

Winchester District Local Plan Part 2 – Development Management and Site Allocations

Examination – July 2016

Winchester City Council

Response to Inspectors Questions:

Matter 9 New Alresford
Question i) and ii)

Library Reference: WCC FS 9



Matter 9: NEW ALRESFORD – Policies NA1–NA3

Inspector's Questions:

WCC FS Matter 9 New Alresford

- 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?

Introduction and background:

1. New Alresford is a small market town to the east of Winchester. The development requirement for Alresford is set out in Policy MTRA2 (OD7) which specifies “*provision for about 500 new homes*” and indicates that “*Economic and commercial growth will be supported to maintain and improve the shopping, service, tourism and employment roles of these settlements*”. The policy also states that development needs should be met “*within existing settlement boundaries in the first instance*”.
2. The capacity for development within the existing settlement boundary was assessed: the results are at paragraph 4.5.4 of the Local Plan:

New Alresford Net Housing Requirement

Category	No. of dwellings
a. Requirement (2011-2031)*	500
b. Net Completions 1.4.2011 to 31.3.2015	42
c. Outstanding permissions at 31.3.2015	28
d. SHLAA sites within settlement boundary	30
e. Windfall allowance	0
f. Total supply (b+c+d+e)	100
Remainder to be allocated (a – f)	400

3. The process of selecting sites has taken into account the work of a number of “Needs Groups” set up to establish needs for various types of development. The results included needs for not just housing, but employment, open space, parking, burial ground, etc. Work with the Town Council resulted in a development strategy to meet LPP1 requirements and achieve sustainable development in line with the NPPF/PPG. There was consultation on the emerging strategy in early 2014 and it was amended before being included in the Draft Local Plan. Details of the community involvement are set out in the [Council's Regulation 18 Consultation Statement \(OD5\)](#): section 3 provides a summary for New Alresford up to the Draft Plan stage.
4. The [Housing Site Assessment Methodology](#) (EBT4) sets out the approach to identifying sites, with the settlement specific summary for New Alresford at section 10. Specific evidence was collated for various matters such as transport

(EBNA1/2/3), employment (EBNA 12/13) landscape sensitivity (EBNA4), open space (EBNA5/15/17), and historic environment (EBNA6), see also [Background work with Parishes on LPP2](#).

Key issues during consultation

5. Alresford attracted by far the most representations and the following paragraphs respond to the main issues raised under the relevant policy heading. Issues relating to more than one policy are included under one heading to avoid repetition. Most issues raised were also subject to comments on the Draft Plan and Appendix N of the [Report to Cabinet Local Plan Committee CAB 2721\(LP\) 6 October 2015](#) (WCC4) contains a detailed response.
6. Many representations refer to alleged inadequacies of consultation, the use of erroneous projections and further work by the Needs Groups. However, consultation has been extensive and more than meets the requirements of legislation and the Statement of Community Involvement, but has demonstrated that there is no consensus on the planning strategy for Alresford.
7. The 'Alresford Professional Group' (APG) promoted an alternative 'dispersed' development option at the Draft Plan stage and many comments refer to this 'alternative plan'. The Town Council is the elected representative body locally and supports the Local Plan's strategy, subject to various representations about its details. Contrary to some suggestions, the Council has carefully assessed the various components of the 'alternative plan' (see Appendix N to WCC4), but has concluded that the Local Plan's strategy is the most suitable taking account of all the criteria.

Policy NA1 – Car Parking Provision

8. Paragraphs 61-74 of WCC4 Appendix N respond fully to the various issues raised in relation to NA1. Consultation during the development of the Local Plan highlighted the need to retain existing public car-parking and to increase it where the opportunity arose. This is confirmed by the Winchester District Car Parking Strategy, which shows that these car parks are some of the most heavily used in the District with over 90% occupancy (with 85% occupancy considered to be operational capacity). Comments suggest wide support to retain existing car parks and to increase provision, but some suggest this should be at Arlebury Park. This has a much lower occupancy rate, suggesting that it is not convenient for the town centre, and challenging the logic of extending this car park.
9. Policy NA1 will secure the current parking provision at the Station and Perins School and seeks to significantly increase provision with a new car park of 50-100 spaces. It

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does not allocate a new public car park so deliverability issues are addressed in relation to policy NA2. Policy NA1 includes flexibility for provision elsewhere as an alternative and supports the sustainable development objectives of the NPPF, particularly in relation to the vitality of town centres.

Policy NA2 – The Dean

10. The key issues raised in representations on policy NA2 relate to:

Lack of office provision / NPPF Compliance

11. Some representations contend that NA2 does not allocate a range of suitable uses to ensure the vitality of the town centre, but redevelopment of The Dean for mixed uses is appropriate to a town centre, supporting its vitality by regenerating an under-used area. An additional 75 dwellings will reinforce the vitality of the town centre.

12. The policy facilitates the provision of offices, but is right not to require them. Viability and deliverability are frequently raised by objectors to this policy, but the Land Allocation Viability Appraisal (Appendix 4 to WCC4 Appendix N) is clear that the commercial element (site C in the appraisal) generates a negative value, hence the conclusion that *'an increase in the employment provision accentuates the loss...'*

13. NA2 does not conflict with LPP1 policy CP9 (and various 'DM' policies), as suggested by some respondents. CP9 lists factors to be considered regarding retention of business uses. CP9 bullets 1-2 relate to other employment uses, including specific local requirements, but the Viability Appraisal shows that redevelopment for 'B' Use Classes is not viable. Environmental and access constraints (CP9 bullets 3-4) are known issues, particularly HGVs, which residential development would alleviate. Demand is low for the existing accommodation at The Dean (CP9 bullet 5), as shown by the level of vacancies. More modern/high quality units would only be provided if viable. There is a local need and demand for housing, parking, etc and the benefits of the proposed uses outweigh the retention of existing uses (CP9 bullet 6).

Businesses do not wish to relocate to Sun Lane / will be displaced

14. The Local Plan does not require businesses to relocate, but aims to provide the opportunity for those that wish to, but various premises are already vacant and others are keen to relocate/redevelop. Redevelopment as proposed in the Plan will, amongst other things, overcome the existing problems caused by heavy vehicles accessing The Dean.

15. The Council sought to contact the owners/occupiers of sites at The Dean but not all responded as some are understandably cautious about discussing future intentions, for commercial reasons and concerns about the impact on their staff or landlords/tenants. Only one business that responded indicated they would not move, with the owners of most of the area either keen or willing to consider moving (see WCC4 paragraphs 78-85).
16. The map at Appendix 1 assesses the availability of the various land ownerships at The Dean. It shows that 61% of the allocated area is available by virtue of its owners being keen to promote housing, The table at Appendix 1 indicates that the majority of owners have indicated a willingness, at least in principle, to relocate/redevelop or is vacant. This leaves a relatively small area controlled by owners that have either not responded or indicated unwillingness to relocate/redevelop. This shows that the vast majority of the area is available and that it is possible to 'work around' any remaining owners who wish to remain.
17. Some sites have tenants but, as with any tenants, they are subject to their lease arrangements regarding the review/termination of the lease. Redevelopment of The Dean could result in the displacement of existing businesses, but part of the aim of NA2 is to reduce harmful impacts identified during the development of the Plan.
18. Some respondents suggest that The Dean should not be developed until land at Sun Lane is available, as required by the Draft Local Plan's policy NA2. Whilst staged redevelopment of The Dean and Sun Lane may be the ideal, it is not reasonable to hold back redevelopment at The Dean until land in separate land ownership at Sun Lane is made available.

Multiple land ownerships / viability

19. See paragraph 16 above. Whilst a comprehensive development may be the ideal situation, this is unlikely and NA2 requires individual proposals to enable future linkages to adjoining land and avoid harm to adjoining occupiers. It requires a masterplan for the whole allocated area and establishes other legitimate requirements, providing an appropriate framework for either comprehensive or piecemeal development.
20. Some suggest the viability appraisal is based on the site coming forward comprehensively, but the Viability Appraisal included a footnote to the effect that *'the various land ownerships is likely to lead to additional costs and time delays that could prejudice the delivery of the land for development'*. The assessment is not, therefore, based on comprehensive development, but notes the possible impacts of multiple ownerships.

21. In response, the Pre-Submission Plan removed the requirement for office development (0.5 hectares in the viability appraisal) and increased the estimated housing capacity. The viability appraisal assumed that older person's housing would provide a full financial contribution for affordable housing and gift land for a car park to the Council, which may or may not prove to be the case. These changes and options aimed to offset any additional costs resulting from multiple land ownership but, as noted above, the Local Plan does not require comprehensive development anyway.
22. Some respondents question the capacity of the site, but there are current proposals for 98 dwellings on approximately 60% of the allocated area at The Dean. A planning application was received in December 2015 (15/02944/FUL) for a 49 unit 'extra care' scheme on the Warwick Trailers site. There was a Pre-Application submission in August 2015 for 27 dwellings for the Huxley UK site, with a recent exhibition for 49 units.
23. The applicant for the Warwick Trailers site (McCarthy & Stone) confirms this will provide dwellings that contribute to the housing requirement: *'housing supply targets will rely heavily upon such land allocations as NA2 to be able to deliver such accommodation. The proposed scheme makes a significant inroad into such provision, at the same time meeting a need for older persons' accommodation. Extra Care accommodation (Class C2) would be counted for housing supply figure calculations'* (para 5.48, McCarthy and Stone Planning Statement). NA2 allocates the site for 'dwellings' and applications will be expected to provide these. McCarthy & Stone suggest the explanatory text of NA2 should refer specifically to an extra care scheme, but the policy does not require this and it would be overly prescriptive.
24. Therefore, the scale of housing envisaged by NA2 could be provided just on those parts of The Dean subject to current planning proposals, so 'about 75' dwellings is achievable even if remaining land owners did not bring their land forward. In practice, most landowners are interested in redevelopment and a housing-orientated development is clearly the most attractive in viability terms. The key landowners promote this and consider it viable, whereas the 'alternative plan' for less housing and retention of employment is neither viable nor deliverable.

Contamination / transport impact

25. Some allege that contamination makes The Dean unsuitable for residential development. In response, the Pre-Submission Plan includes a requirement for an assessment of contamination and a programme of remedial works. The proposals currently under consideration for the Ceejay Systems and Huxley sites include assessments of contamination and conclude that this will not prevent development or make it unviable.

26. The Systra report shows that trip generation from residential development, especially for older person's housing, is considerably lower than for commercial uses such as those existing at The Dean (EBNA3, Table 3, page 16). Some existing uses have had complaints about traffic and noise and redevelopment of the area would result in lower levels of traffic generation and address problems associated with some existing uses.

Policy NA3 – Sun Lane

27. The key issues raised in representations on policy NA3 relate to:

NPPF compliance

28. Some respondents allege that NA3 does not follow the 'sequential approach' promoted by the NPPF, but policy NA3 promotes a range of 'B' use classes (B1, B2 and/or B8), rather than just offices (B1a). The explanatory text refers to the location of various uses, excluding B1a. Significant office use is not intended, but some small scale or ancillary provision should be allowed, to serve other uses and achieve a mix of employment. NA3 provides flexibility and the 'sequential approach' would need to be taken into account in dealing with any planning application.

Alternative sites / Sustainability Appraisal

29. Appendix N to WCC4 contains a detailed analysis of the key issues relating Alresford, including the alternative plan', with consideration of each site against the selection criteria at Appendix 1. It concludes that the 'alternative plan' is not a better strategy than the Local Plan and is not deliverable. The APG and other objectors propose housing on the Sun Lane site, despite their objections to it, promoting 160 dwellings plus a care home of 40 units without significant transport improvements.

30. The 'alternative plan' relies on unviable redevelopment of The Dean for 30 dwellings and employment. It also includes 92 units on the southern part of land at New Farm Road (SHLAA site 1927), despite this site no longer being promoted through the Pre-Submission Plan. Sun Lane is the only site where shortfalls could be addressed, requiring a level of development not significantly below that promoted by the Local Plan.

31. Appendix N to WCC4 includes a section on the findings of the Sustainability Appraisal (table at paragraph 176 of WCC4) and changes were made in response to the SA's recommendations. It is acknowledged that there is an error in the SA for site 2552 which should be corrected – it is not an existing sports pitch but is allocated

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for recreation use in the 2006 Local Plan. This was known during the site selection process.

32. The SA assesses the likely sustainability impacts of various options, it is not an alternative to the site selection criteria. The APG's 'alternative SA' attempts to assess each potential site, illustrating their misunderstanding of differences between the SA and the site selection process. It is also based on the APG's evidence, which is not necessarily accepted by the Council. The 'alternative SA' is not, therefore, comparable with the SA of the Local Plan and is incorrectly used to select sites rather than to identify potential sustainability issues.

Employment need / population data

33. Appendix N to WCC4 sets out the situation regarding the error that was discovered in the population projections at the draft Local Plan stage. It appends a joint statement and a more detailed ['Alresford Population Projection Correction Report'](#) was published in early 2015, concluding that the population projected for Alresford in 2031 could be over-estimated by 472-685 people. A series of 'Addenda' were produced to the Needs Group reports assessing the implications of this.
34. The 'Employment Needs Report Addendum' (EBNA13) concluded that about 250 additional jobs should be provided, compared to at least 200 in the original Employment and the Local Economy Needs Report (EBNA12). The main difference was that the Addendum assumed that 80% of the additional workers would be 'home workers', so additional employment land/floorspace would not be needed. Therefore, despite the criticism that the population projection error was not taken into account, the additional jobs needed actually increased following the Addendum report.
35. While there is no 'strategic' need for additional employment floorspace to meet a District requirement, policy MTRA1 of LPP1 requires that employment land is retained and that new sites or buildings are developed to provide for local employment and businesses. MTRA2 expects the employment role of larger settlements to be maintained and improved. Both of the largest rural settlements (Bishops Waltham and New Alresford) identify a need to increase employment and policies CP8 and CP9 of LPP1 also promote a positive approach to economic development and retention of employment land.
36. The retention/redevelopment of land at The Dean for employment uses is not viable so this land change to other uses, regardless of the Local Plan's proposals. The 'alternative plan' is therefore unrealistic and at least 2.1 hectares of employment land needs to be re-provided to replace land lost at The Dean. It cannot be assumed that most new jobs will be 'home workers' as this will not meet all business needs, e.g.

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various activities cannot be undertaken from home and some 'home workers' need a site/building as the base for their parent company, for storage, or for office space.

37. Given the positive approach to business promoted by LPP1, the need to provide for a range of business opportunities in Alresford, and to ensure viable provision of modern floorspace for the future, additional employment land is needed in Alresford. The southern part of the Sun Lane site is the only viable and suitable location and enables traffic to access the A31 directly without needing to pass through the centre of Alresford.
38. Some respondents refer to vacant floorspace available in the area, mostly outside Alresford (reference is usually made to 'within 10 miles'). Available floorspace within Alresford itself is mainly at Prospect Road and The Dean and the scale of floorspace available outside Alresford is irrelevant as the Local Plan aims to provide for local business needs. Any business wishing to establish or expand in Alresford needs space in Alresford itself, not in Winchester, Alton, etc.

Traffic implications / new A31 junction

39. The Council commissioned Systra Consultancy to undertake a comparison between the transport impacts of the draft Local Plan proposals and the 'alternative plan' (Transport Evidence Base New Alresford Allocations – EBNA3). Systra have been re-commissioned to respond to the points raised in representations.
40. Systra's 'Response Report' (Appendix 3) concludes that *'the transport evidence base remains robust and that the Local Plan remains sound'*. The highway authority (Hampshire County Council) *'does not object in principle'* to policy NA3, setting out several matters to be addressed at the planning application stage. The County Council is participating in the examination hearings and Systra will be part of the City Council's team.

Impact on 'most sensitive' land / landscape matters

41. The Council has commissioned its former landscape architect to respond to landscape issues and her report is attached (Appendix 4). The 'most sensitive' categorisation is not a formal designation, but one factor to be taken into account in the site selection process, as in other settlements. Appendix 4 concludes that the development proposed for Sun Lane is appropriate in landscape terms. The Local Plan achieves the necessary development at The Dean and Sun Lane, whereas any alternative would require additional greenfield sites with their own landscape impacts.

Policy detail

42. Historic England requests a specific criterion relating to archaeology. The Council's approach is only to include a specific archaeological requirement where there is known interest (e.g. policy WK3), rather than where there is just 'potential'. Agreement has been reached with Historic England on this approach (see Statement of Common Ground) and a minor modification is proposed to paragraph 4.5.23 accordingly (see Appendix 2).
43. Some respondents suggest the Sun Lane development should be staged to prevent it all being developed in a short period and to test its impacts at each stage. Policy NA3 already requires development to follow a particular sequence (Nature & Phasing of Development, 3rd bullet) and it is not realistic or justifiable in planning terms to impose more detailed phasing. In practice, this is a large site which will inevitably take several years to plan and develop.

Status of allocated sites

44. The following updates the status of the sites allocated in Alresford:

Table 1

Policy Ref	Site	Status
NA2	The Dean	Full planning application for extra care scheme of 49 units, etc submitted Dec 2015, ref: 15/02944/FUL (relates to part of allocated land). Pre-app for 27 dwellings submitted 2015 (relates to another part of allocated land), exhibition June 2106 for 49 units.
NA3	Sun Lane	EIA screening opinion submitted Dec 2015, ref 16/00011/SCREEN. Masterplan consultations during Spring 2016. Site promoter intends to submit a planning application in Autumn 2016.

Response to Further Statements

45. Several Further Statements have been submitted in respect of Matter 9 which mainly reiterate comments contained in original representations, although there are two matters which warrant a response.
46. Firstly, the APG now appears to largely accept policy NA2, with the main difference being that APG's proposed wording removes reference to the a masterplan and comprehensive development (bullets 2 and 3 of NA2), specifies "*B1 and other*

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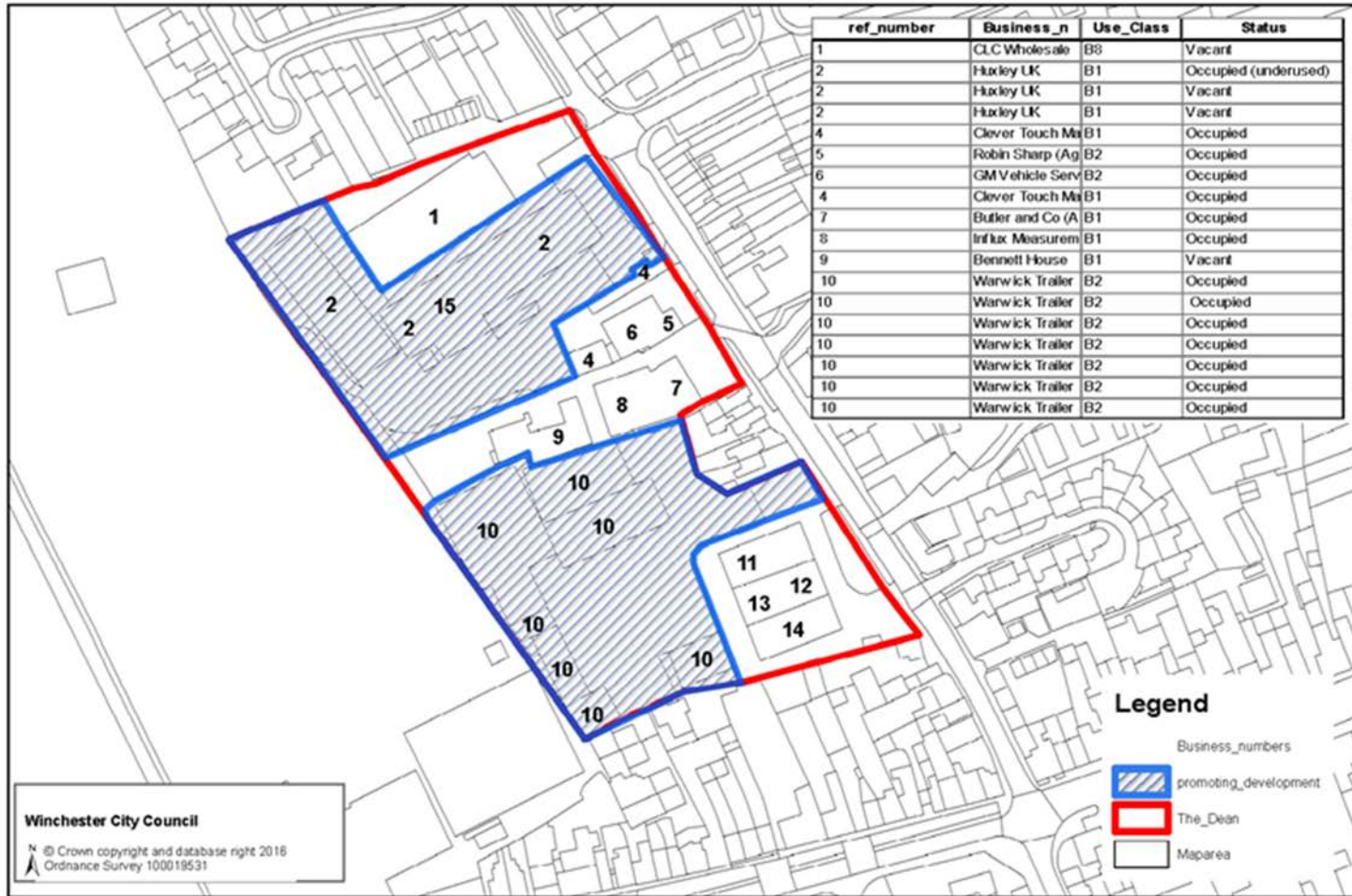
business uses compatible with the area” and deletes reference to additional car-parking provision. It promotes up to 75 dwellings, but does not make clear how commercial development will be provided. In practice, this is unlikely to be achieved because individual landowners will promote viable development, i.e. housing.

47. The APG now accepts development east of Sun Lane (for fewer dwellings) and that The Dean and Sun Lane are the preferred housing sites. Because they argue that these sites cannot achieve the required scale of housing, they promote additional sites (Arlebury Park and New Farm Road) to ‘make up the numbers’. The Council welcomes the acknowledgement that Sun Lane is preferred and is satisfied it can accommodate 325 dwellings, along with viable provision of employment, new access and open space. This is a far superior option and more than just ‘the sum of its parts’.
48. Secondly, Seaward Properties have provided significant additional material in support of their proposals for the site, reinforcing the availability and deliverability of the site. They provide a Marketing Report setting out the results of the initial marketing of the commercial element, demonstrating considerable unmet demand for commercial units in this location. Two ‘exclusivity agreements’ have been signed and the whole employment area could be developed in a 5 year period. This also demonstrates significant interest in B8 uses, which policy NA3 provides for, despite objections suggesting that the site is not suitable/needed for these uses.

Conclusion

49. This part of LPP2 has an extensive evidence base, both factual assessments and local community engagement. The policies express the necessary detail to achieve well planned and considered developments without being overly prescriptive, whilst allowing for flexibility in accordance with NPPF para 154.
50. The Council considers that this part of LPP2 complies with the requirements of the NPPF, reflecting local circumstances and providing for a balance of economic, social and environmental considerations to achieve sustainable development. The policies have been tested in terms of delivery and infrastructure requirements, resulting in a strategy and proposals for Alresford which are sound.

Appendix 1 – Map of The Dean Area



Appendix 2 – Proposed Modifications

The following Minor Modification is proposed in relation to the New Alresford section of the Plan:

1. Amend paragraph 4.5.23 as follows:

“...Substantial boundary planting will also be needed on the eastern edge of the site, which is sensitive in landscape terms, and the archaeological potential of the area will need ~~to be investigated and protected as necessary~~ an assessment to define the extent and significance of any archaeological remains and reflect these in the proposals, in accordance with policy DM25, prior to the commencement of development.”

Appendix 3 – Response to Transport Representations

LPP2 Transport Evidence Base: Representations on
Pre-Submission local Plan
Reference number 103976-12

01/07/2016

**RESPONSE TO TRANSPORT REPRESENTATIONS FOR
SUN LANE NEW ALRESFORD: FINAL**



SYSTRA

LPP2 TRANSPORT EVIDENCE BASE: REPRESENTATIONS ON PRE-SUBMISSION LOCAL PLAN

RESPONSE TO TRANSPORT REPRESENTATIONS FOR SUN LANE NEW
ALRESFORD: FINAL

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1. INTRODUCTION

1.1 Context

- 1.1.1 Following the publication of the Pre-Submission Local Plan in late 2015, representations from interested parties have been received. This report assesses and responds to transport objections received in relation to the proposed mixed use allocation (Policy NA3) at Sun Lane, New Alresford.
- 1.1.2 Three principal objectors; APG (Alresford Professional Group), Alfred Homes and Southcott Homes; have made detailed technical submissions; each promoting alternative development allocations and challenging the Councils' transport evidence base for the Local Plan. This report considers in particular the comments submitted by these objectors and assesses the implications of their comments on the soundness of the evidence base.

2. ASSESSMENT OF REPRESENTATIONS

2.1 Introduction

- 2.1.1 This report focusses on the technical submissions prepared by the transport consultants acting on behalf of the three principal objectors. Both APG and Southcott Homes are advised by the same independent transport consultant hence there are many similarities in terms of the comments received from these objectors. A summary of the main points from each objector is included in Section 2.2.
- 2.1.2 All three objectors have submitted representations at earlier stages of the Local Plan. The current representations restate the key principles of previous submissions but also now contain specific comments relating to the August 2015 Systra Transport Evidence Base report.

2.2 Summary of Representations

2.2.1 Alresford Professional Group APG

Main Points:

1. Local Plan does not address the question of what happens if the proposed A31 junction cannot be built.
2. Site Accessibility sheets for SHLAA sites are misleading and inaccurate and biased in favour of the Sun Lane site.
3. The highway authority's views on the acceptability of the A31 access should be determined as, without acceptance, the overall plan for Alresford is unsound.
4. No validated, dynamic transport model to assess strategic 'through traffic'
5. Systra model incomplete due to omission of trips to Basingstoke and Cheriton.
6. Systra trip generation rates lower than local Orchard Close survey.
7. Sustainable travel has not been adequately considered. Existing pedestrian, cycle and public transport facilities are inadequate.
8. Making Sun Lane one-way will create a circuitous route for local traffic.
9. Size and mix of employment is not clearly defined and trip rates could underestimate traffic generation.
10. Sun Lane is heavily congested with parked cars from local residents and school traffic.
11. SHLAA Site Accessibility ratings are inaccurate and biased away from APG's proposed 'distributed' housing allocation.
12. No public record of agreement from Hampshire County Council on highway matters.
13. Absence of eastbound off-slip road will force residential and employment traffic onto local roads.
14. Construction traffic will impact local roads.
15. Impacts of traffic on local roads are underestimated due to false assumption that the majority of vehicles will use the new A31 junction.

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16. Sun Lane and its junction with East Street are unsuitable for significant levels of traffic. The proposal to convert to one-way southbound will increase traffic on Nursery Road.
17. Feasibility/deliverability of A31 junction has not been demonstrated. Safety and environmental impacts have not been assessed.
18. APG considers that the employment zone is not justified and should be omitted.
19. APG considers that the A31 junction is not needed based on no employment zone and with a reduced housing allocation of c150 dwellings.
20. Traffic re-routing due to A31 junction has not been adequately assessed.
21. Insufficient topographical information to judge environmental impacts of A31 junction.
22. Without a detailed phasing plan at pre-submission stage the effects of the A31 junction and internal road layout cannot be assessed.
23. A fatal accident has occurred at The Cricketer's junction on Tichborne Down since the evidence base accident assessment was carried out.
24. No information on environmental impacts, including noise, trees, wildlife and listed buildings.

2.2.2 Alfred Homes

Main Points:

1. Notes that since the Local Plan evidence base was prepared, it is understood that the development strategy for New Alresford now seeks the delivery of 400 dwellings as opposed to 385 dwellings.
2. Pedestrian route to town centre via Sun Lane includes sections with no footways or lighting. The route via Nursery Road is 300m longer.
3. Accessibility assessment should take account of distances to secondary schools, employment, health and leisure facilities as well as public transport, local centres and primary schools.
4. The Arlbury Park site is better located to encourage walking trips to local services and is closer to existing bus services. Sun Lane site is 800m from a bus stop.
5. The proposal for a full Grade Separated junction does not comply with DMRB standards and may require land outside the control of the Sun Lane site promoter.
6. A hypothetical, alternative design based on Compact Grade Separation, would also not comply with DMRB standards, or would require land outside the control of the site promoter.

2.2.3 Southcott Homes

Main Points:

1. Errors in the Council's distance measurements in the Site Accessibility assessments could have affected decision making.
2. Inadequate assessment of the viability or deliverability of sustainable transport.
3. Pedestrian access via Sun Lane (north) is poor due to lack of footways and on-street parking.
4. Viability and deliverability of A31 junction not demonstrated.
5. No evidence that the A31 junction design has been discussed or agreed with the Highway Authority.

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6. Current design contains features which do not comply with DMRB standards.
7. Insufficient evidence that the A31 junction is deliverable or that the costs have been fully appraised.
8. Baseline traffic data contains errors and inconsistencies; daily traffic flows are estimated.
9. Trip generation rates and trip distribution assumptions are flawed.
10. Development of Site 277 would increase traffic flows on Sun Lane and Nursery Road

2.3 Response to Representations

- 2.3.1 There are a number of common themes raised in the representations and for the purposes of this Response Report they have been collated into the following headings:

- Baseline traffic data
- A31 Junction design and deliverability
- Traffic generation, distribution and impacts
- SHLAA Site Accessibility Assessments
- Pedestrian and cycle routes and bus access

2.4 Baseline Traffic Data

- 2.4.1 Previous and current objections from APG and Southcott Homes allege that some traffic counts used in the evidence base were carried out in months not normally considered 'neutral' and one survey (at Tichborne Down) took place on a school inset day. Notwithstanding the inset day, all remaining surveys were carried out during term time and are considered to provide a reasonable indication of typical weekday, term time, traffic conditions. It is likely that flows counted on an inset day will have been slightly lower than normal. This was known at the time of the August 2015 study and taken into consideration.
- 2.4.2 None of the objectors have provided any alternative traffic counts or 2031 baseline forecasts. Neither APG nor Southcott Homes use any baseline or forecast traffic data to inform their representations in support of their alternative land allocation strategy.
- 2.4.3 In the absence of any new or contradictory traffic surveys, the baseline traffic data and conclusions reached in the August 2015 Transport Evidence Base report are considered to remain robust.
- 2.4.4 APG notes that an accident has occurred at The Cricketers junction Tichbourne Down / Jacklyns Lane) since the evidence base was prepared. The occurrence of this accident is noted but again does not affect the conclusions reached.

2.5 A31 Junction Design and Deliverability

- 2.5.1 Previous objections concerning departures from design standards, costs, deliverability and uncertainty regarding the views of Hampshire County Council, as Highway Authority, are restated in the current representations from APG, Alfred Homes and Southcott Homes. There are no new technical issues raised in the current objections.
- 2.5.2 Hampshire County Councils' Response (dated December 2015) to the Pre-Submission Local Plan confirms no objection in principle to a new junction on the A31 to serve the site. It also confirms the County Councils' view that Policy NA3 (Sun Lane Mixed Use Allocation) is both sound and legally compliant.

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- 2.5.3 The design of the junction is being progressed with discussions taking place between the site promoters and the Highway Authority, Hampshire County Council. A number of design options and variants are being considered. This work forms part of the site promoters' preparations for a forthcoming planning application and includes further development of the designs and the associated audit and approval processes. Details will be incorporated within the planning application documents to be published in due course. Pending the conclusion of the ongoing design development work, the County Council's cannot confirm approval of a particular design solution. However its' position is unchanged in that there is no objection to the creation of the junction and that Policy NA3 is sound. A representative from the County Council will be available at the Examination.
- 2.5.4 As noted in the August 2015 Transport Evidence Base report, the DMRB (Design Manual for Road and Bridges) allows for relaxations and departures from design standards, subject to agreement with the highway authority. Such relaxations and departures commonly form part of the design approval process. Discussions concerning departures are continuing between the site promoters and Hampshire County Council to ensure that the matter is fully assessed and properly discharged.
- 2.5.5 Matters relating to construction costs and deliverability were considered in the August 2015 Transport Evidence Base report.
- 2.5.6 Having regard to the foregoing issues, it remains the view of Systra, as advisors to the City Council , that the A31 junction is feasible and deliverable.
- 2.5.7 Any necessary mitigation of environmental impacts, relating to noise, visual impacts, trees, wildlife and listed buildings will be assessed at the pre-planning and planning application stages. Information on constraints has been used in developing the Local Plan and indicates that these matters do not amount to overriding objections to the proposed junction. Techniques for the mitigation of environmental impacts of road construction are well understood and there is no evidence that the construction of the A31 junction will result in insurmountable impacts.
- 2.5.8 Similarly, there is no evidence that the junction cannot be constructed and therefore criticism that the Local Plan does not address the question of 'what if' the proposed A31 junction cannot be delivered, is not relevant. Policy NA3 requires the junction to be provided in the first phase of development and the City Council is satisfied that this has been demonstrated to be deliverable.

2.6 Traffic Generation, Distribution and Impacts

- 2.6.1 The traffic generation rates and distribution assumptions used in the evidence base are clearly described in the August 2015 Transport Evidence Base report. These have been applied across all sites to provide a consistent basis for comparison of land use allocation scenarios. Also, assumptions concerning the scale and mix of employment development at Sun Lane are clearly set out. The overall housing target for Alresford has not changed and remains 500 dwellings. The estimate of the balance to be provided on allocated sites has been revised from 385 to 400 dwellings. This small net increase does not materially affect the transport analysis or the conclusions of the previous study.
- 2.6.2 Objectors have put forward various alternative trip rates for individual residential sites. None of the alternative rates provided are significantly different from those used in the evidence base. Those from APG are slightly higher and those from Southcott Homes slightly lower. The use of these different rates would not affect the conclusions of the evidence base.
- 2.6.3 APG has criticised the trip distribution on the grounds that it omits trips to/from the north (Basingstoke direction) and to/from the south (Cheriton direction). This is not correct as the assignment used in the evidence base allocates 5% of site generated traffic to each of these routes.
- 2.6.4 APG also restates previous representations that the employment allocation is not needed and therefore the A31 junction is not needed. The need for and benefits of the junction are addressed in the August 2015 Transport Evidence Base report, which demonstrates that the presence of a direct

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access to the A31 reduces traffic impacts across the town compared with the objectors' 'distributed' land allocation scenario.

- 2.6.5 Southcott Homes has presented alternative distribution figures based on workplace statistics from the 2011 census although it is not clear how these have been calculated or how the route assignment has been determined. Notwithstanding that the results are numerically different, the pattern of movement, with predominant east-west movements (with a strong bias to the west) and with only a small attraction towards the north and south, is consistent with the figures used for the evidence base. This indicates that the alternative distribution presented by Southcott Homes would not materially affect the conclusions presented in the evidence base.
- 2.6.6 Concern has been expressed by APG and Southcott Homes that the full impacts of the A31 junction, in terms of the re-routing of local and strategic traffic, has not been fully assessed due to the absence of a dynamic traffic model. Given the scale of the town, the simple nature of the highway network and because the primary function of the junction is an access into a development site, rather than a strategic change to the highway network, it is not accepted that dynamic modelling is necessary in this case. The effects of traffic redistribution are considered, in outline, in the August 2015 Transport Evidence Base report and the comments therein still apply. The Highway Authority has advised in previous consultations that the effects of traffic redistribution will need to be assessed as the scheme is progressed; this will be a requirement of a future Transport Assessment. It is considered unlikely that dynamic traffic modelling will be needed, however, the methodology for quantifying re-routing effects will be a matter for agreement between the Highway Authority and the site promoter.
- 2.6.7 Objectors have restated previous submissions that Sun Lane is congested with parked cars from local residents and school drop-off / collection; that development of the Sun Lane site (and absence of a slip road from the A31 for inbound traffic from the east) will increase traffic flows on Sun Lane and Nursery Road; and that conversion of Sun Lane (north) to one-way traffic operation will necessitate the re-routing of local traffic. These points are addressed in the August 2015 Transport Evidence Base report. Further assessment and more detailed design proposals will and should come forward as the proposals progress through subsequent pre-planning and planning applications stages.
- 2.6.8 This process is underway; emerging proposals presented at the Sun Hill site promoters' public consultation exercise in May 2016 illustrate proposals for Sun Lane in the vicinity of the Sun Hill School to improve current parking and school drop-off / collection arrangements. Proposals for improvements to Sun Lane (north) and Nursery Road are also being developed. When developed further, these measures will address local traffic impacts, however, these matters go beyond the level of detail required for inclusion in the Local Plan.
- 2.6.9 APG has expressed concerns regarding the absence of a phasing plan and risk of construction traffic using rural roads. Local Plan Policy NA3 makes clear that a phasing plan is required prior to planning permission being granted. Similar planning conditions/obligations will safeguard the preparation of a construction vehicle management plan.
- 2.6.10 The objections to the Pre-Submission Local Plan concerning traffic generation, distribution and impacts relating to the Sun Lane allocation, do not raise any material new matters.

2.7 SHLAA Site Accessibility Assessments

- 2.7.1 APG and Southcott Homes allege inaccuracies in distance measurements; the principal concern being the difference between 2013 and 2015 assessments for the Sun Lane site.
- 2.7.2 The revised 2015 accessibility scoring was on the basis of a revised understanding of the potentially developable site area. In the case of the Sun Lane site it had been concluded that only the northern part of the site would be appropriate for housing development (Draft Local Plan Policy NA3) and hence revised distances for accessibility were used in the assessments and in the case of the Sun

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Lane site proposed for housing the overall accessibility therefore improved from 'Adequate' to 'Good'.

- 2.7.3 It is important to note that this reassessment was carried out for all sites across the whole District where it became apparent that there was a clear difference between the site put forward originally and the actual site area either now allocated by the Local Plan or promoted as having potential for development. This was not a case of presenting an 'improved' assessment of the Sun Lane site, rather of clarifying which part of the site should be assessed.
- 2.7.4 The APG representations also propose different measurements to local facilities. This includes a reassessment of accessibility to a Local Centre for its proposed sites in New Farm Road (North 2553 & South 1927) on the basis of a small individual convenience store located in Mitford Road, whereas all the other assessments for Alresford were carried out on the basis of access to the town centre. This approach artificially distorts the accessibility rating for these sites from Adequate to Good and is not accepted. Elsewhere the alleged differences in measurements are small and do not affect the accessibility ratings.
- 2.7.5 Alfred Homes considers that accessibility assessments including distances to secondary education, employment, health and leisure facilities would have provided a more thorough appraisal. The SHLAA Accessibility Assessments focus on proximity to bus stops, primary education, local centres, shops and facilities. This methodology has been applied to all sites across the district to provide a consistent basis for comparison. The inclusion of the suggested additional land uses would slightly favour Arlebury Park in some instances and Sun Lane in others. Both sites are readily accessible to a full range of facilities and neither would be ruled out if the alternative methodology were adopted.

2.8 Pedestrian and Cycle Routes and Bus Access

- 2.8.1 Objectors have indicated that the northern section of Sun Lane has no footways and limited street lighting, alleging this makes it unsuitable for pedestrians. The physical characteristics of Sun Lane (north) are understood and it is likely the road will continue to operate as a shared surface. Further investigation into the scope for improvements will be undertaken at the planning application stage. However, the evidence base report quantifies future traffic forecasts and confirms that the route is not heavily trafficked and will be able to satisfactorily accommodate the predicted traffic levels. An alternative route to the town centre for pedestrians and cyclists is available via Nursery Road and Jacklyns Lane. This route is 300m longer but contains footways and lighting.
- 2.8.2 Objectors have repeated their previous representations noting that the distance between the Sun Lane site and existing bus stops is greater than the alternative sites at Arlebury Park and New Farm Road. This factor is taken into account in the accessibility analyses and represents one of several metrics used in the assessment. For example, both Arlebury Park and New Farm Road score less favourably than Sun Lane in terms of distance to primary schools. Overall, all three sites achieve 'Good' or 'Average' accessibility ratings.
- 2.8.3 Concern has been expressed that steep gradients and an absence of dedicated cycle facilities could act as a disincentive to cycling at Sun Lane. Given the topography of the town it is not accepted that the Sun Lane site is materially disadvantaged relative to other sites (or indeed existing residential areas). It is also noted that APG is proposing to allocate 150 houses at Sun Lane.

3. SUMMARY AND CONCLUSIONS

- 3.1.1 This response to the Pre-Submission Representations relates to objections from the Alresford Professional Group, Alfred Home and Southcott Homes. The three objectors have submitted representations at earlier stages of the Local Plan. The current representations restate the key principles of those previous submissions but also contain specific comments relating to the August 2015 Transport Evidence Base report.
- 3.1.2 Previous objections are addressed in detail in the August 2015 Transport Evidence Base report. New objections and comments are covered in this Response Report. Alternative analyses and calculations have been put forward by objectors in relation to traffic forecasts, accessibility assessments and traffic impacts. Where there are differences of interpretation on factual matters, including distance measurements and traffic forecasting, none of these are of sufficient magnitude to affect the original conclusions of the transport evidence base. With regard to the A31 junction there are no new technical issues raised in the current objections. Elsewhere there are differences of opinion on points of principle. However, there are no new or substantive facts, or evidence of any material errors or omissions, which undermine the transport evidence base.
- 3.1.3 It is the conclusion of this Response Report that the transport evidence base remains robust and that the Local Plan remains sound.

SYSTRA provides advice on transport, to central, regional and local government, agencies, developers, operators and financiers.

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Appendix 4 – Response to Landscape Representations

1.0 Introduction

- 1.1 This summary landscape statement has been prepared by Linda Thomas, chartered landscape architect and garden historian (masters degree in garden history and designed landscapes, Bristol University 2006), on behalf of Winchester City Council in response to landscape issues raised in representation documents for the ‘omission sites’ in New Alresford.
- 1.2 Submissions referred to in this statement raising landscape issues are from the Alresford Professional Group (APG) promoting ‘dispersed development as an alternative plan’ to that proposed in the draft LPP2 and Savills on behalf of Alfred Homes (site 2552).
- 1.3 The sites referred to and their locations are as follows:
- Site 277: land to the east of Sun Lane (Local Plan policy NA3)
 - Sites 278: 2552 and 2532: areas within and adjacent to Arlebury Park
 - Sites 1927 and 2553: areas adjacent Spring Gardens and New Farm Road
- 1.4 The shortlisting of sites was based on the evidence base for New Alresford, including assessments on transport, accessibility, landscape sensitivity and historic environment. The Councils Landscape Sensitivity Appraisal (LSA) is a key document in the evidence base and has been referred to in representation documents. For this reason, a brief description of the document and its background is set out below to assist understanding for the purposes of this examination.

2.0 Landscape Sensitivity Appraisal (WCC November 2013)

- 2.1 The document was prepared by the Councils landscape architect to assess landscape sensitivity for each of the eight market towns in the Winchester district, including New Alresford. The purpose of the document is to provide a baseline appraisal identifying existing local landscape and townscape character and sensitivities for each of the market towns and their setting. It deals with ‘inherent’ sensitivity, in other words, it is an appraisal of existing conditions without reference to a specific type of development. It should not

therefore be mistaken for a more detailed assessment that informs susceptibility to change eg proposed housing, usually carried out as a Landscape and Visual Impact Assessment (LVIA) in accordance with recognised national guidance¹. Similarly, it should not be seen as a comparative appraisal of impacts of proposed development on individual SHLAA sites.

- 2.2 The understanding of the term 'sensitivity' in the decision making process also requires clarification as it can cause confusion if the context is not properly understood. In LVIA, sensitivity is similar to the concept of landscape sensitivity used in the wider area of landscape planning (eg WCC landscape sensitivity appraisal as prepared for LPP2 evidence base) but it is not the same, as LVIA sensitivity is specific to the development being proposed as well as the location (ref GLVIA 5.39).
- 2.3 The landscape sensitivity appraisal (LSA) has been prepared as a desk top exercise with reference to recognised methodology (Hampshire County Council: *Assessing Landscape Sensitivity at a Strategic Level* 2009); national, regional and local documents on landscape character and, in addition, site assessment based on professional judgement. The document states that it '*does not try to place a value on different landscapes, nor does it seek to establish the capacity of a landscape to accommodate development*', acknowledging that a more detailed landscape assessment may be required at a later stage ie when the type and extent of development is known. An LVIA would provide this level of detail as part of a planning application. It would not have been feasible or necessary for the Council to provide an LVIA for each of the SHLAA sites as part of the evidence base.
- 2.4 Local character areas have been categorised in terms of their sensitivity, applying four levels from 'least' to 'most' sensitive. As this is an appraisal of inherent sensitivity, any individual SHLAA sites located within these character areas will have the same category of sensitivity as their local character area, and should be interpreted as such when making any comparisons of site sensitivity.

¹ Guidelines for Landscape and Visual Impact Assessment third edition (GLVIA)

3.0 Alresford Professional Group (APG) alternative plan

- 3.1 The APG 5 Note in relation to landscape issues states that *'the Council has failed to properly take into account issues of landscape when selecting sites in Winchester City's LPP2'* (p85) referring specifically to the initial sustainability appraisal (ISA) and the landscape sensitivity appraisal (LSA). This response focuses on issues raised regarding the LSA, including categories of sensitivity.
- 3.2 In support of the above statement, the APG submission makes a comparison of key landscape issues and sensitivities for each of the SHLAA sites 277; 2532; 1927 and 2553 taking into account the findings of the ISA and LSA. I would refer to earlier comments (para 2.5) regarding comparison of sites. The APG report is in general agreement with the findings of the LSA in terms of categories of sensitivity. It includes a photographic record (appendix 3) of the SHLAA sites from various public viewpoints around the village. It is noted that photographs have been taken during the summer months when vegetation is in full leaf and likely to obscure part of the view. Recognised guidance (GLVIA) advises the use of seasonal photographs to include winter views as they provide a more useful 'worse case scenario' approach. The photographic record provides a visual reference to support comments in the text but as it is not part of a formal assessment (as with an LVIA), it has not been possible to comment on the views and visual effects of proposed development on landscape character and sensitivity in any detail.

Site 277

- 3.3 The report refers to the findings of the LSA, which identifies higher visually prominent ground along the crest of a main E-W ridgeline through the centre of the site and a secondary N-S ridgeline along the NE boundary as most sensitive and the lower less prominent north and south facing slopes as moderately and least sensitive. The LSA summary of sensitivity for this area states that *'this is a substantial area in agricultural use forming part of New Alresfords distinctive landscape setting'*. Assessments show there are only limited views of the site from public viewpoints due to the site being well contained on all sides by mature field boundary vegetation, and further reinforced by the physical barrier of the A31 embankment along the southern edge and the distinctive ridgelines, typically characteristic of the undulating chalkland landscape setting east of the settlement.

- 3.4 There are two important views identified in the LSA visual constraints map and the *New Alresford Town Design Statement* (TDS); the first provides a north east to south east panoramic view from Sun Lane across the site to countryside beyond (shown in the report as viewpoint 12); the second is a panoramic view from the PRoW midway between Whitehill Lane and the B3407 looking west and south west across the site towards the settlement of New Alresford, which has not been identified in the APG report. Both viewpoints are located on the crest of the main E-W ridgeline (ie above the 105.0m contour) within the area assessed as most sensitive in the LSA where development in this location is likely to have '*significant visual and landscape impacts on the site and surrounds*' (3.1).
- 3.5 APG comments on viewpoint 12 suggest that proposed industrial units on the lower south facing slopes would be visually dominant from this location. In my opinion, any adverse impacts could be easily resolved with the introduction of robust boundary planting to infill the gap in the existing hedgerow that has opened up this view from Sun Lane; an action that would not only mitigate visual effects but also strengthen and enhance local landscape character. No other visual or landscape effects have been identified from this viewpoint.
- 3.6 The respondent considers there is a further important view of the site from a ridgeline looking north from the PROW south of A31 (viewpoint 8), although this view has not been referred to in the LSA and has not been identified as an important view in the TDS. The crest of the main ridgeline and filtered views of the upper south facing slopes within the site can be seen in viewpoint 8, whilst the remainder of the site in the southern half would appear to be obscured by tree cover in the middle distance, and the northern half obscured by the main ridgeline and boundary vegetation. The secondary ridgeline along the north eastern edge of the site is not a prominent feature in this view, its location identified only by boundary trees in the far distance.
- 3.7 Consequently, from viewpoint 8, there would appear to be minimal landscape and visual effects from development located on the north facing slopes or on the lower south west facing slopes, where it avoids the crest of the main ridgeline. The strengthening of existing boundary vegetation would further reduce any visual effects from development when seen from public viewpoints to the south, overcoming the concern that '*large buildings up to 5.0m high would impact on the ridgeline from the south*' (para 16). Furthermore, there appears to be a discrepancy regarding effects as the

5.00m building height referred to is not consistent with appendix plan 4, which states that *'building ridgelines would be at approximately 105.0m'* although development is shown on and below the 95.0m contour and would not be visible above 100.0m.

- 3.8 The report concludes that *'houses cannot be located in site 277 without impacting on land designated as most sensitive to landscape effects'*; also *'the Council has failed to make clear their criteria for selection of site 277 on the grounds of effects on landscape'*. As identified above, higher ground on the ridgelines is the most visually prominent part of the site when seen from important views and assessed as most sensitive. The crest of the main E-W ridgeline above the 105.0m contour and the highest part of the site is recognised by the Council as having the most significant effects and would thus be retained as undeveloped land. Other less prominent parts of the site on the lower slopes include areas assessed as moderately and least sensitive in the LSA; these areas are likely to be considered less harmful to landscape character and visual amenity, a preferred site for development as there would be least effects. The Council accepts that some development may need to extend into adjoining areas assessed as most sensitive but avoiding the crest of both ridgelines (ie above 105.0m) which would remain undeveloped land. In response to justification of landscape effects when selecting site 277, the Council's LSA is an appraisal of 'inherent sensitivity' and is not meant to be an assessment of landscape and visual effects, as this would require an LVIA as part of a planning application. It would not have been feasible or necessary for the Council to provide an LVIA for each of the SHLAA sites as part of the evidence base.

Sites 2532 and 2552

- 3.9 For clarification, the LSA refers only to SHLAA site 2532 in its sensitivity appraisal for Arlebury Park, when it should have stated that sites 278 and 2552 are also included within the same local character area. The report confirms there is no disagreement between the Council and APG regarding the appraisal of site 278.
- 3.10 The report accepts there would be impacts from development on Arlebury Park, which is on the Local Hampshire Register of Historic Parks and Gardens (HP&G). It states however that the impact of site 2532 on Arlebury Park is limited *'as the site is remote from it, being separated by a caravan*

park and gardens'. I do not agree with this statement. Sites 2532 and 2552 are both located within the HP&G boundary identifying the extent of Arlebury Park as shown on the Councils GIS constraints map (ref map attached).

- 3.11 To assist understanding for the purposes of this examination, HP&G boundaries were agreed in 2009 as part of a district wide exercise based on an evaluation of historic data and carried out over a period of two years involving Winchester City Councils landscape architect, the County Councils historic landscape architect and Hampshire Gardens Trust. The inclusion of both sites within the boundary of the HP&G has influenced the assessment of this part of the local character area as moderately sensitive.
- 3.12 The TDS identifies a significant length of the Avenue that includes site 2532, the access of Arlebury Park House and site 2552 as an 'important view' when looking north across the valley. This has not been identified in the APG report, which states that '*any development would be obscured by the flint wall bounding the Avenue*' (ref para 23), although it is noted that viewpoints 9 and 10 show filtered views through tree canopies that extend across the valley to countryside beyond. A site visit confirmed uninterrupted views across site 2552 to countryside beyond when standing next to the flint boundary wall.
- 3.13 For reasons stated above, I do not agree with the conclusion that development on site 2552 is possible without detriment to views from the Avenue.

Sites 1927 and 2553

- 3.14 Items 25 – 31 focus on the local character area identified in the LSA that sits between Spring Gardens and New Farm Road and includes SHLAA sites 1927 and 2553. The alternative plan proposes development in an area identified as highly sensitive and located on higher ground adjacent to back gardens of existing houses in New Farm Road. I do not agree that '*further sympathetic development adjacent to these properties would be possible without significant detriment to the landscape qualities*' (item 26) or that '*it would be less damaging to develop the land only designated as highly sensitive rather than that designated most (sic) sensitive*' (item 28).
- 3.15 As identified in the LSA, any development on sites 1927 or 2553 would have significant adverse impacts on existing landscape qualities, regardless as to exact siting or point of access, as it would affect both the highly sensitive part

of the site as well as the western and southern boundaries, assessed as most sensitive due to the special heritage and biodiversity qualities associated with the water course and the former watercress beds and St Swithuns Way, a designated national trail that passes alongside the site. In addition, the LSA identifies important views from St Swithuns Way in terms of their high amenity value but does not state that they are panoramic views as implied in items 30 and 31. To clarify the point regarding private and public viewpoints, the LSA visibility constraints map clearly shows viewpoints identified from within the public realm.

- 3.16 For reasons stated above, I do not agree with the conclusion that *'development is possible in sites 1927 and 2553 without impacting on parts of the site as most sensitive to development impacts'*.

4.0 Area within and around Arlebury Park (SHLAA site 2552)

- 4.1 Savills representation on behalf of Alfred Homes includes a landscape and visual statement from Allen Pyke Associates (Appendix 1) and a supporting historic statement (Appendix A) which focuses on the landscape and heritage constraints of the sites association with Arlebury House and its wider parkland setting.
- 4.2 The report notes that the site was given an amber flag in the initial site sieve *'due to its relationship with an undesignated heritage asset – namely Arlebury Park House'* and that the land to the east of Sun Lane (site 277) was similarly assessed with an amber flag for historic environment (paras 2.2 and 2.3).
- 4.3 It states that *'the site is not subject to any national or local landscape designations.'* This is incorrect as the site forms part of Arlebury Park, which is on the local Hampshire Register of Historic Parks and Gardens (HP&G) and listed as Site ID 1554. Site 2552 is located within the HP&G boundary as shown on the Councils GIS constraints map (ref map attached), which identifies the extent of the historic site and setting of Arlebury Park for the purposes of planning policy, in particular saved policy HE3 (Winchester Local Plan 2006), which states that *'proposals which would adversely affect the character or appearance of a park, garden or battlefield of special historic interest or its setting will not be permitted'*. The policy applies to both national and local designations. Due regard should also be given to LPP1 policy CP20

Heritage and Landscape Character; LPP2 policy DM14 Local Distinctiveness and policy DM24 Historic Parks and Gardens.

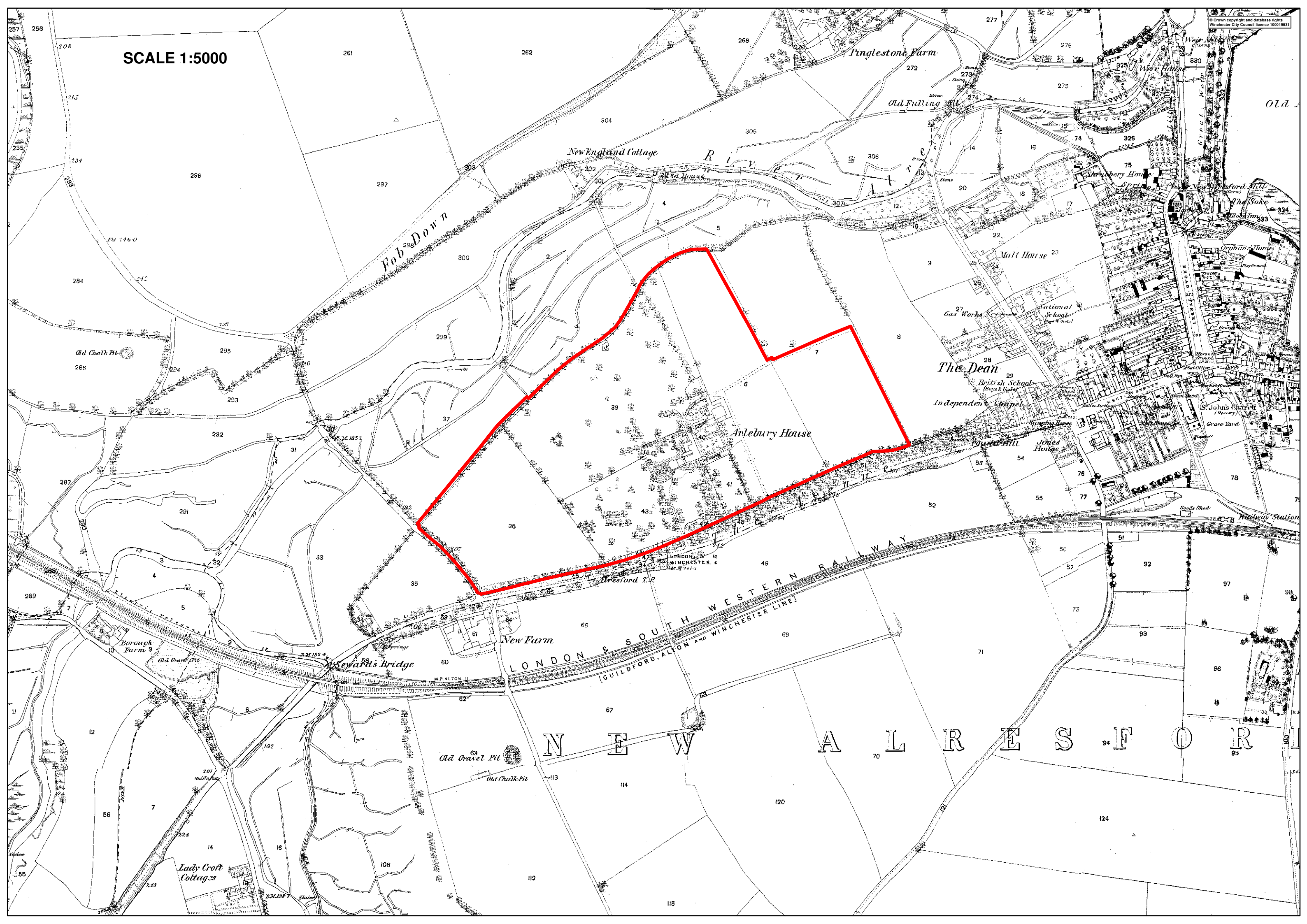
- 4.4 As mentioned above, boundaries were agreed in 2009 as part of a district wide exercise based on an evaluation of historic data and carried out over a period of two years involving Winchester City Councils landscape architect, the County Councils historic landscape architect and Hampshire Gardens Trust. The inclusion of sites 2532 and 2552 within the boundary of the HP&G influenced the LSA category of sensitivity, which assessed both sites as moderately sensitive.
- 4.5 The visual assessment (paras 2.17-2.24) refers to important views identified in the LSA although, for clarification, they are identified on the visual constraints plan as 'public viewpoints'. A map extract of important views from the *New Alresford Town Design Statement* includes a significant length of sequential views from the Avenue looking north across Arlebury Park grounds and the river valley to countryside beyond. Although this important view extends to the boundary of the recreation ground and includes site 2552, this is not clearly shown on the map extract in the assessment and is disputed in the text, which states that '*the site itself does not feature in any views across the valley*', a statement that appears at odds with the town design statement. A recent site visit confirmed filtered views from the Avenue across the valley with site 2552 in the foreground.
- 4.6 As referred to earlier, both the landscape and heritage assessments overlook the fact that Arlebury Park is listed on the Hampshire Register of Historic Parks and Gardens and has a defined boundary identifying the extent of the historic parkland for the purposes of planning policy, which includes sites 2552 and 2532. The heritage assessment clearly demonstrates that site 2552 was originally part of the historic parkland associated with Arlebury Park House, stating for instance, that '*on the tithe map of New Alresford of 1843, the site is identifiable as part of plot 66*' (ref paras 13 and 14). The gardens and parkland surrounding the house are now considerably reduced in size and somewhat eroded in character. Nonetheless, any proposed changes should take into account the area identified within the defined HP&G boundary and relevant planning policy, although this has not been carried out in the respondents assessments.

- 4.7 Consequently, the assessment of landscape effects as 'neutral' and the statement that '*the site is highly unlikely to contain historic parkland associated with Arlebury Park*' (para 3.2) cannot be relied upon as an accurate assessment of the potential impacts of development on this site and its local character area.
- 4.8 In view of the above, I am unable to agree with the conclusions as set out in paragraphs 4.1 and 4.2 and would maintain that the LSA assessment of moderately sensitive for this site is fully justified.

5.0 Conclusion

- 5.1 The introduction of residential development on omission sites 278: 2552:2532: 2553: 1927 is considered to be contrary to landscape character and sensitivity policies and guidance, resulting in significant adverse change which is likely to be harmful to the landscape and its enjoyment, particularly where valued by the local community.
- 5.2 The selection of site 277 (land east of Sun Lane) for development is considered appropriate in landscape terms and suggestions by some respondents that other sites are less sensitive shows a misunderstanding of the landscape appraisal process.

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