

LPP2 EXAMINATION TOPICS

13th July 2016 hearing. Comments by John Hayter, resident of Bishops Waltham

Respondent 408914723

Matter 4:

Are policies DM6 - 12 reasonable and realistic, clear and consistent with national policies/guidance and do they establish suitable and appropriate criteria ?

DM6 *Town, District and Local Centres.*

- The policy confuses two separate requirements. Developments attracting large numbers of people are subject to the *town centres first approach* but are not necessarily the uses that define the policy boundaries of the primary (DM7) and secondary (DM8 Winchester only) shopping areas.
- Amend the first para to separate the requirements.
- The policy is not consistent with NPPF23 that requires to *set out policies for the management and growth of centres over the plan period*. DM6 does not provide for town centre growth and the allocations of appropriate edge of centre sites to enable such a policy to be effective have not been made.
- The latest evidence is the NLP 2014 Retail Study update para 1.1 of which states *Due to recent changes in population and the continued effects of the recession on retail expenditure levels and forecasts, NLP has been commissioned to undertake a partial update*.
- NLP 6.11 reflects this by reducing the Winchester need by 31% due to vacant premises and NLP 6.9 to 6.15 applies the same approach in the other settlements
- The Tables in NLP App 1 calculate the growth in "capacity" as population x spend/head. As 30% were vacant and population changes are small the 30% spend reduction could only come almost entirely from spend/head. App 2 Table 2B convenience and App 3 Table 1c for comparison spend/capita for 2013 is thus with 30% spare most of which is already back in use so that there should be a near 30% 2013 to 2018 jump instead of 1% in every zone.
- Evidence has to be consistent with the rest of LPP2 assumptions that do not assume even an existing recession which would also impact employment and delivery of housing 5 year supply.

- NPPF 23 defines the extent of designated town centres by primary and secondary frontages with LP policy defined town uses PLUS the wide range of office and leisure uses defined in bullet 6 forming the undesignated centre; also that sites should be allocated for that purpose if an assessment of need shows it is needed.
- NLP 5.6 argues that because there is limited space for this in the smaller settlements there is no requirement and hence does not consider the need for an allocation.
- NLP Tables only consider the need for convenience and comparison retail space.
- There is no assessment of the need for NPPF 23 bullet 6 provision.
- NPPF 23 requires provision for street markets. This and the increase of the café culture with tables on pavements and even small centres such as Wickham having indoor malls requires space need to be assessed not just by area but also by type to maximise distinctive character (NPPF 60) and leverage the existing heritage (NPPF 126)

DM7 Primary shopping frontage

- No comment

DM8 Secondary Shopping Frontage

- Only applies to Winchester.
- No Comment

No Policy for Local Centres similar to DM7 and DM8

DM9 Essential facilities and Services in the Countryside.

- The Plan does not define *countryside*. The definition is land outside defined settlement boundaries that includes many rural communities.

- No policy for pilot and permanent bio-mass, solar, wind or other renewable energy facilities, liquid, gaseous and solid mineral extraction, agricultural and sustainability education and research and telecommunications.

DM10 Housing for essential Rural Workers

- The Plan does not define *countryside*. The definition is land outside defined settlement boundaries that includes many rural communities.
- No other comment

DM11 Equestrian development

- No consideration of avoiding ground water pollution and offensive smells in the collection and disposal of animal waste products.
- Disposal should be to on or off-site bio-mass energy generation.

DM12 Leisure and Recreation in the Countryside.

Add new criteria:

- The development should be sited where the other criteria can best be met

- Public access to the land and its enjoyment is not degraded when assessed against criteria i) and iii)
- Walking and cycling links to the nearest such routes or settlement are provided. A contribution may be required.
- Marquees are used where the frequency and type of use is such that permanent development is not essential.