

WINCHESTER LOCAL PLAN PART 2 MATTERS STATEMENTS

MATTERS 12/13 – POLICIES WK1 TO WK3

BLOOR HOMES (REPRESENTOR 51466)

21 JUNE 2016



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Wickham – Policies WK1 to WK3

Matters 12/13

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

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

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1. Introduction

- 1.1 This representation is made on behalf of Bloor Homes, who has an interest in land at Mill Lane, Wickham. We have sought to avoid unnecessary detail from previous representations, and instead focus on changes in the planning context since previous submissions were made, and how these affect our conclusions about the soundness of the submitted plan.
- 1.2 Changes in the relevant planning context are the submitted planning applications for the proposed allocations at Winchester Road (Bewley homes) and The Glebe (Croudace).
- 1.3 In summary, this additional representation is submitted to clarify that:
- The proposed development strategy is not the most sustainable option when considering the available alternatives. As submitted, the strategy will miss the opportunity to promote sustainable travel and encourage healthy lifestyles therefore is not consistent with national policy and guidance.
 - The proposed development strategy will not deliver the infrastructure requirements that are set out in the policy
 - The logical solution to the deficiencies with the development strategy is to include land at Mill Lane (SHLAA site 1908) with the Winchester Road allocation (SHLAA site 1909), either in place of, or in addition to, the proposed allocation at The Glebe (SHLAA site 2438).
- 1.4 Therefore, the answer to the two questions for the hearing are, in our opinion, clearly 'no'.

2. Planning applications at Winchester Road

- 2.1 A detailed planning application has been submitted by Bewley Homes for development of 100 homes on the Winchester Road site identified under policy WK2 (application 15/01980/FUL). This is 25 homes fewer than the proposed allocation, on the basis of pre-application advice given to the applicant, we understand, to the effect that the Bewley's alternative scheme for 125 homes was too dense for this edge of village location (largely due to the predominance of larger family homes). Bewley's proposed solution is the extension of the allocated site eastwards towards the land controlled by Bloor, and this is subject to a separate detailed application for 25 homes (application 15/01981/FUL).
- 2.2 We note that both applications have yet to be determined or presented to planning committee at the time of writing, some 10 months since they were submitted. Our understanding is that drainage issues in the village and the publication of a multi-agency report to identify village wide solutions are one of the main factors delaying the applications. We have addressed the drainage issue in our representations on the draft LPP2 (December 2014).
- 2.3 Winchester City Council's (WCC's) urban design officer commented, on 19 November 2015, that further information was needed regarding off-site

connections to integrate the proposed development with the existing urban area and the new sports pitches on Mill Lane. The officer notes that a positive aspect of the proposal was the provision of a new footpath connection from the site, but that this did not connect with the local community facilities (school, doctors surgery and community centre). The applications propose access through The Spur/The Circle, an existing residential estate, then adjoining residential roads in a convoluted route to the community facilities (please refer to page 8 of the design and access statement submitted with the scheme for 100 homes, and page 4 of the design and access statement submitted with the scheme for 25 homes, which are appended).

- 2.4 This proposed access arrangement would result in the new residents needing to walk away from the neighbouring community facilities, and new sports pitches, through a series of residential roads, to access this key local destination. This is clearly at odds with the principles of the NPPF to manage growth to discourage car use and reduce traffic (NPPF paragraph 17, bullet eleven).
- 2.5 Representations on LPP2 on behalf of Bewley Homes submitted since the applications were registered, state that the proposed allocation under policy WK2 is insufficient in space to provide allotments and children's play areas. Bewley is seeking amendment of the policy to remove the requirement for this infrastructure.
- 2.6 While the examination of part of a development plan is not normally the place to comment on specific development proposals, in this case, given that applications have been submitted in advance of the LPP2 examination, it is relevant to recognise the shortcomings of the Wickham development strategy exposed by the technical difficulties that have contributed to the delay in determining these applications. The Bewley applications expose the difficulties of integrating the Winchester Road allocation with the existing village, and the lack of direct access to the community facilities, which are otherwise within very comfortable walking distance. They also expose the difficulties in delivering the supporting infrastructure within the confined land area included in the proposed allocation.
- 2.7 Inclusion of land at Mill Lane in the LPP2 allocation is the obvious solution. Not only would this provide more land to the north of the village to allow for provision of play space and allotments to sustain the new residents, it would provide the means to directly access the community facilities and the new sports pitches. Therefore, inclusion of Mill Lane in the development strategy would give an optimal master planned extension to the village, consistent with the principle of paragraph 52 of the NPPF and the core principle of actively managing patterns of growth to promote sustainable travel and encourage healthy lifestyles, (NPPF paragraph 17), objectives that are elaborated in the national guidance, for example in regard to the requirement for, and objectives of, transport evidence to support local plans (NPPG Reference ID: 54-002-20141010) and planning for healthy communities (NPPG Reference ID: 53-005-20140306).
- 2.8 Without the direct access provided by the Mill Lane site, the proposed contributions from Bewley towards the sports pitches through S106 should fail

the CIL Regulations¹ as the pitches would be not be directly related to the Winchester Road development and the needs it would generate. Please refer to the representation made by Bloor on the Bewley application, which is appended for ease of reference.

- 2.9 We also note from representations from Bewley that they will be unable to fund the complete delivery of the sport pitches. The obvious planning solution is again to include the land at Mill Lane in the development strategy. Not only does this provide a direct relationship between the new housing and the new sports pitches, but it is likely to increase the available developer contributions for the new pitches, thereby reducing the need for public subsidy to deliver this existing local plan commitment.
- 2.10 In summary, therefore, and being consistent with previous representations made by Bloor, and in the absence of any overriding technical or policy constraints, a more logical solution to limitations of the submitted WK2 site allocation, would be to allocate land at Mill Lane with the land at Winchester Road. The southern portion of site 1908 (south of the existing hedgerow boundary) could be developed for housing and land north of this boundary designated as informal open space. There would be clear planning benefits to including this site in the development strategy, which was one of the three sites short-listed by WCC for detailed consideration during the LPP2 consultation, namely:
- 1) Provision of sufficient land to the north of the village to enable a high quality and master planned extension to the village, including informal public space, play areas and allotments in line with the principles of the NPPF (paragraph 52)
 - 2) The ability to provide direct non-vehicle access between the new homes and the existing community facilities, thereby significantly improving the prospect of walking and cycling, consistent with national policy and guidance objectives (NPPF paragraph 17)
 - 3) Providing direct non-vehicle access to the new formal sports pitches at Mill Lane, which would otherwise require protracted routes that could encourage, rather than discourage, car traffic, which would be in conflict with national policy
 - 4) Assist in delivering the new sports pitches and supporting facilities at Mill Lane through developer contributions, limiting the need for public subsidy.

3. Planning application at The Glebe

- 3.1 An outline planning application by Croudace has been submitted for the development of the WK3 site prior to the examination.
- 3.2 Application 15/02523/OUT is yet to be determined despite having been registered in November 2015.
- 3.3 Submission of the application does not confirm that the allocation of land at The Glebe is the most sustainable option for Wickham's development strategy.

¹ Community Infrastructure Levy 2010; Regulation 122 (2)

- 3.4 Previous representations on behalf of Bloor Homes through the plan making process have set out in detail the comparative disadvantages of allocating The Glebe over the alternative allocation of land at Mill Lane. We do not wish to unnecessarily repeat the arguments for an allocation at Mill Lane other than to reiterate that the main point: proximity to the existing community facilities, including village school and doctors surgery, and its critical importance to the non-vehicle access for the Winchester Road allocation, is an overwhelming advantage in favour of SHLAA site 1908. We conclude that it has been overlooked simply in an effort by WCC to respond to the parish council's original preference for a dispersed strategy (over multiple sites).
- 3.5 While it is admirable that WCC has sought to promote localism and empower the local community to influence the pattern of future growth, the resulting development strategy in Wickham seeks to disperse development across several sites in order to minimise the impacts of development, which is unsound when considering the alternatives. This dispersal strategy originated in the early community consultations in 2010 before the publication of the NPPF and its objectives, for example paragraph 52, which recognises the logic in planning for larger extensions to villages and towns in appropriate spatial contexts, and the core principle to manage patterns of growth to encourage sustainable travel (paragraph 17 bullet eleven). The NPPF supports development plans that reflect the vision and aspirations of the community (paragraph 150) but also states that "Local plans must be prepared with the objective of contributing to the achievement of sustainable development" (paragraph 151) i.e. community support alone does not equate to sustainable and sound development strategy.
- 3.6 Nothing in the site selection process or sustainability appraisal of the plan, the deficiencies of which we have already highlighted in earlier representations, justifies the submitted approach as the most sustainable option. Indeed, we fear that the intention of WCC to allow the local community to lead the site selection process has resulted in an overly light-touch assessment of the sustainability issues.
- 3.7 We also note that while the proposed development strategy has been endorsed by the parish council, the elected representatives of the local community, this is not the same as being supported through a neighbourhood plan process. The parish council's support for the submitted strategy has therefore neither been subject to the basic tests for neighbourhood plans, or endorsed by a majority vote through referendum. The basic tests include having regard to national policy (test a), and achieving sustainable development (test d).
- 3.8 The balance of weight afforded to the parish council's input into the development strategy should therefore be given appropriate weighting in the balance of considerations, and significant weight must be given to achieving the principles of sustainable development set out in the NPPF, and the underlining objective of LPP1 to promote sustainable communities.
- 3.9 On behalf of Bloor Homes, we have previously set out our reasons as to why the option of allocation land at Mill Lane alongside land at Winchester Road is the most sustainable option when considering the available alternatives. To remedy the issue, in the absence of any technical or other policy issues with the

suitability or deliverability of the land in Bloor's control, we consider that there are two options:




- 1) allocate land at Mill Lane alongside Winchester Road, either as a single allocation (which would appear to be the most logical) or as separate, adjoining allocations, and delete the allocation at The Glebe
 - 2) allocate land at Mill Lane in addition to land the submitted allocations at Winchester Road and The Glebe, on the basis that the NPPF seeks a significant boost in housing supply (paragraph 47), and its presumption in favour of sustainable development.
- 3.10 Regarding the second option, the requirement for new homes set out in LPP1 is not a ceiling on the level of growth. Core Policy 1 states that the district's target is "about 12,500 dwellings (net)". Therefore, in accordance with the NPPF's presumption in favour of sustainable development (paragraph 14), and the overarching objective to significantly boost the delivering of housing (paragraph 47), land at Mill Lane could be allocated in addition to the two submitted allocations, if all three of the short-listed sites were deemed to be sustainable options.

4. Conclusion

- 4.1 In conclusion, Bloor Homes continues to consider that the submitted development strategy for Wickham is not sound: it is not justified as the most sustainable option when considering the available alternatives, it is not consistent with national policy and guidance to actively manage patterns of growth to reduce traffic generation and promote healthy communities, and is not deliverable.
- 4.2 Allocation of the land at Mill Lane would significantly help to resolve the sustainability and deliverability/connectivity issues with the allocations at Winchester Road and the Mill Lane sports pitches, as have been exposed by the Bewley applications.
- 4.3 Land at Mill Lane is key to achieving a more sustainable pattern of growth for Wickham.

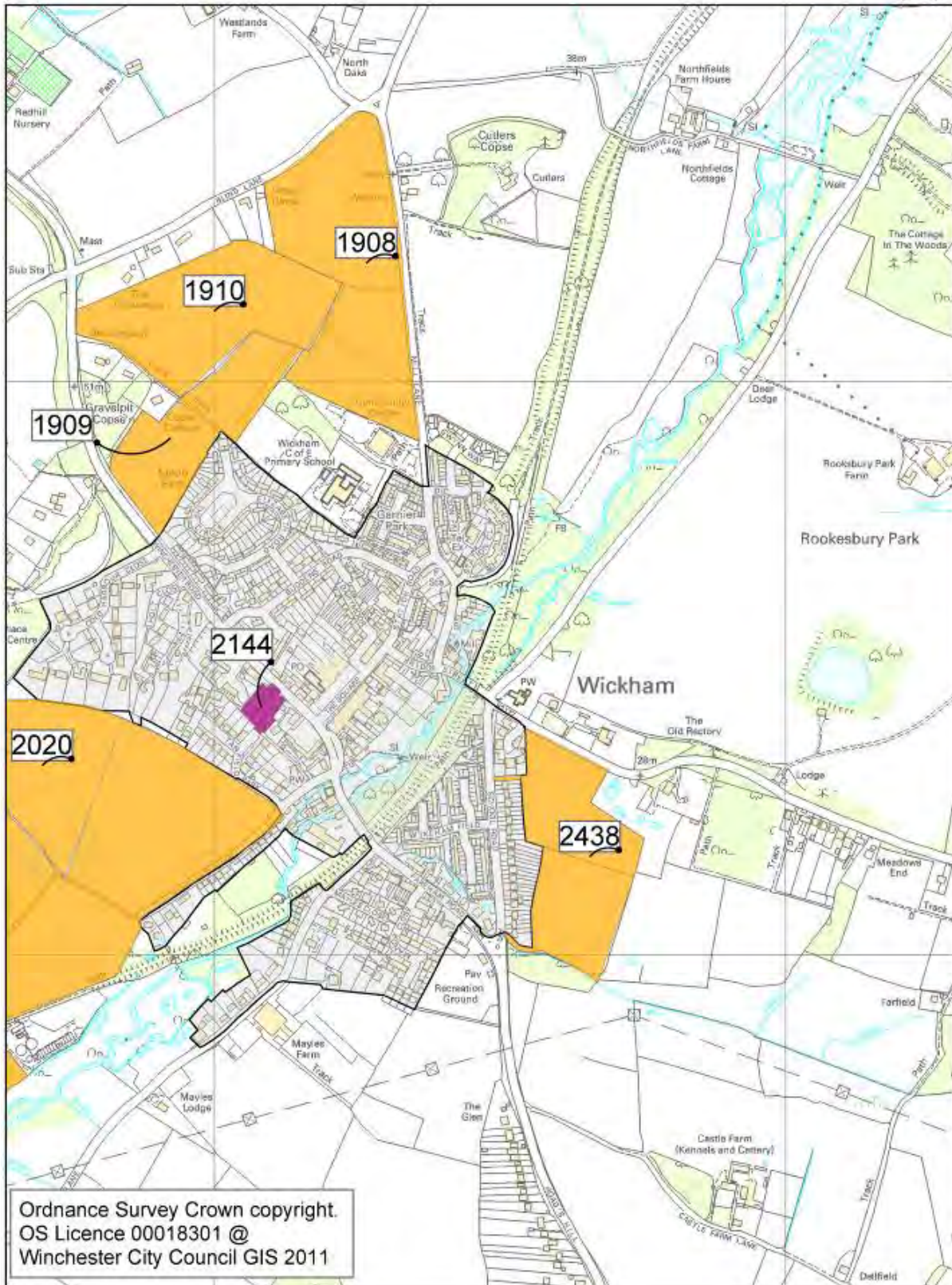
Appendix A Wickham SHLAA sites map1908

Winchester District Strategic Housing Land Availability Assessment

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

Wickham 2

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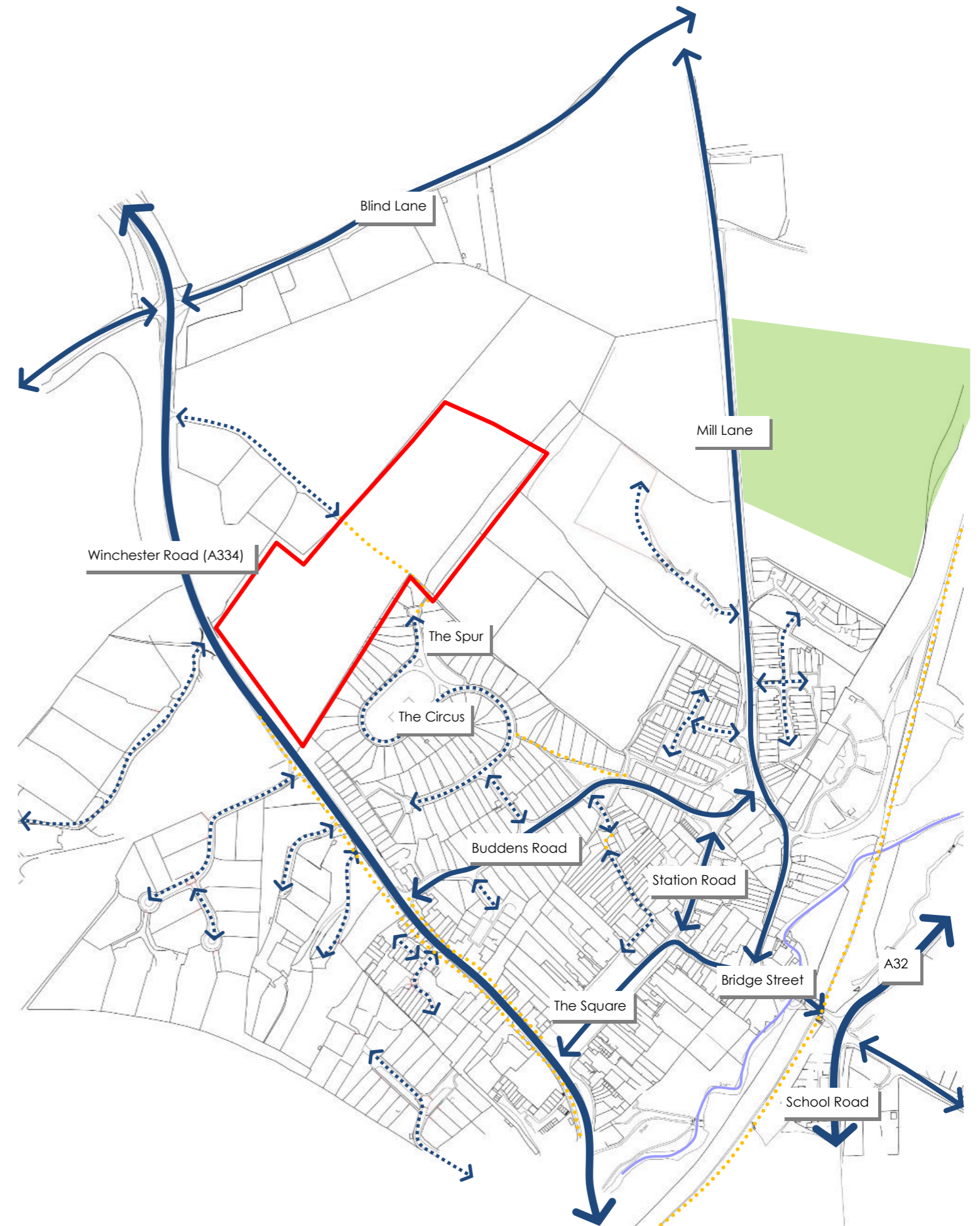
MAP 35 – WICKHAM 2

Appendix B

**Extracts from the design and access statements
submitted with the Winchester Road applications**

Analysis: Movement

1. Winchester Road (A334) is the principal road into and out of Wickham. It provides access to Fareham, Botley, Bishops Waltham and Hedge End. The A32 passes to the east of the main part of the village and it links Fareham to Alton. It provides access to the rural hinterland to the north and to Fareham Town Centre to the south. The junction between the A32 and the A334 is situated to the south east of the village.
2. A footpath is sited on the western side of Winchester Road, adjacent to the site. Mill Lane to the east and Blind Lane to the north, are relatively narrow country lanes with no footpaths, serving the adjacent rural area.
3. The unmade pedestrian route, that bisects the site, connects to the village Market Square, via The Circus, Elizabeth Road then Dairy Moor. Northwards the route leads to the junction of Blind Lane/Titchfield Lane & Winchester Road. This route provides access to routes around adjacent fields. Apart from at Winchester Road the remainder of the site boundaries are not purposely accessible to the public.
4. The remainder of the site boundaries do not offer access to the public as the fields that form the development site are gated.
5. Generally over the wider area, existing development, served from through routes such as Winchester Road, Buddens Road, Station Road and The Square, are generally in the form of culs-de-sacs.



Bridleway bisecting the site.



Typical view along Winchester Road.



The Spur.

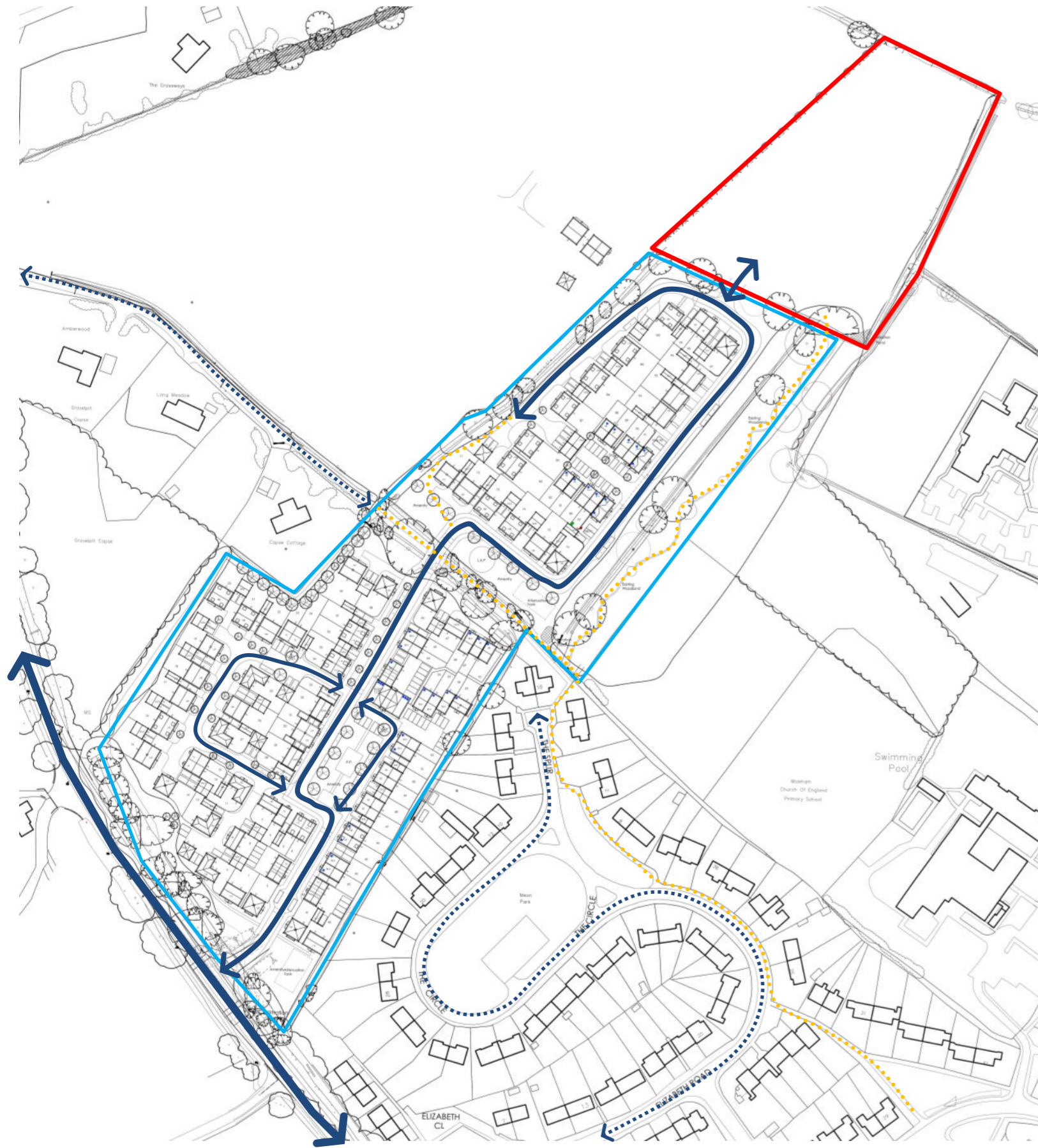


Blind Lane.

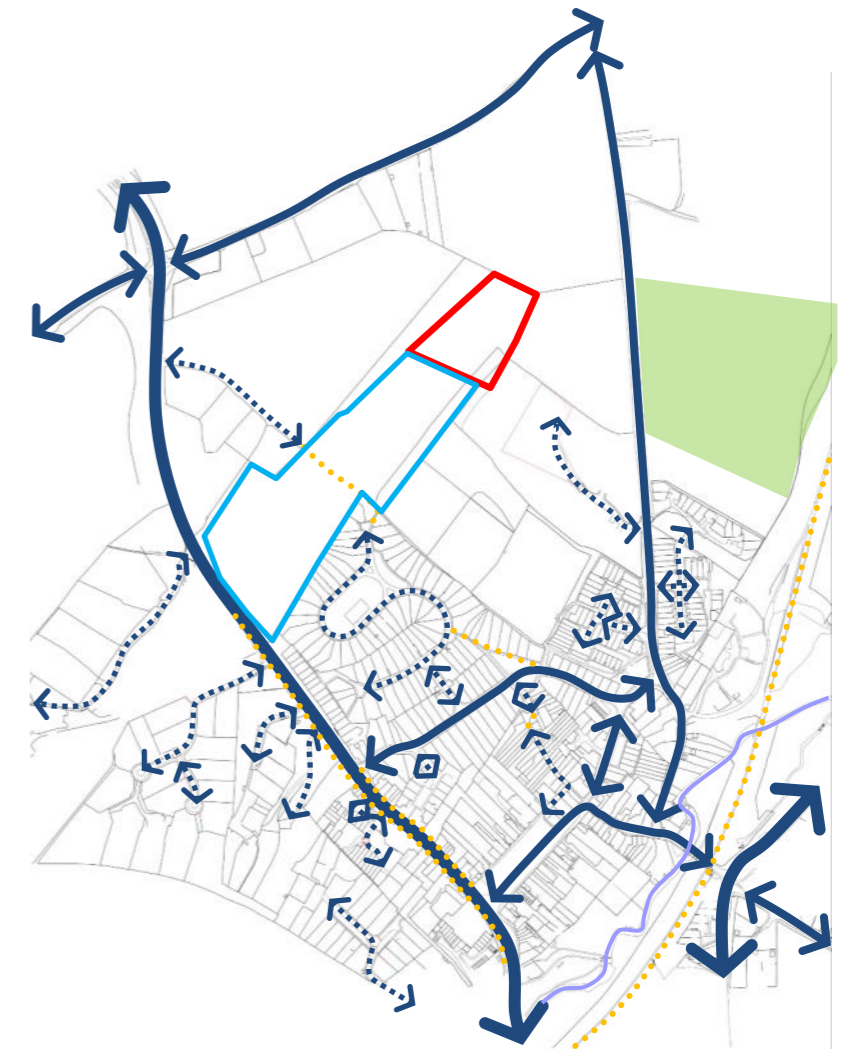


Mill Lane.

Analysis: Access & Movement



1. The application site has no determined access to the wider area apart from that offered by the parallel application for 100 units. Meaning this application site is fundamentally reliant on the associate application for access.
2. That associated application for 100 units, services all its contained units by way of a meandering spine road that abuts this applications southern boundary.
3. Alongside this pedestrian and vehicular access point, access to the woodland to the south of the site is achieved at the northern boundary of the woodland.
4. This in effect provides 1 No. vehicular, and 2 No pedestrian points of access. Of which the adjacent sites road offers 2 pedestrian routes south westwards.



Appendix C

Comments on behalf of Bloor Homes of the Winchester
Road application



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Mr Simon Avery
Winchester City Council
City Offices
Colebrook Street
Winchester
SO23 9LJ

Sent by email: planning@winchester.gov.uk

1 March 2016

Our Reference: 151070/JI

Dear Mr Avery

**Land at Winchester Road, Wickham
Applications 15/01980/FUL and 15/01981/FUL**

On behalf of Bloor Homes, who control land at Mill Lane immediately adjacent to the application sites (SHLAA site 1908; see the attached site plan), we write to comment on the proposals.

We note that Bewley Homes is applying for 100 homes within the land identified for allocation in the Pre-submission Local Plan Part 2 (LPP2), and a separate application for a further 25 homes on an extension to the allocated land which adjoins the land controlled by Bloor.

Bloor Homes has been consistently promoting the availability of land at Mill Lane through the LPP2, identifying the key role that this land can play in connecting development at Winchester Road to the community facilities in the village, and the new sports pitches identified at (east of) Mill Lane. It appears that the proposed applications cannot provide direct and attractive/convenient non-vehicle access to these important destinations. In particular with reference to the sports pitches, we assume that these will be secured by a s106 agreement and therefore must be deemed necessary to make the development acceptable in planning terms (in order to comply with the CIL tests). It is therefore nonsensical that such 'necessary' facilities are practically inaccessible by cycle and foot to the development that they are intended to serve. In this context, we note that further information has been requested by the Urban Design officer in respect of issues relating to off-site connectivity.

A more logical and sustainable planning solution would be to facilitate the delivery of land at Mill Lane (through an allocation and/or through a positive response to a planning application) to deliver direct connections to the new sports pitches and existing community facilities. This would also generate additional contributions for the delivery of the sports pitches and associated

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facilities, which we note may not be provided in their entirety unless both of the applications are approved.

We would further note that, in locational terms, the Mill Lane development, as proposed through the LPP2, would not encroach further into the countryside and would represent sustainable development for the reasons identified above. Bloor will continue to promote the availability of this land through the examination of the LPP2 and will welcome the opportunity to contribute to integrating the Winchester Road allocation with the existing settlement to deliver an optimum planning outcome.

We trust that these comments will be given due consideration.

Yours sincerely,



James Iles MRTPI
Associate Director

cc Ron Hatchett, Bloor Homes