

**EXAMINATION OF THE WINCHESTER DISTRICT LOCAL PLAN PART 2:  
DEVELOPMENT MANAGEMENT AND SITE ALLOCATIONS**

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**EXAMINATION STATEMENT ON BEHALF OF SOUTHCOTT HOMES LIMITED (Rep 50232)**

*Matter 9 – New Alresford*

*Monday 18 July 2016*

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Director*

June 2016

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### 1. Introduction

- 1.1 This Examination Statement provides a response on behalf of Southcott Homes Limited, to those Questions raised by the Inspector (dated 06 June 2016), prior to the hearing session on the afternoon of Monday 18 July 2016, relating to New Alresford contained within Winchester District Council's Proposed Submission Local Plan Part 2: Development Management and Site Allocations 2015 ("LPP2").
- 1.2 In addition to the above, this Statement specifically highlights which areas of the Plan are considered to be unsound, and the basis upon which it fails the tests of soundness, and the changes sought.

### 2. Matter 9 – New Alresford

*Question i) Are the policies and proposals for growth and change in this area appropriate and justified, including in relation to the NPPF, and in terms of environmental, economic and social impacts?*

- 2.1 In short the policies and proposals for growth and change in relation to New Alresford are not appropriate and justified particularly in terms of the environmental, economic and social impacts, which together comprise the three dimensions of sustainable development.
- 2.2 As Southcott Homes has already conveyed in its representations to the pre-submission draft version of the plan in December 2015 the development strategy that the Council has pursued in relation to New Alresford is inflexible and ignores not only the community opinion but also the Council's own evidence base.
- 2.3 This Statement therefore seeks to elaborate upon those concerns in turn below.
- (i) Lack of regard for public opinion*
- 2.4 The Council's development strategy is not well supported by the local community as evidenced by the fact that a group of local professionals has prepared an alternative plan for New Alresford to address the significant shortcomings in the Council's approach.
- 2.5 Whilst the Council was provided with a copy of the alternative plan for New Alresford at an early stage it has failed to properly consider its content as a viable alternative to the strategy pursued in the pre-submission draft version of the Plan.

- 2.6 As a consequence the significant shortcomings in the Council's approach remain in the submission version of the Plan, which include:
- The conflict between releasing The Dean for housing and the relocation of the existing business premises;
  - The need for a new access onto the A31 New Alresford bypass as a prerequisite to the delivery of housing on the Sun Lane site; and,
  - Reliance upon a single strand housing delivery strategy that only plans to meet the exact dwelling allocation of 500 dwellings without any margin for error.
- 2.7 Whilst public opinion comprises only one component of the evidence base for the Council to consider in this instance the community of New Alresford includes a number of experienced professionals who have progressed a cohesive alternative to the Council's strategy, which has itself been the subject of separate public consultation.
- 2.8 The Council's failure to give proper regard to the alternative plan for the settlement is symptomatic of its desire to push ahead with a single strand strategy without properly assessing the alternatives, based on proportionate evidence. As a consequence the Council has not selected the most appropriate strategy and this section of the Plan cannot be considered justified under the terms of Paragraph 182 of the Framework.
- (ii) Inflexible Strategy*
- 2.9 The Local Plan Part 1 ("LPP1") sets out a dwelling requirement of about 500 dwellings to be provided in New Alresford over the period 2011 – 2031 (Policy MTRA2). The table at paragraph 4.5.4 of the LPP2 confirms the Council has approximately 100 dwellings identified within New Alresford comprising net completions, outstanding permissions and SHLAA sites from within the urban area. This leaves a balance of about 400 dwellings to be allocated.
- 2.10 The draft allocations for New Alresford centred on Sun Lane total 400 dwellings exactly.
- 2.11 Firstly, the Local Plan Part 1 identifies a requirement for about 12,500 dwellings based on the Winchester District Strategic Market Assessment 2012. The expression about indicates that the figure should not be treated as a ceiling, which in the context of the Government objective to significantly boost the supply of new housing nationally, must be the correct interpretation.
- 2.12 The Council's approach for New Alresford to therefore seek to allocate exactly 400 dwellings to meet the requirement of 'about 400 dwellings' principally in a single location is therefore inherently inflexible.
- 2.13 This is particularly the case if as was set out in Southcott Homes' representations to the pre-submission draft version of the plan there are inherent problems in the delivery of the Sun Lane site such that its ability to deliver the total number of dwellings sought over the plan period must be called into question.

- 2.14 The Council's strategy is not therefore positively prepared nor is it effective in terms of meeting the total housing requirement for the settlement and allowing for any potential slippage or under provision.
- 2.15 This is particularly important given the significant need for affordable housing across the District and the consequent importance of delivering the planned requirement to meet the needs of the most vulnerable members of the community.
- (iii) Failure to Have Proper Regard to the Council's Own Evidence Base*
- 2.16 The evidence base that supports the pre-submission draft version of the Plan is led by the Sustainability Appraisal (SA) dated September 2015.
- 2.17 This document is extensive in terms of its detail and runs to some 644 pages. The SA gives consideration to the strategy progressed by the Council and also the alternative site options presented by promoters.
- 2.18 In the case of New Alresford the SA does not reach a specific conclusion that the Council's preferred strategy comprises the most sustainable option. Indeed it does identify a number of issues in terms of the proposed allocation sites in terms of, for example, contamination, biodiversity and, noise.
- 2.19 With regard to alternative sites such as Land at New Farm Road it is notable that the conclusions set out in Appendix VIII on Page VIII-20 of the document do not identify this site under the heading of 'Key Negative Effects'.
- 2.20 The conclusions set out in Appendix VIII expressly confirm the following 'Key Positive Effects' of the alternative strategy put forward by the APG, which includes Land at New Farm Road:
- The strategy could deliver up to 25 ha of new open space to contribute to addressing the identified shortfall;
  - The wider dispersal of development across the settlement could reduce the extent of potential negative effects on the local roads and congestion; and,
  - All site options can deliver high quality housing to meet local needs.
- 2.21 The Council's evidence base that is led by its SA does not expressly state that its preferred strategy is the most sustainable option. Furthermore the SA confirms a number of key benefits to be derived from the alternative plan and sites such as Land at New Farm Road do not feature under the heading of 'Key Negative Effects'.
- 2.22 Taking these points together with the fact that the Council's strategy does not seek to allocate any additional land to provide flexibility in the delivery of housing to meet the needs of New Alresford it is clear that the Council has failed to have proper regard to its own evidence base.
- 2.23 As a consequence the Plan has not been positively prepared, is not justified, nor effective and as is not therefore consistent with national policy and in particular Paragraph 182 of the Framework.

(iv) *The Allocation of Land at New Farm Road*

- 2.24 The Council could address the shortcomings in the current Plan strategy for New Alresford by either exploring an alternative that follows the APG approach or by seeking to allocate further land beyond that already identified to ensure the Plan is sufficiently flexible to respond to change.
- 2.25 Under either scenario the allocation of Land at New Farm Road for approximately 50 dwellings (Site Ref: 2553) would assist to provide a robust housing delivery strategy for the settlement.
- 2.26 Southcott Homes has already provided detail on the deliverability of the site through its Informal Submission document (dated July 2015) and then subsequently its representations submitted in December 2015.
- 2.27 The purpose of this sub-section of the Statement is to address a number of points made by the Council in its appraisal of the site and to reaffirm its suitability, availability and achievability as a sustainable location for accommodating a modest level of housing in New Alresford.
- 2.28 **Landscape Impact:** The Council's assessment of the site suggests that housing development would give rise to an unacceptable landscape impact. It is clear from the Landscape and visual appraisal undertaken by Southcott Homes' landscape architect Tyler Grange that the site is only visible in the landscape on a localised level. Any adverse impact on the landscape would therefore be localised and viewed in the context of the settlement that wraps around the site.
- 2.29 The conclusions drawn by the Council on the matter of landscape impact are not based on the site-specific landscape and visual appraisal and as a consequence the Council wrongly attributes harm in relation to this matter.
- 2.30 **Access:** The Council has suggested that vehicular access to the site is not possible. This is incorrect. Southcott Homes highway engineer (RBM) has reviewed the site access arrangements and confirms that an adequate vehicular access can be achieved to the site in the manner and position proposed and in accordance with the requirements of Manual for Streets ("MfS").
- 2.31 **Accessibility to Services and Facilities:** The site is accessible by modes other than the private car to the key local services and facilities within New Alresford. Whilst the site may not be as close as some other locations the travel distances remain acceptable (see Informal Submission document at Page 15).
- 2.32 Taking the above points into account alongside the evidence already provided by Southcott Homes it is clear that Land at New Farm Road comprises a suitable location immediately adjacent to a sustainable settlement where a modest scale of residential development can be delivered in a sustainable manner that accords with all three strands as set out in Paragraph 7 of the Framework.
- 2.33 The site should be allocated to provide flexibility in the development strategy for New Alresford whether or not the Council's current strategy remains intact.

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

2.34 In short Southcott Homes does not consider the policies and proposals to be clear and deliverable for the following primary reasons:

1. The proposed allocation at The Dean (Policy NA2) seeks about 75 dwellings, commercial and parking uses on the land. This site is in multiple ownerships all with competing requirements. Whilst it is possible that the residential component of the allocation may come forward it is considered unlikely that any commercial or parking uses will be delivered. This view is evidenced by the fact that parts of the site are already progressing with separate developers none of whom are proposing any commercial or public car parking.
2. Sun Lane comprises the majority of the housing requirement for the settlement and is predicated on the delivery of a new access onto the A31, which itself is triggered by the provision of new employment development on the site.

Southcott Homes' highway engineer concludes that insufficient evidence has been provided by the Council to demonstrate with any real degree of certainty that the access to the Sun Lane site via the A31 can and will be delivered. Given that the Council's development strategy is heavily reliant upon this site the lack of evidence to demonstrate the capability of the access proposals to come forward represents a significant shortcoming in the Council's evidence base.

It would therefore appear that the delivery of the new access is highly questionable and as a consequence the Sun Lane allocation site would not be able to deliver the level of housing required under the terms of the draft allocation.

If the draft allocation fails to meet the necessary housing requirement the absence of any further allocations means that the Plan will in turn fail to deliver the required housing in New Alresford.

2.35 As a consequence this section of the Plan is not positively prepared, justified by the evidence, effective in terms of delivery and consistent with the Framework.

### 3. Changes Sought

3.1 In order to ensure the soundness of the plan, the following specific options are proposed by Southcott Homes:

- 1) Direct the Council to properly consider all reasonable alternative strategies in terms of the delivery of housing in New Alresford having regard to the APG proposal and other options for site selection, including a thorough review of the sustainability appraisal process; or,

- 2) Recommend that the Council increase the number of proposed allocations in New Alresford to positively plan for the future needs of the District and ensure a flexible and responsive supply of housing land. In this respect Land at New Farm Road comprises a suitable, available and achievable site that the Council does not identify any 'key negative effects' from in its SA.
  
  - 3.2 An Amendment to the policies map to identify the specific area of land at New Farm Road proposed in this Statement for allocation is attached at Appendix 1.
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# Appendix 1:

## Proposed Changes to Policies Map

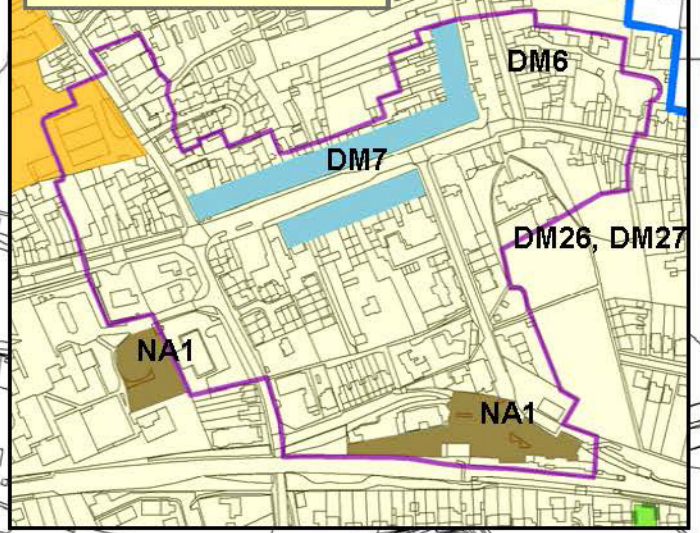
# Winchester City Council Policies Map

## Map 10 New Alresford

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Ordnance Survey 100019531



### Town Centre Inset Map



Proposed Allocation  
of New Farm Road

