

Ms R Morton
Planning department
Winchester City Council
City Offices
Colebrook Street
Winchester
SO23 9LJ

30 July 2012

Our ref: 157111F/AB

Dear Ms Morton

Updated comments to Pre-submission Local Plan Part 1 in relation to North Whiteley

We write on behalf of our client, the North Whiteley Consortium, to provide updated comments to our original representations to the Pre-submission Local Plan Part 1, (submitted via email on 12 March 2012, further copy attached) following WCC's final pre submission changes. We welcome a number of proposed modifications, in particular the additional text providing clarity for the North Whiteley development (policy SH3) in order to avoid the need for a future Area Action Plan. There are however, a number of additional comments that we feel are necessary to improve the robustness of the Local Plan Part 1, whilst it is disappointing to note that a number of our previously suggested changes appear to have been overlooked.

Paragraphs 2.21 – 2.24

We note that the wording of the following paragraphs has been fully revised to provide a broad overview of the development strategy for the three sub-areas of the Winchester District. As with our previous comments raised towards paragraph 2.24 we feel that this section could still be more positive as such development can bring a number of benefits including housing, community facilities and address existing deficiencies.

In addition, as per our previous comments relating to paragraph 2.23, the proposed text does not place sufficient importance on the potential for impacts from development on local character, landscape, infrastructure, wildlife and sensitive habitats to be mitigated by suitable measures, which will be informed by a full assessment of impacts. The sentence relating to the scale of development relating to South Hampshire Urban Areas should be reworded to:

Planning
Design
Environment

This scale of development will inevitably impact With this scale of development there is potential to impact on the existing character of the locality and on the landscape, infrastructure, wildlife and sensitive habitats.

As per our previous representation, the reference to “*separate dog walking areas*” in paragraph 3.53 should be replaced by “*separate multi-use area to including dog walking*”, in line with the evolving Draft Green Infrastructure Strategy for North Whiteley. There is no intention to have areas within the green infrastructure where access will be restricted to dog-walkers only as this is not the preferred approach of Natural England and other relevant bodies.

We are concerned that paragraph 3.55 remains unchanged and still states that North Whiteley will provide health facilities. As per our previous representation, health facilities could be provided at North Whiteley, however GP's at the Whiteley Surgery have confirmed that there is more than adequate capacity at the existing surgery to provide health services to the future residents of North Whiteley. Therefore it is not anticipated that new GP facilities will be required within the North Whiteley development and this reference should be deleted from paragraph 3.55.

Policy SH1

The North Whiteley Consortium broadly supports the vision for the South Hampshire Urban Areas. However, at the third bullet the policy requires North Whiteley to provide 40% affordable dwellings. The policy should not commit to the provision of 40% affordable dwellings but should acknowledge that suitable provision of affordable housing be based on identified local need, viability and other infrastructure requirements.

Policy SH1 should reflect the flexibility in Policy CP3 which states, “*all development which increases the supply of housing will be expected to provide 40% of the gross number of dwellings as affordable housing, unless this would render the proposal economically unviable*”.

Policy CP3

The North Whiteley Consortium continue to support the approach to considering viability in relation to meeting a target of 40% affordable housing provision for market led residential development proposals.

Policies CP11 and CP12

As no changes have been made to policies CP11 and CP12, our points of concern, as raised in our previous representation, remain:

- 1. The requirement for Code for Sustainable Homes level 5 energy standards from the point of adoption of the draft Core Strategy is highly demanding, largely untested, and would inevitably place a significant burden on development;**

- 2. The allowance for 30% offsite provision implies at least 70% onsite – this is an untested quantity and one that both theory and practice (ie no market-led examples at scale as yet) demonstrate to be extremely challenging;**

- 3. The policy, supporting wording and evidence base talk about a financial contribution to a local authority fund for any residual emissions. This is only one of the ‘allowable solutions’ consulted on by the Zero Carbon Hub. The wording should allow for other solutions to avoid being overly prescriptive, and thus be more aligned with the spirit of national guidance;**

- 4. The national standard for zero carbon homes by 2016 was significantly changed in the budget in 2011. It is quite likely that it is significantly altered again before 2016, leaving the policy wording out-of-date;**

- 5. BREEAM Outstanding is very demanding, largely untested and uncostered. The evidence base supports this view.**

Policy SH3

As stated previously, we welcome the inclusion of additional explanatory text in relation to the North Whiteley allocation (policy SH3) for clarity, to avoid the need for an Area Action Plan at a later stage. Our comments on updated Policy SH3 have been made using track changes, for clarity and ease of understanding.

Development to the north of Whiteley provides the opportunity to secure important infrastructure and community facilities, and to locate new residential development close to major employment areas. In particular, development in this location provides the opportunity to complete the Whiteley Way as a new road primarily aimed at serving the new development, but which will provide a new northern link to the Botley Road. The development should also provide for a new secondary school and two new primary schools which, in addition to meeting the needs of the new development, will also serve to meet existing shortfalls in educational facilities in the local area.

Jo Smithers 30/7/12 10:50

Comment: For increased clarity

The overall site area is approximately 202 hectares, of which around half is either constrained or required to mitigate potential environmental impacts. This significantly reduces the developable area, but the site should be capable of delivering at least 3,000 new dwellings. The final figure may exceed 3,000 and this will be dependant on the preparation of a comprehensive masterplan, based on sound urban design principles, and the ability of the site to either avoid or mitigate its potential environmental impacts.

Jo Smithers 30/7/12 10:50

Comment: For increased clarity, the development is not intended to meet demands from further afield, such as strategic housing development at Hedge End.

The development will be expected to provide a range of housing types and be aligned with the housing requirements needed to support the existing employment opportunities in the locality. Particular attention should also be paid to the need to cater for an increasingly ageing population, and a range of housing options should be provided aimed at meeting the varying needs of the elderly. A percentage of the housing should be affordable in line with the Council's affordable housing aspirations, although local needs, viability and provision of other social infrastructure will serve to inform the final level of provision. The Sustainability Appraisal and the Habitats Regulations Assessment identify a number of potential risks to internationally important sites, particularly the Special Protection Area on the Upper Hamble. This will require a full package of measures to be implemented to either avoid or mitigate harmful impacts. This will also include off-site measures to improve access to, and the management of, Whiteley Pastures.

Jo Smithers 26/7/12 14:29

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Jo Smithers 30/7/12 10:50

Comment: To allow for a suitable level of flexibility

The mitigation measures will need to be consistent with both the PUSH Green Infrastructure Strategy, and as far as practicable the Solent Disturbance and Mitigation Project, though it should be noted that the timing of publication of this is not fixed and may come after a formal planning application is progressed. The full package of measures should

Jo Smithers 26/7/12 14:32

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Jo Smithers 30/7/12 10:50

Comment: It is not possible for the North Whiteley Consortium to fully agree to the measures set out within the Solent Disturbance and Mitigation Project, without knowledge of its contents.

demonstrate that harmful impacts on any European site would be avoided or adequately mitigated.

A comprehensive green infrastructure strategy will be required to support any proposals for development. This will need to show how a network of multi-functional open spaces and links will be integrated into the development area to achieve a range of aims including a net gain in biodiversity, helping to mitigate or avoid potential risks to protected sites of European importance, and providing the necessary buffers between these sites and the development. In addition, the green infrastructure will provide for recreational open space provision including children's play, allotments and multi-use areas to include dog walking, in recognition of the site's proximity to protected European sites. Development should also incorporate a sustainable drainage system and maximise the advantages of the site's landscape setting, including existing trees and hedgerows. A key feature will be to ensure that the development area links with the adjoining countryside and creates an enhanced recreational experience for adjoining communities.

Jo Smithers 30/7/12 10:50

Comment: Not necessary

Jo Smithers 26/7/12 14:38

Deleted: , otherwise the scale of the development would need to be reduced accordingly

Jo Smithers 30/7/12 10:50

Comment: The North Whiteley draft Green Infrastructure Strategy does not include areas within the green infrastructure where access will be restricted to dog-walkers only.

Jo Smithers 26/7/12 14:40

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Initial transport assessments undertaken during the preparation of this Plan, indicate the need for a range of mitigation measures in order to reduce the traffic impact on both the local and strategic network, including improvements to junction 9 of the M27 motorway, junction improvements and traffic calming as required to the local network. A key feature of this development is to achieve the completion of Whiteley Way. In addition, a package of smart choices aimed at providing a genuine modal shift away from the private car to more sustainable modes of transport is needed through the preparation of a public transport strategy to include potential bus subsidies and links with local rail connections.

The development will be required to provide a range of social infrastructure to meet the needs of the new community, including two new local centres with multi-functional community buildings and, educational facilities.

Jo Smithers 30/7/12 10:50

Comment: GP's at the Whiteley Surgery have confirmed that there is capacity at the existing surgery to provide health services to the future residents at North Whiteley, therefore now additional health facilities are required.

Jo Smithers 26/7/12 14:43

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Policy SH3 - Strategic Housing Allocation – North Whiteley

Land to the North of Whiteley (as shown on the following map) is allocated for the development of about 3,000 dwellings together with supporting uses. The development should reflect Whiteley's predominantly wooded character and setting by maximising the opportunities presented by the substantial areas of green space within and adjoining the allocated area, which are either unsuitable for built development or needed to mitigate potential impacts on protected sites.

Development proposals should be accompanied by a comprehensive masterplan which includes an indicative layout and phasing plan, and sets out details of how this will be achieved.

The development should also complement and take advantage of facilities

in the nearby town centre and major employment at the Solent Business Parks. It should accord with Policy DS1, in addition to the following site-specific requirements:

- protect and enhance the various environmentally sensitive areas within and around the site, avoiding harmful effects or providing mitigation as necessary. This will include any measures as necessary to mitigate the impact of noise and light pollution on the adjoining areas. The existing woodlands on and adjoining the site should be used to create attractive neighbourhoods with a distinctive sylvan character, provide recreational facilities including areas for children's play.
- make space available for pre-school facilities, and provide two additional primary schools and a secondary school to accommodate the development, along with other physical and social infrastructure (as illustrated in the Infrastructure Delivery Summary at Appendix E).
- provide a comprehensive assessment of existing access difficulties affecting Whiteley, agree solutions prior to planning permission being granted, and incorporate specific proposals to ensure that these are implemented at an appropriate stage of the development;
- undertake a full Transport Assessment to ensure that the package of mitigation measures are incorporated into the scheme, including pedestrian and cycle links, a public transport strategy and any off-site contributions as deemed necessary;
- complete Whiteley Way at an early stage of development, in an environmentally sensitive manner which does not cause undue severance for the new community or encourage traffic from adjoining areas to use the new route to gain access to the strategic road network.
- provide measures to ensure that smarter transport choices are made to achieve a modal shift which minimises car usage, manages the impact of private cars on the highway network, and implements measures necessary to accommodate additional traffic. These should improve Whiteley's level of self containment and make a significant contribution towards reducing commuting levels;
- undertake a full assessment of the impact on interest features of those sites of international importance such as the River Hamble and the Solent both alone and in combination with other plans and protected sites.
- include a Green Infrastructure Strategy which sets out measures to avoid harmful impacts and mitigate the local and wider impacts of the development. The strategy will also need to include any off-site measures required to mitigate harmful impacts on European sites.

Jo Smithers 30/7/12 10:50

Comment: It is not clear how "improve biodiversity" could be measured and whether it would be necessary to compare against the baseline situation. This phase is open to wide interpretation and should be removed. In addition the Forestry Commission has confirmed that woodfuel is not commercially viable as they are unable to provide the level of fuel that a development of this size would need.

Jo Smithers 26/7/12 14:45

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Jo Smithers 30/7/12 10:50

Comment: GP's at the Whiteley Surgery have confirmed that there is capacity at the existing surgery to provide health services to the future residents at North Whiteley, therefore now additional health facilities are required.

Jo Smithers 26/7/12 14:48

Deleted: , including provision for primary health care in the locality to serve the new community;

Jo Smithers 30/7/12 10:50

Comment: The bullet needs to be reworded to ensure that specific proposals, which will provide solutions to existing access difficulties at Whiteley, are provided at the appropriate stage of the development.

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Jo Smithers 30/7/12 10:50

Comment: For clarification and to prevent confusing Appropriate Assessment requirements and EIA

Jo Smithers 26/7/12 14:51

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- avoid harmful impacts on water resources, given the proximity of the site to European sites of nature conservation interest. The development should provide a fully integrated Sustainable Drainage System to mitigate against any potential flood risk and apply a flood risk sequential approach to development across the site;

Proposals for the development of this site are being prepared, with a number of technical studies completed and various community engagement exercises undertaken, prior to the submission of a planning application. The housing trajectory set out below expects that this site will start to deliver housing in 2015/16 and that this will continue over a 15 year period, rising to 300 dwellings per year at the peak of development. If at some point in future it becomes clear that the site is failing to deliver the level of housing proposed, the implications for the Council's ability to ensure adequate housing land supply across the District will be assessed. It may be that other sources of supply can maintain adequate housing provision or it may also be necessary to bring forward additional sites for housing purposes in accordance with the development strategy established in this Plan. This will be undertaken through the production of Local Plan Part 2 or subsequent reviews.

The schedule at Appendix E summarises the **likely** infrastructure requirements for this large site, including expected funding sources and timescale for provision (these may be subject to change or updating over time). This site will require a range of transport related infrastructure as specified in the policy including new roads/ junctions to serve the development and off-site highway improvements to mitigate the traffic impacts, to be determined in detail through a full transport assessment. Footpaths and cycle routes will also be required to provide pedestrian and cycle access and integrate with adjoining areas. Land should be laid out for open space, recreation and green infrastructure and can help contribute to the measures that will be needed to avoid and mitigate the impacts of development on nearby nature conservation sites. Two local centres will be needed given the size and shape of the site, which **could** include small-scale shops, workspace, community buildings **and** education **(sizes and uses to be established)**. **Given the location relative to the main town centre the southern local centre is likely to be of a smaller scale.** Due to shortfalls in both primary and secondary education locally these facilities should be brought forward at the earliest opportunity.

Infrastructure and facilities will be provided through partnerships between the developer and the various service providers at particular stages of the development, as specified in the planning conditions and obligations set when planning consent is granted."

Jo Smithers 30/7/12 10:50

Comment: It is understood that North Whiteley is identified as a Clay Minerals Safeguard Area on the Hampshire CC Minerals and Waste Plan pre-submission proposals map. These areas are protected under Policy 15 which permits development within prior extraction of minerals for a number of reasons, including if:

2. it would be inappropriate to extract mineral resources at that location, with regards to the other policies in the Plan; or
4. the merits of the development outweigh the safeguarding of the mineral.

The policy is to prevent 'needless development', and it is felt that the need for the development of North Whiteley would far outweigh the safeguarding of the mineral. Such a view has been reiterated by HCC.

Jo Smithers 26/7/12 14:53

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Jo Smithers 30/7/12 10:50

Comment: The North Whiteley Consortium cannot guarantee that all of the infrastructure requirements for the site are known at present.

Jo Smithers 30/7/12 10:50

Comment: GP's at the Whiteley Surgery have confirmed that there is capacity at the existing surgery to provide health services to the future residents at North Whiteley, therefore now additional health facilities are required.

Jo Smithers 26/7/12 14:59

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Jo Smithers 30/7/12 10:50

Comment: For clarity

In addition, if the proposals map for North Whiteley (29N) is to be updated, we request to review the red line before it goes to the inspector, to check that it is accurate in accordance with our records. We thank you for this opportunity to comment further and sincerely hope that you are able to acknowledge the above comments in the examination process of the Local Plan. Please do not hesitate to contact us should you have any queries with the comments raised.

Yours sincerely



Adrian Barker
Technical Director

Enc. Representations made to pre-submission local plan (12 March 2012)