

**Winchester District LPP2 – Public Examination**  
**Hearing Day 4 – 18 July (PM) New Alresford – Matter 9: Policies NA1-NA3**  
**Response by Robert Fowler**

**Introduction**

- 1 My view is that Winchester District Local Plan Part 2 (LPP2) is **Unsound** with regard to policies (NA1 – 3) for New Alresford. My reasons for this view are fully explained in my comments (723646458) on the Pre-Submission Plan December 2015 with my main points summarised below for additional clarity.
- 2 This Statement explains my reasons for stating that the Plan is **Unsound** in key areas and my proposals for improvement.
- 3 By distributing housing developments around the periphery of the town a workable Plan could be achieved and meet all the housing targets in LPP1. In taking this view I support the submissions of the Alresford Professional Group.

**General effect of new proposals in the LPP2 Submission Plan**

- 4 Proposals by Winchester City Council will allow housing and industry to break out of the confines of the existing settlement boundaries and build on good productive grade 3a agriculture land at Sun Hill. Many believe that a careful and objective view of the alternatives was not made by WCC during their Site Selection process which omitted other suitable development sites at the Avenue (site 2552) and New Farm Rd (Sites 2553 & 1927). See Appendix A for explanation.
- 5 These alternative sites do not involve building on farmland and in fact would utilise land that is currently lying dormant.
- 6 Because the Proposed Policy was developed using faulty selection Methodology it is not founded on a robust evidence base and I therefore consider that this is reason why public have **not** seen the Plan as **Justified**. See Appendix A.

**Critique of the New Alresford Plan Part 4.5 (Relevant paragraph numbers refer)**

- 7 The plan concentrates the housing allocation in two locations. Site 277 is allocated 325 houses on prime grade (3a) agriculture land outside the

Settlement boundary.

The other site proposed at the Dean is for 75 dwellings to be delivered piecemeal on small multiple sites. It cannot be conceived that the main objectives in its Key policies can be achieved i.e.:-These are to “promote the vitality and viability and maintain the rural character and individuality of this small, historic market town.” (NPPF 58) The Plan does not meet the criteria set by itself in its key policies and is therefore **Unsound**.

- 8 Para 4.5.3 Is completely erroneous. It alleges that the development is of an appropriate scale and will result in a more Sustainable Community. This is not true.

New Alresford as described in WCC's own documents is a relatively *isolated* market town. The addition of 500 dwellings (now reduced to about 400) into a town with a total housing stock of 2400 is totally out of proportion and to integrate the new inhabitants will take great deal of effort.

Placing 325 dwellings outside the settlement and poorly connected to the existing Town Centre cannot be described as a 'Sustainable' Development. There is a strong possibility that any large development on this site will become a separate isolated community. The majority of the residents will live at least one kilometre from the Town centre. The fact that the main development is all in one place shows that it is not proportionate and will not preserve the settlement's identity or Community. This situation will be exaggerated because the new development will be connected directly to the local Bypass via Sun Lane which will only increase its isolation.

- 9 Para 4.5.7 & 4.5.8. These paragraph implies that the selection of sites has taken into account work by various 'Needs Groups' This is not true. The early series of Needs Groups Reports did not take into account much of the available evidence on Population, Employment or Infrastructure. Although revised reports were written and endorsed by the new Town Council with different conclusions, these have either been dismissed or ignored by WCC. See Appendix B
- 10 The site Selection Methodology adopted by WCC's Housing Site Methodology of 2014 is strongly criticised and disputed. See Appendix A. It should have been completely revisited to take into account realistic criteria. Because of this, the

Policy has not been **Objectively Assessed** and has therefore not been **Positively Prepared**.

- 11 NA3 Para 4.5.12 The ability to locate all development on one site should not be a criteria for site selection as this discriminates against the smaller sites which in total could make up the required allocation.

#### **NA1 - Car Park Provision**

- 12 This Policy proposes a 50 to 100 space car park in the Dean either for purchase or lease by WCC. This is completely unrealistic in view of the state of public finances. The nature of the Dean redevelopment is that it is in multiple ownerships and leaseholds. It is therefore not possible to produce a complete and overall Masterplan under one single developer. Two of the major sites, Warwick Trailers and Huxleys have come forward with plans to develop the land for care homes and market housing all with limited car parking. It is therefore highly unlikely that land will be available for car parking when prices encourage owners to build housing. It is estimated that a public car park for 100 cars would occupy 20% of a Hectare. With housing densities commonly reaching of 32 per Ha, up to 6 dwellings would be forfeited by the developers with a consequent loss of profit.
- 13 The efficacy of locating a new car park in the Dean is also questioned. Already the traffic movements at the Dean /West Street Cross roads are very high and additional parking together with new housing (75 units) will exacerbate the situation. This 4-way junction is already difficult in peak hours will become more of a safety issue with extra traffic in the Dean, probably necessitating traffic lights which will have a detrimental effect on traffic flows throughout the Town and spoil its character.  
It is recognised that Alresford has a serious problem with car parking space but not enough has been done to re-organise generous free street parking with 2 hour time slots. WCC Policy Winchester District car parking strategy 2014 does not cover or examine the effect of revising street parking in Alresford Town. Again WCC have demonstrated that this subject area has not been fully examined and the Policy Comment that “**An additional 50-100 public parking spaces are proposed.....or through other opportunities which may arise and will be assessed against relevant policies of the Plan.**” indicates that

the outcome of this plan is **unclear**, risky and may never come to fruition because it will be **Undeliverable**.

I therefore consider that the car parking policy for the Dean in NA1 is **Unsound**.

- 14 If, as expected, additional street parking demand will be generated by new high density housing the existing parking situation will only be made worse. Potential loss of Station and Perins leased car parks will also add to the uncertainty. In this case it would be better to insist that developers incorporate a generous allowance into their layout designs, obviating the need for a public parking area, see para 22 below.
- 15 Other parking solutions exist. Spaces may become available in a new development at the Avenue next to the Town Offices on site 2552.

#### **NA2 – The Dean Housing Allocation**

- 16 I consider that this policy is **Unsound**. NA2 Policy is not **consistent** in that the proposed redevelopment of the Dean is not in accordance with the NPPF concerning the need to enhance the commercial vibrancy of town centres. (NPPF 22) It jeopardises existing employment in a sustainable location that is supportive of the town centre. (NPPF 9) It is further inconsistent with Winchester Local Plan Part 1 in that the strategy for Alresford will have a detrimental effect on its character.
- 17 It is also inconsistent at Paragraph 4.5.15 which states that “**....making it well suited to the provision of housing for the elderly.**” and paragraph 4.5.16 which states that “**There is a need to maintain and increase employment levels in Alresford .....and ensure that Alresford remains a working town**”. Allowing all the development land to be converted to housing will have detrimental effect on employment levels and the economy of the town, especially the retail centre. (NPPF 37)
- 18 NA2 is not **Effective** because the Dean employment land is covered in multiple ownerships and leaseholders. Common sense and experience tells us that no developer will produce an overall Masterplan as it is not in their interest. See para 12 above) The Policy was therefore not based on credible evidence and

thus is **Not Justified**.

- 19 The policy proposes that Open space is to be provided by the developers in addition to a local equipped play area. This is completely unrealistic & impractical for a multiple number of different developers to provide these facilities. Open space in the built up area close to the Town centre seems inappropriate when Alrebury Park is adjacent. What is needed are pathways leading to the existing play areas.
- 20 The proposals for Open Space in the Dean are therefore not **Justified** and it would be better for the existing facilities to be enhanced. I propose the following amendments to the Policy NA2: The first sentence should read
- 21 **'Land at the Dean, as shown on the Policies Map, is allocated for the development of a maximum of 75 dwellings and commercial uses.'**  
 The first bullet point starting '- a Master Plan ...' should be deleted  
 Under '**Environmental**' the bullet point starting ' - provide on site Open Space....' should be deleted.  
 Insert '**Enhance existing facilities in Arlebury recreation park**'  
 Under '**Other Infrastructure**' the bullet point '-include provision for a public car park....' should be deleted.  
 Insert new bullet point '- **Developers should include sufficient car parking space to enable occupiers and visitors to avoid using street parking**'

### **NA3 – Sun Lane Mixed Use Allocation**

- 22 I consider that the proposed allocation of 325 houses on Site 277 at Sun lane is **Unsound**. There are many reasons, including but not limited to, social isolation, traffic problems and Landscape diminution.
- 23 **Employment Land**  
 The Plan allocates 5 Hectares for employment land when there is no proven demand and existing business do not wish to relocate to the remote site at the edge of town. A recent marketing campaign by London Clancy property agents, on behalf of the developer demonstrates that he can see little take up. Studies by the APG have indicated that there is no demand for this Employment site and “expressions of interest” mean nothing. WCC have not **“Taken into full**

**account of the relevant market and economic signals”** (NPPF 158) I therefore consider that the Plan is not **Positively Prepared**.

24 I consider that the location of the Employment Zone well away from the M3 and A34 road networks would preclude its successful leasing and cheaper office premises will exist locally in preferred places.

25 **Site Access from the A31**

The NA3 Policy states that there is a need for an access via a new junction onto the A31 to service the 5 Hectare Employment Zone. It is logical therefore that if there is no demand for the Employment Zone a new junction is not required. Studies carried out by the Alresford Employment Needs Group have shown that the main employment growth for a managerial/supervisory workforce, which is typical of Alresford, will be in self employment. (This trend has recently been highlighted by the ONS see Appendix D.) Thus there is little or no demand for physical buildings, especially when there are millions of square feet of commercial space available in the area. Therefore the Policy is not **Justified**.

26 The proposed 3 way only junction is also intended to provide indirect access via Sun Lane to the new site of 325 houses but there is considerable professional opinion that:-

- a) the 3 way only Junction cannot be built to Highway standards:
- b) without an 'On Slip' from the East the efficacy of its design will be diminished:
- c) re-routing most traffic from the new housing site away from the Town Centre will cause local residents to consume more fuel and exacerbate CO2 & NOx pollution (NPPF.29,30 & 37):
- d) Considerable damage will be caused to the environment in terms of noise, loss of landscaping and visual amenity. Local residents and grade 2 listed buildings in Tichborne Down and Sun Lane will suffer when the embankments are removed, the carriageway is widened and slip roads are constructed nearby. The settings of the listed buildings would be harmed and their legal protection must be considered. Flooding problems which already exist in Whitehill Lane will be exacerbated by the building of new roads and concreting over the adjacent fields. This will worsen flooding for the nearby houses.

27 I therefore contend that in respect of the proposed A31 junction the Plan is

**Unsound** because it is unjustified and not proven. It is also not **Effective** because no evidence is available to demonstrate that the junction can be constructed. Furthermore the Highway Authority (HCC) have not approved the design and are reserving the right to do so until detailed plans have been received. In view of the expert opinion available this makes the whole Site and NA3 policy entirely risky. Delaying assessments for a strategic Junction such as one onto the A31 to a later date in the planning process without knowing if it can be constructed is surely an unacceptable practice. The Plan is **Not Effective** as it is not known if the junction can be delivered

28 **Traffic Impact**

The new employment Zone is located over 1,000 metres from the Town centre and thus is not sustainable. There are no public transport routes into Town from there and employees would need to visit the Town Centre for meals and shopping. This would create extra traffic problems not addressed by the SYSTRA report. In respect of the Employment zone I consider it unjustified for the reasons stated above.

29 It is acknowledged in the SYSTRA report that significant movements of traffic will be generated from the Employment Zone if built. A critique of the Systra report is contained in the Appendix C.

30 If the proposed restrictions to exit Sun Lane North are implemented then most of the existing and new housing traffic will be diverted through Nursery Road. (See Appendix C. Proposed one way working at Sun Lane North and calming restrictions through Nursery Road will leave the residents little choice other than to take motorised transport into the centre. This will be true also for the new inhabitants of the 325 houses on Site 277. Additionally its should be noted that due to the geography of the town there is no practical solution to ease traffic movements across Alresford to the North, with every movement having to enter Broad Street. Thus a properly developed Transport Plan is essential to any new development in Alresford. At the moment this does not exist in the Public realm

31 **Alternative Access**

One solution to the traffic movements problem created by housing on site 277 is for an alternative new road from site 277 routed along side the railway track and

exiting North East on the B3407 Alresford to Bishops Sutton Road. (This was the main A31 before the Alresford bypass was built) It has a number of advantages:

- it is cheaper than the proposed A31 junction;
- it is less obtrusive to the landscape and environment
- It allows traffic to exit the new housing development without jeopardising the safety of other road users, pedestrians and school children in Nursery Road and Sun Lane
- It reduces the traffic impact on Sun Lane and Tichborne Down;
- Allows Sun Lane North Exit to be closed for safety and provides a safe access into Alresford Town.
- It is understood that the Landowner in question also supports this alternative route.

32 The existing policy is not considered **Sound** because it did not give enough weight to this proposed alternative access route to the B3047. SYSTRA claim that this route would be underused and would not divert traffic because drivers travelling to work would use the new A31 Junction. But this is disputed. See Appendix C:

33 **Mitigation of Traffic Impact**

As stated above I have no objection to new housing being built in Alresford. However, I recognise that in order to meet the housing targets of LPP1 some housing will be necessary on site 277. In view of the issues mentioned above, (Traffic, connectivity and sustainability) it would be more sensible to locate fewer houses on Sun Hill and more on the Avenue where it be closer to the town's facilities and more sustainable.

34 I would propose to modify the NA3 Policy as follows:

**“Land east of Sun Lane, as shown on the Policies Map, is allocated for 5 hectares of residential development (about 160 dwellings), and 15 hectares of informal and recreational open space and a burial ground.”**

35 The remainder of the Policy is generally acceptable with the deletion of all wording related to Employment land, the A31 junction and access

36 Additional Wording is required to permit access to and from the site from the

B3047 using a new road alongside the Railway track.

37 In order to make good the shortfall of housing due to reduced allocation at site 277, I propose that land is allocated at two other omitted sites at the Avenue 2522 and New Farm Road (1927 & 2553) These two sites could make up the difference as follows:

The Avenue with 65 units and New Farm Road with 60 units. These sites have been proposed in submissions by their developers (213111848 and (322761455)