and about **50% of the total District employment provision.**

The Council supports the updated PUSH economic development strategy and proposes to play its part in meeting this through the provision of housing (5,500 dwellings), facilities and employment areas.

Market Towns and Rural Area - This area of Winchester District includes 50 or so smaller settlements, which range from larger villages to small hamlets. The varied nature of the settlements in this part of the District requires...
... whilst **protecting the rural nature and character of the villages and surrounding countryside**, many of which now lie in the South Downs National Park
... approximately 76,000 people live in this spatial area.
< Caesar note – rural nature and character of Hampshire Landscape setting adds value that earns Hampshire tourism and economic income >

Pre-hearing meeting 13 September
May flag to WCC areas they will need to change.
May need to repeat Sustainability Assessment and Consultation

NPPF requires a Plan B for MDA for economic downturn, developer failure, etc.
PINS guidance to Inspectors is now in WCC Modifications
Page 109 Mod 141 AMR report to monitor how well Plan is delivered, and any changes needed. (Flexibility)

WCC need to relate all changes/additions to NPPF (currently Policy guidance), and to Localism Bill (April 2013)
WCC need to re-assess Objectives and housing needs in light of demographics – Census shows reduced numbers.

NPPF – Para 26 of PPS23 – NPPF requires maximum use of **Previously developed Land** (brownfield sites).
WCC have NOT adequately considered brownfield alternatives (SNUG proposals, etc) – UNSOUND.

- Para 126, 127, 128, Setting of Winchester as a “Heritage asset”.
- Winchester and Hampshire Landscape setting is a Heritage Asset that earns income for Hampshire. Losing the green wedges of Landscape Setting would lose Hampshire income.

Landscape Setting gained Special mention in SE Plan

Para 52 - Landscape setting and Heritage assets – protecting, but not as Green Belt.

- WCC have only produced 1 version = 4000 with no alternatives. There are alternatives such as SNUG proposal.
 - SNUG (Paul Bulkeley) identified alternatives including Tesco site at Bar End. 2000 on 3 sites (Bar End, Andover Road near Winchester station). WCC have seen the SNUG proposal and did not consider nor include it.
- UNSOUND