

CABINET

23 March 2005

CONSULTATION ON DRAFT SOUTH EAST PLAN

REPORT OF DIRECTOR OF DEVELOPMENT SERVICES

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RECENT REFERENCES:

“PUSH – Partnership for Urban South Hampshire”. Cabinet 13 Oct 2004, CAB947

EXECUTIVE SUMMARY:

The South East England Regional Assembly (SEERA) has published the draft South East Plan for consultation. This is a draft ‘regional spatial strategy’, which SEERA is required to produce under the new planning system. Comments on the Plan are required by 15th April 2005 and this report recommends that various comments be agreed on behalf of the City Council.

With regard to South Hampshire, there is a great concern about the ability of the area to accommodate some of the higher levels of growth being promoted. Under these options, much of the growth would be in ‘fringe’ Districts like Winchester. For the ‘rest of Hampshire’ area the implications of the various potential levels of growth are easier to establish and a mid-range level of growth (about 1000 dwellings per annum) appears appropriate. There are various concerns about the detailed wording of policies and omissions in certain areas. The comments which it is recommended be made to SEERA by the City Council are set out in Appendix 2 to the report.

RECOMMENDATIONS:

1. That SEERA be thanked for consulting the City Council on the South East Plan and congratulated on its production.
2. That the recommended comments to SEERA on behalf of Winchester City Council contained at Appendix 2 be agreed and submitted before the deadline of 15 April.
3. That the Chief Executive be given delegated authority, in consultation with the Leader of the Council, to make limited changes and additions to the comments in Appendix 2 to reflect key points raised in consultation and not already addressed in this report.

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CONSULTATION ON DRAFT SOUTH EAST PLAN

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DETAIL:

1 Introduction

- 1.1 The new planning system introduced by the Planning and Compulsory Purchase Act 2004 replaces the current development plan arrangements of Structure Plans and Local Plans with a new system of Regional Spatial Strategies (RSS) and Local Development Frameworks (LDF). Regional Spatial Strategies are to be produced by Regional Assemblies; the South East England Regional Assembly (SEERA) in the case of the South East. County Councils will no longer produce Structure Plans, although they do have a statutory requirement to assist in the production of RSS.
- 1.2 District Councils will be responsible for producing Local Development Frameworks, which must accord with the relevant RSS. The South East Plan is the name that has been given to the RSS for the South East of England and the City Council's LDF will, therefore, need to conform to the requirements of the South East Plan once it is adopted.
- 1.3 SEERA has published the draft South East Plan for consultation. This is the draft 'regional spatial strategy', which SEERA is required to produce under the new planning system. Comments on the Plan are required by 15th April 2005 and this report highlights some of the main issues raised by the South East Plan and recommends that various comments be agreed on behalf of the City Council. Copies of the full South East Plan, including a separate sustainability appraisal have been placed in the Members Rooms, Planning Reception and local libraries, and all the documentation can be viewed at <http://www.southeast-ra.gov.uk/southeastplan/index.html>
- 1.4 The current 'Phase 1' consultation is on the general policies and strategy of the South East Plan. Although the final Plan will set District-level housing requirements and other strategic-scale development requirements, this version does not extend to that level of detail. These matters are still the subject of technical work and the intention was to hold a 'Phase 2' consultation on these matters in July 2005. It now seems likely that the local authorities, who have been asked to produce draft District-level distributions, will also be expected to consult on these so that the period for undertaking this work is expected to be extended to the autumn. However, SEERA's intention remains formally to submit the whole Plan to the Secretary of State in November 2005.
- 1.5 County and Unitary Councils have a responsibility to assist in the preparation of RSS and Hampshire County Council, Southampton City Council and Portsmouth City Council have been doing this. The Partnership for Urban South Hampshire (PUSH), which also includes affected District Councils including Winchester, has developed the strategy for the South Hampshire

Sub-Region. Hampshire County Council has worked with the relevant Districts on the 'rest of Hampshire' area and submitted proposals for that area. The local authorities have, therefore, had some input to the development of the RSS, both through this mechanism and through their representation on SEERA itself.

2 Consultation Arrangements

- 2.1 The South East Plan was published on 24th January 2005 and comments on it are to be submitted by 15th April. A series of 'Spring Debates' were held on the emerging issues for the Plan in Spring 2004, involving mostly stakeholders rather than the general public. SEERA has also commissioned public opinion surveys from MORI and has distributed leaflets by post to every household in the South East. This leaflet includes a questionnaire survey which can be returned to SEERA.
- 2.2 SEERA is relying on local authorities to help publicise the Plan and the City Council has sent publicity material on it to all Parish Councils and main amenity groups in the District. It has also organised or helped to organise public meetings in 6 venues around the District and a 'business breakfast' in association with the Hampshire Economic Partnership. At the time of writing this report, only a few of these events had taken place, although attendance at these has been good and attendees seem to have found them useful.
- 2.3 The issues raised at the public and business meetings have helped inform this report and the comments which it is recommended be made to SEERA. However, as not all the meetings have yet been held, and the Winchester public meeting will not be until after Cabinet, it is recommended that authority be delegated to the Leader of the Council and the Chief Executive to evolve any comments so as to take account of issues raised at such events.

3 Content of the South East Plan

- 3.1 The South East Plan consists of a folder of documents as follows:

- Core Document
- Draft Sustainability Appraisal
- Implementation Plan
- Indicators & Monitoring
- Executive Summary

It is the Core Document which sets out the proposed strategy and policies for the area and which this report concentrates on. The other documents are intended to provide additional or supplementary information or studies, particularly to meet sustainability requirements.

- 3.2 The Core Strategy is divided into 5 sections. There are brief sections (A & B) on 'Challenges' and 'Context' and a more substantial section (C) on 'Strategy Options and Sustainability'. However the bulk of the document is formed by sections D and E on 'The Regional Policy Framework' and 'The Sub-Regional Policy Framework' respectively. It is these sections which set out the Plan's policies, both generally and for the 9 sub-regions.
- 3.3 Section C (Strategy Options and Sustainability) sets out a 'core strategy' based on 4 principles, which include the aim of achieving 3% per annum economic

growth (GVA) and seeking assurances about infrastructure provision to accompany new development. Section C also considers strategic options, especially for the scale of housing development. The Plan consults on 3 alternative scales of housing growth:

- 25,500 dwellings per annum (average growth rate 1999-2004)
- 28,000 dwellings per annum (growth rate in 2004)
- 32,000 dwellings per annum (reflecting forecasts and migration)

It also consults on 2 spatial options; 'continuation of current policy' which reflects the distribution of development in the current regional planning guidance (RPG9), and 'sharper focus' which focuses development on those areas with strong economic potential and areas with a particular need for regeneration.

- 3.4 As a result 6 potential levels of housing provision for each sub-region and County area are being consulted on (3 growth levels x 2 spatial options). These are set out in a Table (C2), which is reproduced at Appendix 1.
- 3.5 Section D of the Plan sets out the Plan's general policies on various topic areas:- Cross-Cutting, Economy & Tourism, Housing, Communications & Transport, Sustainable Natural Resource Management, Countryside and Landscape Management, Management of the Built & Historic Environment, Town Centres, Social Cultural and Health Dimensions. There are over 100 policies in this Section in total, although 34 of these relate to minerals, waste and energy efficiency, which are subject to separate changes to RPG9 and are reproduced for information only. Nevertheless, in view of the number of policies involved, a description of the policies is not set out in this report and the following section highlights only the main areas of likely interest or concern to the City Council.
- 3.6 Section E sets out the Sub-Regional Policy Framework, with sections on each of the 9 Sub-Regions, plus the Isle of Wight. The sub-regions include South Hampshire (Section E1) and the Western Corridor and Blackwater Valley (Section E6). The Western Corridor does not impinge at all on this District, although it does include much of Basingstoke and Deane Borough and all of Hart District and Rushmoor Borough. The South Hampshire Sub-Region covers the 'city regions' of Southampton and Portsmouth and extends as far north as the southern edge of the proposed South Downs National Park. It therefore includes large parts of Winchester's southern parishes and is of great relevance to the City Council. The Plan contains the strategy submitted by PUSH, which includes a range of economic-led growth options, including 4 potential levels of overall housing provision.

4 Commentary and Recommended Response

- 4.1 This section comments on the South East Plan's policies and development options and recommends how the City Council should respond. Because of the number of policies in the Plan, only those which raise issues which it is considered require comment are highlighted.

General

- 4.2 The timescale for the preparation of the South East Plan has been extremely short (by normal planning strategy standards) and the resulting Plan is generally very comprehensive and well thought-through given the limited time available to produce it. It is, therefore recommended that SEERA be congratulated generally on the Plan.
- 4.3 However, the Plan is, if anything, too comprehensive, in that it contains a large number of policies, many of which do not deal uniquely with spatial issues in the South East or have a strong South East dimension. Some of the policies simply reflect published Government planning guidance and could be applied throughout the country, not just in the South East. A number of the Plan's policies, therefore, add little to existing guidance and could be removed. It is, therefore recommended that SEERA should review the necessity for all of the policies that the current version of the Plan contains.

Cross-Cutting Policies

- 4.4 While many of the cross-cutting policies are not necessarily South East-specific, policy CC4 warrants particular mention and support. This seeks to tie the release of land for new development to the capacity of the existing infrastructure to accommodate it and to the provision of necessary new infrastructure. This is a particularly important theme which has been raised in all the public/business meetings held so far. Accordingly, it is recommended that policy CC4 be strongly supported.
- 4.5 In addition, policy CC7, which promotes an 'urban focus' is also considered particularly important, especially in the context of the proposals for South Hampshire. This approach is also reflected in housing policy H3 and together these should be supported.
- 4.6 Policy CC8 proposes a series of sub-regions, where the emphasis tends to be on growth, regeneration and economic opportunity. There is an argument for defining a sub-region for the South Downs, in view of its possible designation as a National Park. However, as this is currently not certain, and in view of the growth implication that tends to be attached to the sub-regions, it is not recommended that this or any other new sub-regions be suggested by the Council.

Economy and Tourism

- 4.7 The Plan promotes sustainable economic growth, which is in general to be supported. One of the issues arising from the meetings with business representatives is the need to facilitate rural businesses and provide for their needs, including an available workforce. Policy RE1 promotes this but tends to be very urban-centred. While the last part of the policy relates to support for rural businesses, it appears as an afterthought. It is recommended that objection be raised to the lack of the policy specifically on the rural economy and one which more closely reflects the policy approach that rural businesses need to be successful. The Hampshire Economic Partnership is likely to undertake further work to identify what their expectations of such a policy might be.

- 4.8 There is a large section on tourism development, which reflects proposed alterations to RPG9. Whilst this section is perhaps excessively detailed, it is accepted that it is being progressed separately and no further comments therefore need to be made at this stage.

Housing / Sub-Regions

- 4.9 The South East Plan's Housing policies will include a District-level distribution of housing requirements. However this has not yet been produced and this will be done before the submission of the Plan to Government in the autumn. There will, therefore, be an opportunity to be involved in this, through work being led in Hampshire by the County Council. In the absence of a more detailed assessment of the implications of the various housing and growth options contained in the Plan, it is very difficult to make any sensible response on the question of the overall housing options. The only point that it is recommend should be made is that the 'sharper focus' option appears the only sensible basis for planning the area: there seems no point in producing a Regional Spatial Strategy, which identifies a series of sub-regions, if those sub-regions and the strategies for them are not reflected in the overall South East Plan's strategy. The 'continuation of existing policy' option would be inappropriate given that the Plan proposes a revised policy approach.
- 4.10 The housing distribution options (see Table at Appendix 1) include 2 areas which contain parts of Winchester District: the South Hampshire Sub-Regional Strategy area and the 'rest of Hampshire area. As with the wider housing options, it is difficult to comment on the implications of the options within these areas in the absence of more detailed analysis of sub-regional needs and opportunities. However, some 'interim' recommendations are made below.

South Hampshire

- 4.11 With regard to South Hampshire, the 'sharper focus' range of provision is 2900–4000 dwellings per annum (58,000–80,000 dwellings over 20 years). The Partnership for South Hampshire's (PUSH) preferred level is 79,000–82,000 dwellings, i.e. the top end of the range. Of this it is estimated that 47,000–56,000 dwellings can be provided through existing commitments and urban capacity. These figures were based on initial technical work regarding the level of housing provision that is needed to support the scale of economic growth that the PUSH authorities wish to see. Further work on this is continuing, which may result in other housing provision levels, and PUSH officers and Members are looking at the distribution options for the various potential levels of housing.
- 4.12 This work is based on the options for the South Hampshire Sub-Region, as set out in Section E of the South East Plan. It is clear from the figures above that, at the lower end of the range, a high proportion of the housing could be met on existing commitments/urban capacity sites, with the need for only limited new allocations. In accordance with the PUSH strategy, such releases would be likely to be adjoining the main urban areas, rather than having a significant effect on 'fringe' Districts such as Winchester. However, the higher the overall level of housing, the greater the proportion that would need to be on 'new' greenfield allocations and the stronger the argument for 'Strategic Development Areas' (SDAs) and/or development in transport corridors. Because of the more limited scope to extend the existing urban areas these options are likely to be partly or wholly within fringe Districts.

- 4.13 The South East Plan refers to the PUSH preferred housing provision of 79,000-82,000 dwellings in policy SH.11 but does not set out a preferred distribution strategy. Technical work on the overall housing provision and the various means of accommodating it is ongoing. Therefore, at this stage it is recommended that the City Council should object to policy SH.11 on the basis that insufficient work has been undertaken to justify this level of provision or test its impact. In particular, there is a serious concern that the 'bottom-up' work that is needed to test the overall figure, and the environmental assessments of options that the new planning system requires, have not been undertaken. Therefore, it is recommended that, rather than produce an alternative figure, which would be equally unfounded at this stage, the City Council should set out a series of principles which it would expect to form the basis of the strategy for the South Hampshire area:
- Housing growth should be promoted only as a result of economic development/regeneration needs and should be phased so as to ensure that it contributes directly to the achievement of the economic growth targets in the Plan;
 - The strategy should be urban-centred, with economic and housing growth within or immediately adjoining the sub-region's large urban areas, where the greatest needs exist in terms of deprivation and regeneration.
 - Development beyond that within or adjoining the existing urban areas should only be contemplated if the scale of development required to meet the sub-region's needs necessitates large scale alternatives such as Strategic Development Areas or development within transport corridors.
 - The infrastructure needed for any Strategic Development Areas or transport corridors should be established and provided at an early stage and infrastructure needs and the prospects of delivery should form a key component of the work on strategy/site selection process;
 - Further work is needed on various aspects of the potential large-scale development options, including feasibility, environmental impact, sustainability appraisal, infrastructure requirements, etc. This should inform a 'bottom-up' assessment of the options, alongside the 'top-down' strategy-led approach.
- 4.14 The South East Plan's policies for the South Hampshire sub-region generally reflect the principles above, although they start from the assumption that SDAs will be needed. In view of the lack of testing that has been done, it cannot be assumed either than the overall housing target promoted by PUSH will be appropriate or that SDAs will be the best way to accommodate the final requirement. Accordingly, the City Council should object to policy SH.2, which relates to SDAs.
- 4.15 Importantly, policy SH.3 recognises the need for an implementation agency to deliver the growth proposed in a sustainable way and this is to be strongly supported. Policy SH.4 acknowledges the need to monitor economic growth rates, etc and to phase the development of any SDAs accordingly, which is also worthy of support.
- 4.16 As well as housing, the sub-regional strategy also promotes the development of 400-500 hectares of employment land, with further details to be developed as part of the sub-regional strategy. It is recommended that the principles outlined above should be applied to employment development also, especially in view of the scale of the land requirement set out (400-500 hectares would accommodate 12,000-20,000 dwellings at 30-40 dwellings per hectare).

Indeed, it is understood that further work on employment needs may indicate a need for up to double this requirement.

- 4.17 Policy SH.12 seeks a minimum of 28,500 affordable homes over the Plan period, equating to about 35% of the preferred level of housing development. Given that affordable housing will not be achieved on all sites, this would in practice require a higher target for provision on a site-by-site basis. Although challenging, this emphasis on affordable housing provision is to be welcomed.

'Rest of Hampshire'

- 4.18 The proposed level of housing provision for the 'rest of Hampshire' area under the 'sharper focus' option is 700-1000 dwellings per annum (14,000-20,000 dwellings over the Plan period). It is immediately noticeable from the Table at Appendix 1 that this is at least double any other 'rest of' county area figure, bringing into question the reliability and appropriateness of the requirement. It is recommended that SEERA should be asked to reconsider the 'rest of' county figures, not necessarily to significantly reduce the Hampshire figure, but to look at whether the very low figures for many other county areas will actually meet the economic and housing needs of those areas in a sustainable way. It may be that higher 'rest of county' figures for some counties may relieve pressure on some of the sub-regions.
- 4.19 Work on the options for distributing these ranges of requirements suggests that the lower end of the range (14,000 dwellings) equates roughly to the level of housing that could be developed on committed sites and through urban capacity. This could, therefore, be equated to carrying forward existing policies, with generally tight settlement boundaries but significant development within the larger built-up areas such as Winchester, Andover and Petersfield. Given the generally very rural nature of the rest of Hampshire area, any significant increases in the requirement would soon start to require fairly major development options such as releasing the existing reserve provision from the County Structure Plan (including Winchester City North MDA), further large-scale expansion of the larger settlements (realistically this is likely to mean Winchester and Andover), major expansion of smaller settlements such as Whitehill/Bordon, or completely new settlements.
- 4.20 The scale of such provision that would be needed to meet the upper end of the range is such that it could require a combination of all the above options and would effectively turn the rest of Hampshire area into a sub-regional growth area and require it to have its own sub-regional strategy. It is therefore recommended that the City Council objects to any requirements at the upper end of the scale referred to in the South East Plan on the basis that this level of growth would be incompatible with a relatively sparsely populated rural area with no large urban areas and major landscape and other constraints to such a scale of development (including 2 existing/proposed National Parks). Rather, the strategy for this part of the County should be to meet local needs, but to otherwise limit development, to ensure it retains its role and character as a rural 'buffer' between the sub-regional growth areas of South Hampshire and the Western Corridor/Blackwater Valley. Indeed, there is a case for defining the area as a 'gap' of regional significance, which should be recognised in the South East Plan.
- 4.21 The housing needs of the 'rest of Hampshire' area are actually very limited, due to the relatively small and aging population ('zero net migration' would actually

lead to a population decrease). Nevertheless, there are clearly very substantial needs for affordable housing provision, both to meet existing requirements and future demands, as well as a need to avoid a declining population and to meet local economic needs. While further work is needed on the implications of various levels of growth, it is proposed that the City Council should provisionally support a level of growth of up to 1,000 dwellings per annum (the upper end of the 'sharper focus' range), rather than the very high levels proposed under all of the 'existing policy' options. This may give significant scope for the relaxation of existing settlement boundaries and/or planning policies to cater for local needs, especially for affordable housing, without requiring a scale of development that is incompatible with the area's essentially rural character and 'buffer' function.

- 4.22 The South East Plan's policy H.4 sets an overall regional target of 35-40% for affordable housing, 25% for social rented accommodation and 10-15% for other forms of affordable housing. As with the figures for South Hampshire, this will require a higher site-by-site target if it is to be achieved, but the aim of increasing affordable housing provision to this level is to be welcomed. A target is also set for housing densities, at 40 dwellings per hectare for the region as a whole. Given the much higher densities likely to be achieved in urban areas and some development areas, such a target is not likely to require unreasonably high densities in other areas such as existing smaller towns and villages.

Transport

- 4.23 The Plan's Communications and Transport section sets out a series of policies which are considered generally consistent with Government guidance and the transport policies adopted by Hampshire County Council and the City Council. The only policies which are considered to be of potential concern are T.6 (Airports) and T.14 (Rail Freight). Policy T.6 encourages Southampton Airport to 'sustain and enhance its role as an airport of regional significance' and the explanatory text refers to giving priority to improving the airport's accessibility and taking this into account in future spatial strategies. Given concerns in this District about the disturbance caused by existing flight paths, it is recommended that SEERA be asked to include reference in the Plan to the need for adequate account to be taken of the environmental impact of airport expansion.
- 4.24 Policy T.14 refers to the need to increase the use of rail for freight traffic and to increasing the capacity of various corridors, including the Southampton to West Midlands corridor (1st priority) and the Portsmouth to Southampton/West Midlands corridor (4th priority). Depending on whether any physical improvements are required and the nature of them, these proposals could impact significantly on the District. Once again, it is recommended that appropriate account is taken of the environmental implications of improvements to these corridors, including for people living near the lines concerned.

Sustainable Natural Resource Management

- 4.25 This section sets out a range of policies on natural resources, including waste (already the subject of alterations to RPG9). The policies are generally to be welcomed. Policy NRM.1, relating to water resources and river quality, is of particular note. The policy requires account to be taken of water quality and capacity, which is to be supported, but concern has been raised through public

consultation about the impact of the scale of development being promoted through the South East Plan on water infrastructure and the water environment. It is therefore recommended that the City Council raises this issue in its comments to SEERA and points out that it is a matter to be considered in establishing the scale and location of development at the regional scale, through the South East Plan.

Countryside & Landscape Management

- 4.26 This very short section contains only 3 policies, one of which is on the New Forest National Park, another on Areas of Outstanding Natural Beauty (AONBs) and the third on management of the remaining countryside. Although there are policies in the other 'topic' sections which relate to the countryside, the general lack of attention to rural policies and issues is a major area of concern. It highlights the South East Plan's over-emphasis on urban issues, a point which has been raised through consultation, including by business interests in relation to the 'rest of Hampshire' area.
- 4.27 The first concern is that the policies are actually technically incorrect in giving a higher priority to protection and conservation of the New Forest National Park than to Areas of Outstanding Natural Beauty. PPS7 makes clear that National Parks and AONBs should all have the highest level of landscape protection. Whilst there is a different emphasis on recreation provision between National Parks and AONBs, the level of protection conferred should be equal in both policies and there may be scope for combining policies C.1 and C.2.
- 4.28 Policy C.3 relates to 'open countryside' outside the National Park and AONBs. Although its aims are generally appropriate (protection of distinctive qualities, sustainable land management, etc) the reference to 'open countryside' is considered inappropriate. The policy should make it clear that Local Development Frameworks will need to distinguish between built-up areas and the countryside (as existing local plans do) and that the aims referred to above should apply within 'the defined countryside'.
- 4.29 It is also recommended that this section needs to include a policy relating to the approach to development in the countryside. Although there are references in the housing, economy, etc sections to development in rural areas, there should be a policy which is clearer about the strategy for development in rural areas. In line with the urban-centred approach of Government policy and the South East Plan, significant development should be directed primarily to the urban areas, but there also needs to be a recognition that change and development will be needed in the countryside and rural settlements to meet local needs. This will particularly need to include provision for affordable housing and sustainable small-scale business development, including within the National Park and AONBs.

Built & Historic Environment

- 4.30 Policy BE.3 deals with the urban/rural fringe. As this tends to relate mainly to issues outside built-up areas it is considered that it would more appropriately be included in the Countryside and Landscape Management section. Policy BE.3 (iii) refers to the need to be proactive in identifying opportunities for sustainable development in urban fringe areas. This is considered to be too promotional of development, especially when many urban fringe problems are caused by speculation in and neglect of urban fringe land, resulting from the

hope of future development. Whilst there are clearly some urban fringe areas that will be suitable for development, there should be a greater emphasis on managing and improving urban fringe areas rather than raising the prospects of development. Moving the policy to the countryside section may also help emphasise this point.

- 4.31 Policy BE.4 promotes proposals to strengthen small rural towns (market towns) and warrants support. Policy BE.5 promotes planning for small scale development in villages to meet local needs and could form the basis for the type of policy which it is suggested is needed in the Countryside and Landscape Management section.
- 4.32 The explanatory text of the Plan refers to regionally significant historic environment features, which include historic towns such as Winchester. It is suggested that a policy is needed to recognise and protect these features, rather than simply listing them in the explanatory text, especially specific features such as named historic towns.

Town Centres

- 4.33 Policy TC.2 identifies a network of strategic town centres, including Winchester, which should be the focus for major retail, cultural, leisure, office, etc development. The focus on directing development to the main centres is to be welcomed and reflects the sequential approach. However, the policy could be taken to imply that all the centres listed must have major retail, office, etc development. The policy should be clarified by stating that *where there is a need for such development* it should be directed to those centres, and not imply that major development must be planned for in every case.

5 Conclusion

- 5.1 Given the scale of the task which SEERA has faced and the extremely tight timescale within which to produce the South East Plan, the result is generally an admirable piece of work. However, the value of seeking comments on growth options without the corresponding District housing distributions and the 'bottom-up' assessment that this would allow is of questionable value. It is, however, possible to make some comments about the scale of growth which should be promoted in the areas affecting this District, albeit on a provisional basis until the full District-level distribution is known.
- 5.2 With regard to South Hampshire, there is a great concern about the ability of the area to accommodate the high levels of growth being promoted by PUSH. These concerns are heightened by the fact that at these high levels much of the growth would be in fringe Districts like Winchester. It is considered that, whilst PUSH may wish to express its aspirations for growth, insufficient work has been done to test the alternative options and a more cautious approach should be taken at this stage in terms of 'offering up' growth. There is a real danger that high growth levels may become established as a requirement but that the assumptions on which they have been based are subsequently found to be unsustainable or unachievable.
- 5.3 For the 'rest of Hampshire' area the implications of the various potential levels of growth are easier to establish and a mid-range level of growth (about 1000 dwellings per annum) appears appropriate. While this would require significant

new allocations or changes of policy, it would allow affordable housing and other local needs to be addressed.

- 5.4 There are various concerns about the detailed wording of policies and omissions in certain areas. Most significantly this relates to the Countryside and Landscape Management section and various changes to the policies and new/moved policies are suggested.

6 OTHER CONSIDERATIONS:

7 CORPORATE STRATEGY (RELEVANCE TO):

- 7.1 The South East Plan is relevant to most of the Council's priorities over the next 3 years (homes & environment, economic prosperity, Green agenda, etc).

8 RESOURCE IMPLICATIONS:

- 8.1 None directly at present.

BACKGROUND DOCUMENTS:

None.

APPENDICES:

Appendix 1 – Table C2, Summary of Spatial Options

Appendix 2 – Recommended comments to SEERA on behalf of Winchester City Council.

APPENDIX 1

SOUTH EAST PLAN
Table C2. Summary of Spatial Options

<u>Area</u>	<u>CONTINUE EXISTING POLICY</u>			<u>SHARPER FOCUS</u>		
	25,500	28,000	32,000	25,500	28,000	32,000
Kent Thames Gateway	2900	2900	2900	2900	2900	2900
Milton Keynes & Aylesbury Vale	3300	3300	3300	3300	3300	3300
East Kent and Ashford	2400	2500	2800	2600	2800	3100
Central Oxfordshire	1300	1500	1700	1400	1600	1900
Gatwick Area	900	1100	1300	1300	1500	1800
London Fringe	1500	1700	2100	2000	2300	2800
South Hampshire	2800	3200	3800	2900	3300	4000
Sussex Coast	2700	3000	3600	2300	2600	3100
Western Corridor & Blackwater Valley	3500	4000	4800	4300	4900	5900
Sub Total	21300	23200	26300	23000	25200	28800
Rest of Berk shire	100	100	100	100	100	100
Rest of Buckinghamshire	200	200	300	200	300	300
Rest of East Sussex	300	400	500	400	400	500
Rest of Hampshire	1200	1400	1600	700	800	1000
Rest of Kent	700	800	1000	200	200	200
Rest of Oxfordshire	700	800	900	300	300	400
Rest of Surrey	200	200	300	200	200	200
Rest of West Sussex	400	400	500	100	100	100
Isle of Wight	400	500	600	400	400	500
Sub Total	4200	4800	5800	2600	2900	3300
GRAND TOTAL	25500	28000	32000	25500	28000	32000

NB Figures are rounded to the nearest 100. Rounded figures may not sum.

APPENDIX 2**SOUTH EAST PLAN****RECOMMENDED COMMENTS TO SEERA
ON BEHALF OF WINCHESTER CITY COUNCIL****General**

1. The City Council **congratulates** SEERA on the production of the Plan within the short timescale given. The Plan, however, contains a large number of policies, many of which do not deal uniquely with spatial issues in the South East or have a strong South East dimension. Some of the policies simply reflect published Government planning guidance and could be applied throughout the country, not just in the South East. A number of the Plan's policies, therefore, add little to existing guidance and could be removed. SEERA should **review the necessity for all of the policies** that the current version of the Plan contains and check that they have a uniquely South East dimension.

Cross-Cutting Policies

2. The City Council **strongly supports policy CC4**, which seeks to tie the release of land for new development to the capacity of the existing infrastructure to accommodate it and to the provision of necessary new infrastructure. This is a particularly important theme which is consistently raised in relation to development pressure in the region.
3. The City Council **supports policies CC7 and H3**, which promote an 'urban focus'. This is considered particularly important in the context of the proposals for South Hampshire, which need to be focussed on the cities of Southampton and Portsmouth.

Economy

4. The City Council objects **to the lack of a policy specifically on the rural economy**, which more closely sets a policy framework within which rural businesses can succeed. The Plan promotes sustainable economic growth, which is in general to be supported, but there is also a need to facilitate rural businesses and provide for their needs, including an available workforce. Policy RE1 promotes this but tends to be very urban-centred, with the last part of the policy relating to support for rural businesses appearing as an afterthought.

Housing/Sub-Regions

5. It is difficult to make meaningful and informed comments on the very general options for growth presented. However, on balance the City Council **supports the 'sharper focus' option**. There would be no point in producing a new Regional Spatial Strategy, which identifies a series of sub-regions, if those sub-regions and the strategies for them do not form the basis of the overall South East Plan's strategy. The 'continuation of existing policy' option would be inappropriate given that the Plan proposes a revised policy approach.

South Hampshire

6. The City Council **objects to policy SH.11** and the other higher growth options for South Hampshire in Table C2 as insufficient work has been undertaken to justify this level of provision or test its impact. In particular, proper 'bottom-up' work is needed to test the overall figure, including environmental assessment of the options for accommodating such growth levels. As it is not possible to justify a specific figure at this stage (either for housing or employment land), the City Council proposes a series of principles which it would expect any strategy for the South Hampshire area to incorporate:
 - Housing growth should be promoted only as a result of economic development/regeneration needs and should be phased so as to ensure that it contributes directly to the achievement of the economic growth targets in the Plan;
 - The strategy should be urban-centred, with economic and housing growth within or immediately adjoining the sub-region's large urban areas, where the greatest needs exist in terms of deprivation and regeneration.
 - Development beyond that within or adjoining the existing urban areas should only be contemplated if the scale of development required to meet the sub-region's needs necessitates large scale alternatives such as Strategic Development Areas or development within transport corridors.
 - The infrastructure needed for any Strategic Development Areas or transport corridors should be established and provided at an early stage and infrastructure needs and the prospects of delivery should form a key component of the work on strategy/site selection process;
 - Further work is needed on various aspects of the potential large-scale development options, including feasibility, environmental impact, sustainability appraisal, infrastructure requirements, etc. This should inform a 'bottom-up' assessment of the options, alongside the 'top-down' strategy-led approach.
7. The City Council **objects to policy SH2**. In view of the lack of testing that has been done, it cannot be assumed either than the overall housing target promoted by PUSH will be appropriate or that SDAs will be the best way to accommodate the final requirement.
8. The City Council **strongly supports policy SH3**, which recognises the need for an implementation agency to deliver the growth proposed in a sustainable way.
9. The City Council **supports policy SH4**, which acknowledges the need to monitor economic growth rates, etc and to phase the development of major development accordingly.
10. The City Council **supports policy SH12** and its emphasis on affordable housing, including the minimum target of 28,500 affordable homes over the Plan period.

'Rest of Hampshire'

11. The City Council **objects to the 'rest of county' figures in Table C2**. The 'rest of Hampshire' figures are considerably higher than any other 'rest of county area figure. The reliability and appropriateness of the requirement is

questioned and SEERA should reconsider the 'rest of' county figures, not necessarily to significantly reduce the Hampshire figure (see below), but to look at whether the very low figures for many other county areas will actually meet the economic and housing needs of those areas in a sustainable way. In particular, the role and value of Green Belts should be reviewed in some areas as they may inhibit sustainable development. Increasing the 'rest of county' figures for some counties may relieve pressure on others or on some of the sub-regions.

12. The City Council **would support a level of growth of up to 1,000 dwellings per annum** for the 'rest of Hampshire' area (the upper end of the 'sharper focus' range). This would cater for local needs, especially for affordable housing, without requiring a scale of development that is incompatible with the area's essentially rural character and function as a rural 'buffer' between South Hampshire and the Western Corridor. The City Council would **like to see this regional buffer role recognised** in the Plan.
13. The City Council would **strongly object to the very high levels proposed under all of the 'existing policy' options** on the basis that this level of growth would be incompatible with a relatively sparsely populated rural area with no large urban areas and major landscape and other constraints to such a scale of development (including 2 existing/proposed National Parks).
14. The City Council **supports policy H4**, which sets an overall regional target of 35-40% for affordable housing. This will require a higher site-by-site target and/or lower site thresholds if it is to be achieved, but the aim of increasing affordable housing provision to this level is to be welcomed.

Transport

15. The City Council **is concerned about policies T.6 (Airports) and T.14 (Rail Freight)**. These proposals could impact significantly on the District and the policies should be amended to refer to the need to take appropriate account of the environmental implications of improvements to the Airport or the Southampton-Midlands rail corridor, including for people living near the flight paths and rail lines concerned.
16. The City Council **supports policy NRM.1**, relating to water resources and river quality. It is, however, concerned about the impact of the scale of development being promoted through the South East Plan on water infrastructure and the water environment. The effect of the proposed scale of development on water resources is an important matter to be considered in establishing the scale and location of development at the regional scale, through the South East Plan.

Countryside & Landscape Management

17. The City Council **objects to the general lack of attention to rural policies and issues**. The South East Plan has an over-emphasis on urban issues and some of the policies in other sections of the Plan would be more sensibly located in the Countryside section.
18. The City Council **objects to policies C1 and C2**, which conflict with Government guidance in giving a higher priority to protection and conservation of the New Forest National Park than to Areas of Outstanding Natural Beauty. PPS7 makes clear that National Parks and AONBs should all have the highest

level of landscape protection. Whilst there is a different emphasis on recreation provision between National Parks and AONBs, the level of protection conferred should be equal in both policies and there may be scope for combining policies C.1 and C.2.

19. The City Council **objects to the reference to 'open countryside' in policy C.3**. The policy should make it clear that Local Development Frameworks will need to distinguish between built-up areas and the countryside (as existing local plans do) and that its aims should apply within 'the defined countryside'. Although its aims are generally appropriate (protection of distinctive qualities, sustainable land management, etc) the term 'open countryside' is difficult to define and is considered inappropriate.
20. The City Council **objects to the failure of this section to include a policy relating to the approach to development in the countryside**. There should be a policy which is clearer about the strategy for development in rural areas. In line with the urban-centred approach of Government policy and the South East Plan, significant development should be directed primarily to the urban areas, but change and development will be needed in the countryside and rural settlements to meet local needs, particularly for affordable housing and sustainable small-scale business development, including within the National Park and AONBs.

Built & Historic Environment

21. The City Council **objects to policy BE.3 (iii)**, which refers to the need to be proactive in identifying opportunities for sustainable development in urban fringe areas. This is too promotional of development, especially when many urban fringe problems are caused by speculation in and neglect of urban fringe land, resulting from the hope of future development. Whilst some urban fringe areas will be suitable for development, there should be a greater emphasis on managing and improving urban fringe areas rather than raising the prospects of development. Moving the policy to the countryside section would also help emphasise this point.
22. The City Council **supports policy BE.4**, which seeks to strengthen small rural towns (market towns).
23. The City Council **suggests that policy BE.5 could form the basis for the type of policy which it is suggested is needed in the Countryside and Landscape Management section**.
24. The City Council **suggests that a policy is needed to recognise and protect the type of regionally historic environment features** mentioned in the explanatory text of the Plan (Box BE3), which include historic towns such as Winchester, rather than simply listing them in the explanatory text. This applies particularly to specific features such as named historic towns.

Town Centres

25. The City Council is **concerned that policy TC.2 could imply that all the centres listed must have major retail, office, etc development**. The policy should be clarified by stating that *where there is a need for such development* it should be directed to those centres, and not imply that major development must be planned for in every case.