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Rosemary Moreton
Programme Officer
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20 December 2012

Our ref: 151070/JI

Dear Rosemary,

Winchester Joint District Local Plan Part 1
Post-examination modifications

On behalf of JS Bloor (Newbury) Ltd (participant 30104), thank you for the opportunity to comment on the council's proposed modifications following the examination hearings.

Modification 2.4 (Policy DS1):

We support the insertion of "about" although we consider that policy still leaves room for uncertainty. More appropriate, we consider, would be the words "a minimum of" or "at least".

While we can generally support the insertion of the word "about" in policy DS1, which gives more appropriate flexibility, we are still concerned that the overall figure for the MTRA of "about 1500" is misleading and liable to cause confusion for local communities, the development industry and other stakeholders.

The development strategy for the district (policy DS1 and paragraph 3.1) should be modified to state that "about" or "at least" 1700 homes are planned for the rural area, to be consistent with the ranges for the rural settlements set out in the MTRA policies.

Following this through, the plan would be consistent if the overall district figure was stated as "about" or "at least" 11,200 homes.

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Modification 2.20 (Policy MTRA2):

We generally support the insertion of the word "about" in front of the ranges of dwellings set out in the MTRA policies. This adds appropriate flexibility and better consistency with the NPPF. Our comments above regarding modification 2.4 also apply here i.e. there would be greater certainty with the use of "at least" or words to this effect.

In respect of Wickham we continue to contend that the JDLP is confused in regards to the appropriate provision for this settlement, which is recognised as a 'district centre', distinguishing it from the larger villages in the same range. The Plan remains silent on why this elevated status in the hierarchy is not reflected in the housing provision. Directing growth to the most sustainable locations is the purpose of the hierarchy, in line with the core planning principles of the NPPF.

Unless there are environmental or other constraints to justify constraining growth to the levels provided for the larger villages, which Part 1 of the Plan has not assessed in detail, the housing provision for this district centre should be higher, or at least directed towards the top end of the stated range.

In its response to Issue 8 before the examination, the council noted that capacity for growth in Wickham is likely to be constrained by the limited capacity of the waste water treatment works. The council also noted that Southern Water has plans to upgrade the capacity in 2017. Considering the plan period runs to 2031, it is right, therefore, that this issue should not be used to justify a lower housing provision.

Another issue, which featured in the examination hearings, that should be considered when determining the housing provision in this location, is the history of surface water flooding. The local pumping station has experienced problems leading to local flood events. This issue is more likely to be resolved through master planning and developer contributions if a suitable quantum of growth is directed to the settlement.

Other comments following the examination

We are disappointed that the council has not proposed any further modifications in respect of the development strategy for the rural settlements.

As we reiterated at the examination hearing, the council's evidence (the SHLAA) identifies that there is very limited capacity within the established boundaries of Wickham. Therefore, the level of growth proposed for this area will most likely rely on availability of land beyond the settlement boundary. However, paragraph 3.99 continues to hold back any extension to rural settlements until the adoption of

Local Plan Part 2. This does not accord with the provisions of paragraph 52 of the NPPF or the presumption in favour of sustainable development.

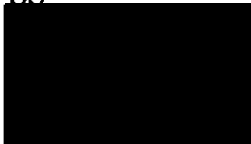
In the case of Wickham, this development strategy is likely to artificially constrain growth until beyond 2015, especially if there is any delay to adoption of Part 2. This is despite the council already having evidence of community support for some housing if it is directed to the north of the village, which emerged through the 'Blueprint' consultation exercise.

We understand the history behind the council's strategy of preparing a local plan in two parts. To be in accordance with the NPPF, and therefore sound, however, we consider that Part 1 should be amended with the effect that sustainable urban extensions could come forward ahead of the adoption of Part 2, where there is evidence of community support and confirmation of a lack of development capacity within existing boundaries.

We thank you again for this opportunity to comment on the JDLP and trust that our concerns regarding the soundness of the Plan will be given due consideration.

Yours sincerely,

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Jacqueline Mulliner
Director