

Winchester District Local
Plan Part 1

Examination

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(30104)

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1. Housing – General (Issue 3)

Is the overall number and the locations of new housing consistent with the JCS objectives and realistically deliverable within the plan period, taking into account the SHLAA and the opportunities identified, including in Winchester and other centres? (Question 1).

- 1.1 We have outlined our concerns with the local housing requirement set out in the JCS in our previous written submission (i.e. that it is not justified by objective evidence and fails to reflect sub-regional need).
- 1.2 Since our previous comments, PUSH has published its updated strategy. Please refer to our comments made under Issue 8 on this matter.

Should the JCS address contingencies/alternatives, including in relation to the strategic allocations, in the event that completions do not come forward as expected? (Question 4).

- 1.3 Yes. It is important that the JCS identifies appropriate contingencies. Please see our comments made in response to Issue 8 on this matter. In summary, to be consistent with national policy (the NPPF), the plan should include greater flexibility over housing numbers in the rural settlements so that development opportunities in line with the presumption in favour of sustainable development can come forward and contribute to maintaining housing land supply in the growth area.
- 1.4 Exclusion of the MTRA villages in the PUSH area from the growth area housing provision is not the most appropriate strategy, and consequently the plan is not positively prepared, and fails the justification test.
- 1.5 The MTRA villages in the PUSH area should be recognised as having a strategic role in the growth area, including acting as a source of sustainable growth that could compensate for any failure of the strategic allocations for the PUSH area to deliver as planned. Paragraph 3.72 of the JCS states that the Council may have to review housing land supply if the North Whiteley SDA fails to deliver the level of housing proposed. This point, which can be applied to the other SDAs, justifies the logic that the other settlements in the PUSH area, including the larger villages and district centres, should be recognised as being available to help address housing land supply issues.
- 1.6 These settlements that already have established infrastructure, including schools, retail and community facilities, are able to support further sustainable growth, early in the plan period.
- 1.7 In the case of Wickham, there is also a case for growth to help support and add to the existing facilities and services to protect and improve its self-containment, in the context of further competition from the North Fareham SDA and its proposed facilities and services.

- 1.8 Please refer to our response to the questions raised under Issue 8 for our comments on how the plan should be changed.

2. Market Towns and Rural Areas (Issue 8)

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? (Question 1).

- 2.1 We do not consider the spatial strategy for the MTRA to be in accordance with national policy (the NPPF), in respect of the presumption in favour of sustainable development, flexibility, effectiveness and the use of evidence.
- 2.2 The WDLP Part 1 appears to be confused about where the village of Wickham sits in the settlement hierarchy, despite the evidence base identifying it as a district centre. This issue, how this affects the housing distribution and our contention that Wickham should be identified as able to accommodate a higher level of growth, is explored further in our response to Question 3.
- 2.3 The NPPF defines sustainable development as including the three dimensions of an economic role, a social role and an environmental role (paragraph 7). Regarding its social role, this includes providing the supply of housing required to meet the needs of present and future generations.
- 2.4 The NPPF goes on to explain that the presumption in favour of sustainable development should be the basis for all plans (paragraph 15). This includes the requirement to plan positively to support local development (paragraph 16). It also means local plans should have sufficient flexibility to adapt to rapid change (unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits).
- 2.5 In its core planning policies, the NPPF requires local authorities to positively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs, and respond positively to wider opportunities for growth (paragraph 17).
- 2.6 In regard to plan-making, the NPPF requires local plans to be aspirational but realistic, identifying opportunities for development (paragraph 154).
- 2.7 The NPPF is very clear in its objective to ‘*boost significantly the supply of housing*’ (paragraph 47).

- 2.8 In this context, the housing strategy in regards to the MTRA strategy, the plan is not in conformity with the NPPF. Sustainable opportunities for growth are artificially constrained by policy MTRA2 by its inclusion with the villages rather than with the district centres and the PUSH growth area.

Is the plan sufficiently flexible?

- 2.9 Notwithstanding paragraph 3.87, which makes it clear that the allocation of 1,500 dwellings in the MTRA area is not a ceiling to housing development, and that the numbers can be exceeded where there is local support, policy MTRA2 is not in accordance with NPPF as it sets an absolute cap on the growth in the villages. This sends a confusing message to the local communities and is likely to be used to resist growth, even where there are strong planning reasons for it, not least, the presumption in favour of sustainable development. It is the role of the JCS to identify the appropriate housing provision.
- 2.10 The majority of the housing numbers in the PUSH area are planned for the strategic developments at West of Waterlooville and North Whiteley. Should these strategic sites fail to deliver the allocated numbers, or fall behind the expected delivery rates (paragraph 3.72 of the JCS), it would be appropriate for the most sustainable settlements in the rural areas of PUSH to be available to assist with maintaining housing supply.
- 2.11 This requires greater flexibility within policy MTRA2, which at present restricts growth to a maximum range of 150 to 250 dwellings in the larger villages, without apparent consideration to whether there is the capacity, and existing local services, to support higher levels of growth.
- 2.12 Our reservations about the flexibility of the plan are compounded by the recent update of the PUSH strategy (October 2012) and the implications for the housing numbers.
- 2.13 The PUSH strategy identifies a housing requirement for the Winchester part, of 6,200 dwellings between 2011 and 2026. This works out at 413 dwellings per annum. When extrapolated to cover the JCS plan period (2011 to 2031), the total PUSH requirement is 8,267 dwellings.
- 2.14 As set out in the Housing Background Paper (June 2012), Winchester is planning for a maximum of 7,250 dwellings for the PUSH area to 2031. This is some 1,017 dwellings short compared to the latest PUSH strategy. This justifies including greater flexibility within the JCS, including in respect of the housing requirements in the rural settlements in the PUSH area.
- 2.15 This shortfall is likely to be further compounded, we consider, as the PUSH strategy is economically led and reflective of the continuing difficulties with the economy, rather than being based on demographic

evidence. 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 Strategic Housing Market Assessments (SHMA) that '*meets household and population projections...and caters for housing demand and the scale of housing supply necessary to meet this demand*'.

- 2.16 If the PUSH strategy reflected population projections (in accordance with the NPPF, paragraph 159), including the latest Census data (2011), it is likely that the gap between the JCS and the sub-regional requirement would be wider.
- 2.18 In the absence of objective sub-regional evidence, however, the PUSH strategy and South East Plan are the best available evidence on which to base the housing requirements in the Winchester part of PUSH.
- 2.19 However, acknowledging the duty to cooperate and the benefits of having a plan in place, there would appear to be strong case for committing to an early review of the plan, and for the time being, ensuring that the most appropriate strategy is adopted for the PUSH villages.

Sequential approach to development in the rural settlements

- 2.20 A further concern regarding the lack of flexibility of the JCS, and therefore non-conformity with national policy, relates to the sequential approach to development. Policy MTRA2 expresses a preference for directing housing growth in the rural settlements to opportunities within the established settlement boundaries in the first instance, and only to support greenfield extensions following a review of capacity, or to meet an identified community need.
- 2.21 While this sequential approach is generally appropriate, it should not be applied too rigidly if the plan is to conform with the NPPF (paragraph 52), which recognises that the supply of homes can, in some circumstances, be best achieved through planning for larger scale developments, including by extensions to existing villages and towns. (Further comments on this issue are made under Question 2).
- 2.22 Future development in Wickham is an example of a case where this issue is likely to be relevant. As we have commented on in previous written representations, the SHLAA identifies that there is very limited capacity within the settlement, and we have established that the local community is supportive of growth on the northern edge of the established boundary. Review of settlement boundaries will not happen until Part 2 of the WDLP therefore, this sustainable development opportunity in Wickham may be held back unduly. With greater flexibility in policy MTRA2, this site could come forward earlier in the plan period and improve housing land supply, in conformity with the presumption in favour of sustainable development.

Conclusion

- 2.23 In order that the spatial strategy is in conformity with the NPPF, including having sufficient flexibility, to be effective on delivery, and clear in respect of the hierarchy of settlements and their relationship with the PUSH growth area, policy MTRA2 should be amended to **include Wickham within the category for district centres**. This should be reflected by changing policy MTRA2 to include Wickham in the category of 400 to 500 dwellings, or an interim range between the larger villages and the larger district centres.
- 2.24 The overall provision for the rural areas should also be reviewed (policy CP1), and greater flexibility included in the strategy so that more than 1,500 homes can be delivered in this spatial area, where they are in accordance with the presumption in favour of sustainable development. This will provide the plan with more appropriate contingency in the event the larger housing allocations do not deliver as proposed.

Are they clear and deliverable, including in respect of the associated infrastructure requirements? (Question 2)

- 2.25 The spatial strategy for the MTRA (policy MTRA2) requires greater flexibility to allow the sustainable development opportunities on the edge of settlements to come forward. In some cases, such as the opportunity on the northern boundary of Wickham, a larger village extension is likely to be the best or only way that required infrastructure, including solutions to known infrastructure problems, is likely to be delivered.
- 2.26 It is appropriate for the JCS to direct development to opportunities within settlement boundaries in the first instance. To be in accordance with the NPPF's presumption in favour of sustainable development, and paragraph 52, where this is not possible, or other locations on the edge of settlement are more desirable, the plan should have the flexibility to support wider growth opportunities. This flexibility should be followed through in the WDLP Part 2 and its detailed review of boundaries.
- 2.27 Policy MTRA2 should be amended at paragraph 4 (page 69) as follows:

*Housing, employment, retail and services should be accommodated through the development and redevelopment opportunities within the existing settlement boundaries in the first instance. Sites outside settlement boundaries will only be permitted where, following an assessment of capacity within the built-up area, they are shown to be needed, or to meet a community need or realize local community aspirations identified through a Neighbourhood Plan or other process which demonstrates clear community support, **or they are demonstrated to be the best solution in accordance with the presumption in favour of sustainable development.***

Is the categorisation of settlements suitable and appropriate and, if not what should be changed and why? (Question 3).

- 2.28 As explored above, the allocation of housing numbers to the MTRA settlements is inconsistent and illogical. In respect of the settlement of Wickham, the WDLP Part 1 acknowledges that the settlement is a District Centre, in the same category as the market towns of News Arlesford, Bishops Waltham and Denmead (Policy DS1 and paragraph 3.84). This was clarified in the proposed modifications.
- 2.29 This categorisation of the rural settlements, based on an assessment of the capacity for growth in retail and leisure, an understanding of the facilities and services they provide and of the role they play in the rural areas, has not been followed through into the housing distribution for the district. We fully support the findings of the assessment.
- 2.30 However, in contradiction to these findings, Policy MTRA2 includes Wickham within the second tier of housing provision (150 to 250 homes). Considering the evidence base, including the Council's Market Towns and Rural Area Technical Paper (2011), Wickham performs very well in terms of services and connectivity. It is therefore inconsistent with the NPPF's presumption in favour of sustainable development to artificially cap housing in this sustainable location.
- 2.31 This is especially the case in the context of the latest PUSH strategy and its implications for housing need (discussed in detail in response to Question 1).

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?

- 2.32 It is entirely appropriate for the JCS to identify a hierarchy of settlements and use this as a basis for distributing growth. This approach is in conformity with the NPPF's presumption in favour of sustainable development, including

planning for development in the right places, places with accessible local services, and to meet the community's needs and support health, social and cultural well-being.

- 2.33 As we have commented under Question 2, the JCS is confused about the rightful place of Wickham in this hierarchy. The published evidence base (the Economic and Employment Land Review by SQW, 2009) recognises it as a market town, in the same category as Bishops Waltham and New Arlesford. Following modifications, the JCS now recognises Wickham is a district centre (Policy DS1, and paragraph 3.84). But in respect of housing numbers, the JCS includes the settlement with the larger villages. This is an inconsistency in the plan and is not in conformity with the NPPF's presumption in favour of sustainable development.
- 2.34 We have set out how we consider the plan should be amended under Questions 1 and 2 so that the most appropriate strategy is followed.