

Examination in Public
of the
Winchester District Local Plan Part 1
Joint Core Strategy

Hearing Statement in respect of representations on Policy MTRA 3

on behalf of:

Humphrey Farms Ltd

Our ref: 765

Representation reference number: 30088

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1.0 Introduction

- 1.1 This statement has been prepared in support of representations made on the Winchester District Local Plan Part 1 – Joint Core Strategy on behalf of Humphrey Farms Ltd (ID Ref. 30088).
- 1.2 This statement demonstrates why the Joint Core Strategy as currently drafted is unsound and sets out what changes should be made to make it sound.

2.0 What part of the Joint Core Strategy is unsound?

- 2.1 As presently drafted, Policy MTRA 3 of the WDWLP is unsound.

3.0 Which soundness test does the Joint Core Strategy fail?

- 3.1 For the reasons given below in Section 5, as presently drafted, the Joint Core Strategy fails the justified test

4.0 Twyford

- 4.1 Humphrey Farms Ltd own and operate the Northfields Mill site on the edge of Twyford, the general extent and location of which is shown edged red on the attached Plan 1. The site comprises a large feedmill, associated buildings and hard standing. It is acknowledged that the Mill, which is approximately 21m in height, detracts from the quality of the landscape (which is entirely within the National Park) and the amenities of nearby residents by virtue of traffic generation, noise and smells. It is nevertheless entirely lawful. The site is well connected to the village and relatively unconstrained (see Plans 2 & 3).
- 4.2 In 2010 outline planning permission was granted for the redevelopment of part of the site including the demolition of the Mill and associated buildings, the erection of a care home, childrens nursery and various employment generating uses.
- 4.3 The granting of this permission was contrary to policy but was considered by the Local Planning Authority to be appropriate because of the sustainable location of the site and the acknowledged environmental benefits achieved.
- 4.4 In its current form the permitted scheme is unlikely to be viable. Hence it is may be necessary to redevelop the site for a mixed use scheme comprising some residential (including affordable housing and possibly also sheltered housing) together with other uses including employment, open space and landscaping.
- 4.5 Humphrey Farms Ltd made representations at the pre-submission stage of the preparation of the Core Strategy. Those representations sought amendments to Policy MTRA3 so that the policy was more flexible and positively framed to allow for appropriate levels of housing growth in the third tier settlements.
- 4.6 Humphrey Farms Ltd are particularly concerned that the wording of Policy MTRA3 could eventually frustrate or limit the development potential of the site either in the context of a potential allocation or review of the settlement policy boundary in the Local Plan Part 2

(Development Management and Allocations Document). As currently drafted, the policy would frustrate the determination of a planning application with a housing element.

- 4.7 There is an acknowledged shortage of affordable housing in the Winchester District and particularly in Twyford. Humphrey Farms Ltd have a track record of making land available for, and delivering, affordable homes for local people in the area. A exception scheme of 15 units has recently been completed and is occupied (see attached article from Hampshire Chronicle at Appendix B). In 2010 the Parish Council carried out an assessment of suitable alternative sites for affordable housing in the village. No alternative sites came forward and land at Northfields Mill was the only location for new (affordable) housing in terms of availability, achievability and deliverability.
- 4.8 A detailed assessment of the suitability of the site and potentially viable development proposals should be considered in the context of the Local Plan Part 2 or potentially in a Neighbourhood Plan.
- 4.9 In consideration of the acknowledged need for new housing in Twyford and subsequent consideration of available opportunities for new development, it is considered that the land at Northfields Mill represents a logical and appropriate site for development. The site scores highly for the following reasons:
- The site is available, achievable and deliverable;
 - the site is well located to key facilities and services within the village;
 - the site is not constrained by Conservation Area or Listed Building designations;
 - the site is not in an area of flood risk;
 - the site is well screened by surrounding vegetation, landform and existing built form, and therefore would not have an adverse impact on the character and appearance of the South Downs National Park; and
 - the site is able to provide opportunities for housing (including much needed affordable housing), on site open space and landscaping.

5.0 Why is the Joint Core Strategy as presently drafted unsound?

- 5.1 The Joint Core Strategy as presently drafted is unsound as it does not represent the most appropriate strategy when considered against the reasonable alternatives.
- 5.2 At present, Twyford is identified as a settlement to which Policy MTRA 3 applies. The consequence of this is that new development would be limited to within the settlement boundary and to meet local needs only.
- 5.3 Twyford has successfully assimilated new development through infilling, redevelopment and intensification of sites within the defined Settlement Policy Boundary. But as the SHLAA map illustrates (see attached Appendix C) there are no identified further opportunities within the tightly drawn Settlement Policy Boundary. It is therefore unlikely that any further significant development will come forward from these sources within the Plan period to meet local need, to enhance and to maintain the vitality of the existing community. The Northfields Mill site is the only site outside the existing settlement boundary identified in the SHLAA which is previously developed land and relates well to the rest of the village. It is not of high environmental value. The Core Strategy should therefore encourage the effective use of reasonable alternative sites on the edge of accessible settlements.

- 5.4 The redevelopment of appropriate brownfield sites is entirely consistent with the policies and provisions of the NPPF. The NPPF seeks to conserve and enhance the special character of the National Park but in doing so allows for development in exceptional circumstances. The redevelopment of previously developed land on the edge of a highly accessible village to provide a small scale mixed use development (including affordable housing and the local employment opportunities) and which would secure landscape and environmental enhancements as a result of removing the existing operations which detract from the special character of the National Park, is clearly a form of sustainable development and should be considered as an exceptional circumstance. The Core Strategy should therefore in principle allow for such a redevelopment scheme, which would make a useful contribution to meeting the District's overall housing requirements.
- 5.5 As currently drafted MTRA3 is inconsistent with the National Planning Policy Framework for the following reasons:
1. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that guide how the presumption should be applied locally. Policy DS1 confirms that the use of previously developed land in accessible locations will be prioritised. But that priority is limited to sites within existing defined settlement policy boundaries by virtue of policy MTRA3. It is not reasonable to restrict sustainable development in other settlements where there may be opportunities to redevelop brownfield sites adjacent to existing settlement boundaries as is the case at Twyford.
 2. The NPPF requires that Local Planning Authorities should help to significantly improve the supply of new housing. To promote sustainable development in rural areas, housing should be located where it will enhance and maintain the vitality of rural communities. By restricting development to within existing defined boundaries, the Core Strategy will restrict development which could make a contribution to meeting the wider area's housing requirements, help sustain existing settlements and put to beneficial use brownfield sites.

6.0 What changes are required to make the Joint Core Strategy sound

- 6.1 In order to make the Joint Core Strategy sound MTRA3 should be amended to allow for redevelopment opportunities within or adjoining existing settlement boundaries.
- 6.2 In addition, the policy text (penultimate paragraph) has the potential to stifle development which could fail to meet the continuing needs of the Community over the plan period. The following statement which allows for greater flexibility should also be inserted:

“These could be identified through a Neighbourhood Plan or a developer led process which demonstrates some community benefit or support”

Appendix A

Plans 1-3 showing the Northfields Mill Site and its context

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CLIENT:
Humphrey Farms Ltd



PROJECT:
Northfields
Twyford

DRAWING:
Site Plan

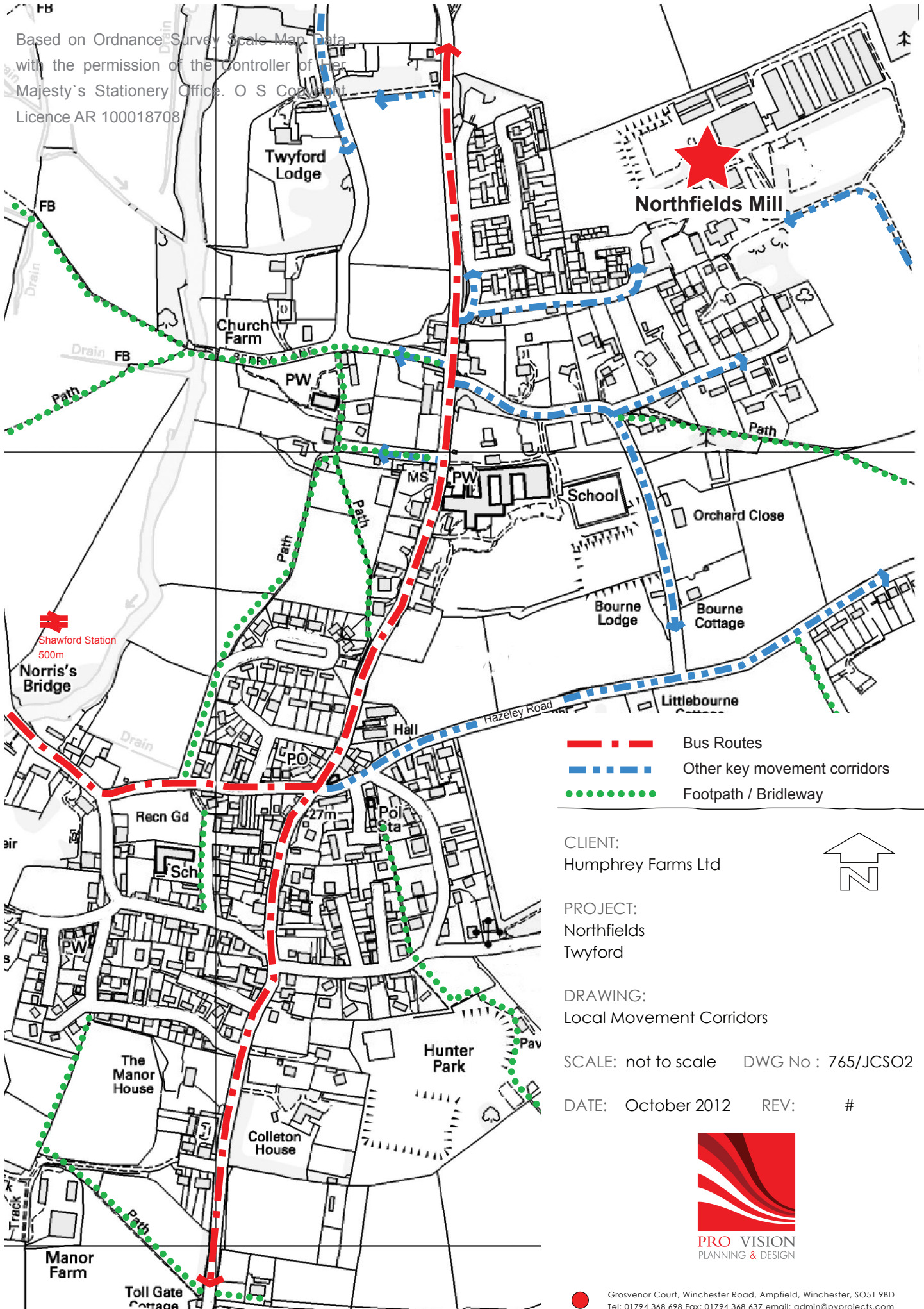
SCALE: 1/2500 @ A4 DWG No : 765/JCSO1

DATE: October 2012 REV: #



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Tel: 01794 368 698 Fax: 01794 368 637 email: admin@pvprojects.com
○ St Mary's House, 40 London Road, Newbury, RG14 1LA
Tel: 01635 40184 Fax: 01635 41459 email: admin@pvprojects.com

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- - - Bus Routes
- - - Other key movement corridors
- . . . Footpath / Bridleway

CLIENT:
Humphrey Farms Ltd



PROJECT:
Northfields
Twyford

DRAWING:
Local Movement Corridors

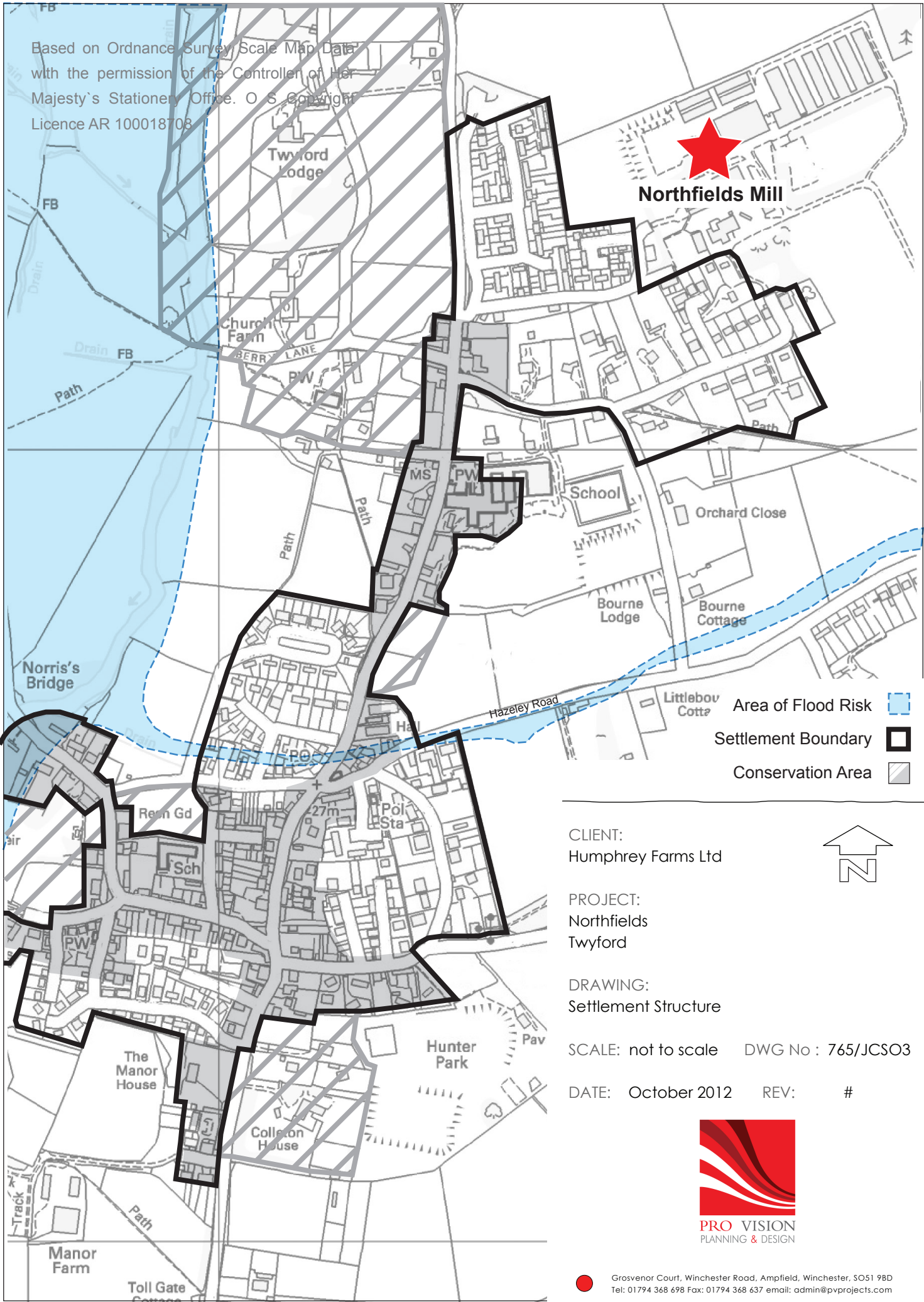
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DATE: October 2012 REV: #



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Northfields Mill

- Area of Flood Risk
- Settlement Boundary
- Conservation Area

CLIENT:
Humphrey Farms Ltd



PROJECT:
Northfields
Twyford

DRAWING:
Settlement Structure

SCALE: not to scale DWG No : 765/JCSO3

DATE: October 2012 REV: #



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Appendix B

Hampshire Chronicle article (28 September 2012)

Dream move back home for Twyford woman

9:00am Friday 28th September 2012

A **Winchester** woman has spoken of her delight at being able to move back to the village she was born in.

Anne Blake has returned to **Twyford** with her husband Peter after living in Winchester for the past few years.

She was able to come back home after securing a house in a new 15-home development.

Hewlett Close has been built by Hazeley Developments in partnership with the Hyde Group housing association, city council, parish council and Hampshire Alliance for Rural Affordable Housing (HARAH).

Anne was born in the village, attended the primary school, married Peter in St Mary's Church, and christened their children there too.

But after retiring from running Abbeyfield Care Home in the village she and Peter found they could not afford a house there and moved into a flat in Winchester.

Anne, 67, said: "We missed Twyford dreadfully as most of our lives had been Twyford, Twyford, Twyford.

"I didn't think I would ever get back here. Having been born here I wanted to die here but I thought the chances of that happening were zero and I still have to pinch myself that I'm back in this village and it's so lovely for me.

"When I walk to the post office or go to the doctor I always see someone I know along the way and my sister and brother live in the village too so they are just a few minutes' walk away."

Peter, 68, a retired taxi driver, added: "It's fantastic to be back and we feel at home. It's everything we wanted. We can even see our old house from here."

The development was built on a planning 'exception site' and went ahead on condition that Twyford families got first choice.

Mayor of Winchester Frank Pearson officially opened the development on Monday (Sept 24), also the beginning of national Rural Housing Week.




He said: "It is through Rural Housing Week that we need to raise the profile of the need for these small groups of exception housing in rural communities."

Back

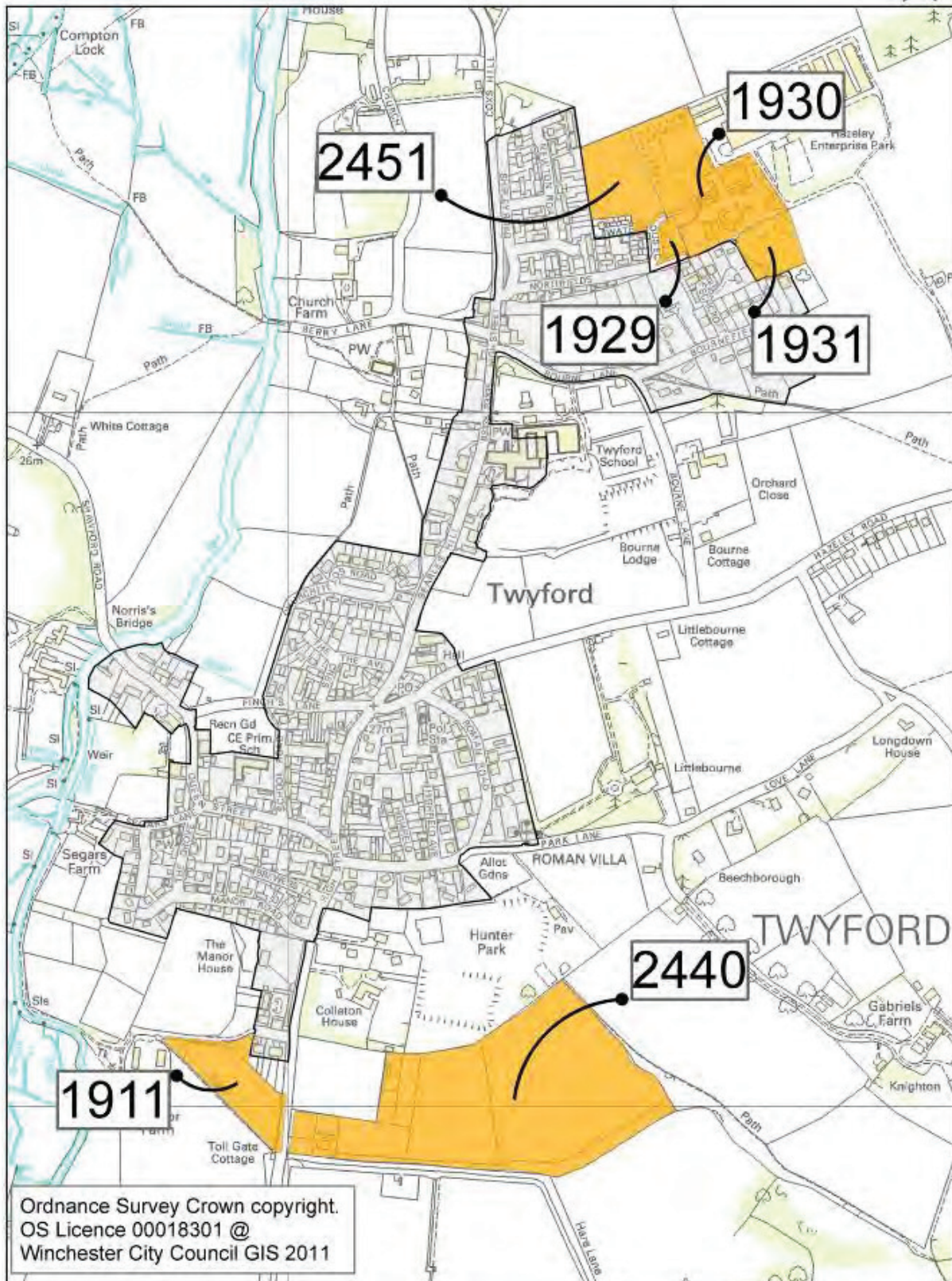
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Appendix C

Map extract of Twyford from latest SHLAA

-  Sites within Settlement Boundaries (Policy H3)
-  Sites within the Countryside
-  Settlement_Boundaries

Twyford



MAP 27 -TWYFORD