

CABINET

21 June 2006

SOUTH EAST PLAN: CONSULTATION ON 'SUBMISSION' VERSION

REPORT OF CHIEF EXECUTIVE

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RECENT REFERENCES:

CAB1104 - South East Plan Update, Cabinet 29 June 2005
CAB1047 - Consultation on South East Plan, Cabinet 23 March 2005, Council 13 April 2005
CAB1096 - South East Plan: District Housing Distribution, Cabinet 26 July 2005.
CAB 1135 – South East Plan: “Where Shall We Live” Consultation, Cabinet 12 Oct 2005

EXECUTIVE SUMMARY:

The draft South East Plan was published in January 2005 for a first stage of public consultation, relating to the overall strategy and housing provision. A second stage of public consultation, including District-level housing requirements was undertaken by Hampshire County Council and the Partnership for Urban South Hampshire (PUSH) in Autumn 2005.

Following this two-stage consultation process, the South East England Regional Assembly (SEERA) has agreed the Plan and submitted it to Government in March 2006. The 'submission' version of the Plan is currently published for formal consultation, with responses to be submitted by 23 June 2006.

Following this stage of consultation, there will be an 'Examination in Public' (EIP), at which an independent Panel, appointed by the Secretary of State, will examine the Plan. The EIP Panel will submit its report to Government, with the Government expected to finally adopt the Plan in early 2008.

This is the last opportunity for the Council to comment before the independent examination of the Plan. Comments at this stage are directed to the EIP Panel, who will ultimately report to Government on whether the Plan should be adopted and how it should be changed.

Appendix 1 to this report sets out the comments which it is recommended the City Council makes on the submitted South East Plan. Account has been taken in formulating these of the comments that the City Council has made at earlier stages, and discussions with groupings of other authorities such as PUSH and the Central Hampshire and New Forest Authorities. The recommended response is generally supportive of the Plan's principles, but it is recommended that objections be made in relation to various issues, the key ones being summarised at paragraph 5.1 of the report.

RECOMMENDATIONS:

That the recommended comments set out at Appendix 1 of this report be endorsed and submitted to the Examination in Public Panel as representing the City Council's response to the submitted South East Plan (March 2006).

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DETAIL:

1 Background

- 1.1 The draft South East Plan was published by the South East England Regional Assembly (SEERA) for consultation in January 2005. That publication was the start of the 'Part 1' consultation on the general policies and strategy of the South East Plan. Following the 'Part 1' consultation on the overall development strategy and general housing requirements, SEERA decided on the housing requirements for each sub-region and remaining 'rest of County' areas in July 2005 and Part 1 of the Plan was finalised and formally submitted to Government at that time.
- 1.2 SEERA then 'commissioned' the 'principal authorities' (in Hampshire these are Hampshire County Council and Southampton and Portsmouth City Councils) to produce and consult on the District-level distribution of housing requirements, in consultation with Districts. Consultation on District-level housing provision was undertaken, starting in September 2005, through the "Where Shall We Live" publication produced by Hampshire County Council.
- 1.3 The comments made on the District-level housing provision were considered by the principal authorities and they submitted their advice on District housing distribution to SEERA in December 2005. This included joint submissions by the Partnership for Urban South Hampshire (PUSH) and by Hampshire County Council on behalf of the Central Hampshire Authorities.
- 1.4 Having considered all the advice submitted, SEERA finalised the South East Plan for submission in March 2006. It is this submitted version of the Plan which is now the subject of consultation, this being the last opportunity for formal comment before the Examination in Public into the Plan.

2 Future Stages

- 2.1 Following the current stage of consultation, there will be an 'Examination in Public', at which an independent Panel, appointed by the Secretary of State, will examine the Plan. The Examination in Public (EIP) will start in November 2006 and is expected to run until March 2007. It will visit various locations within the region and examine the full range of policies, from those on particular topics to the sub-regional strategies.
- 2.2 The EIP Panel will submit its report to Government in summer 2007, with the Government expecting to publish Proposed Modifications in the light of the EIP Panel Report for consultation in autumn 2007. The South East Plan is expected to be finally adopted in early 2008. At this stage, the South East Plan will supersede Regional Planning Guidance note 9 (RPG9) as the regional planning guidance for the South East and will become part of the 'development plan' for Winchester District.

3 Content of the South East Plan

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

- Core Document
- Sustainability Appraisal, Non-Technical Summary
- Implementation Plan
- Monitoring Framework
- Pre-Submission Consultation Statement
- Executive Summary

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

3.2 The Core Strategy is divided into 5 sections. There are sections (A & B) on 'Challenges' and 'Context' and section (C) on 'Strategy Options and Sustainability'. These are relatively brief and 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 and the Isle of Wight Special Policy Area.

3.3 Section C (Strategy Options and Sustainability) introduces a 'vision' (not in the previous consultation version) of 'The Healthy Region', where the aim is to show sustained improvement in quality of life over the period of the Plan. The core strategy set out in the earlier draft Plan is replaced by a 'Statement of Policy' (section 2.2), which is similar but specific references to planning for 3% per annum economic growth (GVA) are deleted and reference is added to the need for land and resource management by public bodies. Section C also sets out the strategic options which were consulted on and describes the preferred spatial strategy, including a summary of the sub-regional strategies. The housing allocations, broken down into sub-regions and 'rest of county' areas, are set out in Table C3, which proposes a total housing provision for the region averaging 28,904 dwellings per annum over the Plan period (2006-2026). This is at about the middle of the range consulted on originally, of 25,500 – 32,000 per annum.

3.4 Section D of the Plan sets out the Plan's general policies on various topic areas:- Cross-Cutting, Economy, Housing, Communications & Transport, Sustainable Natural Resource Management, Waste and Minerals, Countryside and Landscape Management, Management of the Built & Historic Environment, Town Centres, Tourism and Related Sports and Recreation, Social Cultural and Health Dimensions. There are over 100 policies in this Section in total, although 29 of these relate to minerals and waste or tourism and are based on recent regional guidance with only minor changes. 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.

3.5 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 is based on the advice submitted by PUSH, which includes an economic-led strategy and housing provision of 80,000 dwellings over 20 years.

4 Commentary and Recommended Response

- 4.1 This section comments on the South East Plan's policies and sub-regional strategies 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. Reference is made to comments that the City Council has made on earlier versions of the Plan, and the degree to which these are reflected in the submitted document.

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.
- 4.3 However, the Plan is, if anything, rather 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. This concern is picked up, as appropriate, in the recommended comments below.

Cross-Cutting Policies

- 4.4 There was a general concern that the policies of the original draft Plan were not sufficiently South-East specific, although there has been an improvement in this respect, with several policies now having clearer requirements. The climate change policy (CC2) has been considerably expanded and a new policy has been introduced on sustainable construction (CC4). It is, however, disappointing that policy CC4 moves away from requiring specific standards (the previous Policy CC3 sought BREEAM 'Very Good' standards in new commercial development). This is in contrast to the South Hampshire sub-regional policy on environmental sustainability (SH14), which requires new commercial and residential buildings to achieve BREEAM 'Very Good' standard initially, and 'Excellent' after 2012. It is, therefore, recommended that the City Council objects to the weakness of Policy CC4.
- 4.5 The City Council previously supported policy CC4 (now CC5), which sought 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 policy has been further amplified and is clearer that development should not proceed until the necessary infrastructure is available

or will be provided and that development should help provide it. Therefore the Council should continue to support this policy.

- 4.6 The Council previously supported Policy CC7 (now CC8a), which promotes an 'urban focus'. This remains particularly important, especially in the context of the proposals for South Hampshire. This approach is also reflected in housing Policy H3 and it is recommended that together these policies should be supported.
- 4.7 The previous Policy CC8 proposed a series of sub-regions, where the emphasis tends to be on growth, regeneration and economic opportunity. This policy has been deleted, as the sub-regions have their own sections within the Plan. New policies have been introduced identifying 'regional hubs' and promoting growth in the Maidstone and Tonbridge area of Kent, which are the only regional hubs outside the 9 sub-regions (policies CC8b and CC8c). These policies do not directly affect the City Council.
- 4.8 A new policy has been introduced setting criteria for designating strategic gaps between larger settlements (Policy CC10b). This Policy is unlikely to be of direct relevance to this District as it relates to gaps between settlements of more than 10,000 population. New policies have also been introduced promoting measures to address the aging population and encouraging conservation of local character and distinctiveness (policies CC11 and CC12). Although these policies are generally to be welcomed, they add little to existing national planning advice.

Economy

- 4.9 The Plan promotes sustainable economic growth and, in particular, the promotion of regionally important sectors and clusters. New policies have been added on information communications technology (ICT - Policy RE4) and guidance on the approaches to be taken in different sub-regions (Policy RE5). One of the City Council's earlier objections, reflecting the views of business representatives, was to the lack of a policy specifically on the rural economy. There is still no policy on the rural economy and it is, therefore recommended that the City Council reiterates its previous objections.

Housing

- 4.10 The Plan now includes a District-level distribution of housing requirements, following consultation on this in autumn 2005 (policy H1). This sets a total requirement of 10,439 dwellings for Winchester District over the 20 years of the Plan, or 522 annually. This excludes any provision in the South Hampshire 'Strategic Development Areas' (SDAs), some of which may impinge on Winchester District. The housing requirements for the SDAs are listed separately and are 10,000 dwellings for the Fareham SDA and 6,000 dwellings for the North East/North of Hedge End SDA.
- 4.11 The housing requirements for the District include 2 areas which contain parts of Winchester District: the South Hampshire Sub-Regional Strategy (PUSH) area and the 'rest of Hampshire' (Central Hampshire) area. The requirement for the part of the District in the PUSH area is 6,739 dwellings, so by deducting this from the District total (10,439) the requirement for the remainder of the District can be calculated as 3,700. It is recommended that the City Council objects to the way that the housing requirement is expressed, as it fails to set out clearly

that the District requirement is in two parts. Not only does this make it more difficult to work out the requirement for the Central Hampshire part of the District, it could lead to pressure in the future to make good any shortfall in one part of the District within the 'wrong' area (e.g. any shortfall in PUSH being made good in Central Hampshire).

South Hampshire

- 4.12 The detail of the strategy for South Hampshire is set out in the relevant sub-regional strategy, and discussed later in this report. However, in terms of overall housing provision proposed, the requirement is 6,739 dwellings, which is significantly lower than any of the options consulted on during the 'Where Shall We Live' consultation. The precise implications of accommodating this scale of development will need to be assessed when future housing capacity studies are undertaken, but it is expected that development could be accommodated through a mixture of existing commitments, large urban extensions and urban capacity.
- 4.13 The details of how such provision could be made will need to be developed and tested through the production of future aspects of the Local Development Framework, but it the PUSH requirement incorporates the following general assumptions about provision:
- Existing sites and urban capacity – about 2,739 including the 'baseline part of West of Waterlooville (1,400 - the remaining 600 of the West of Waterlooville baseline provision is in Havant Borough);
 - Major urban extensions – about 4,000, made up of the 'reserve' provision at West of Waterlooville (about 1,000) and a northern extension of Whiteley (up to 3,000).
- 4.14 The only 'new' provision within Winchester District may, therefore, be the large urban extensions at West of Waterlooville (already planned as a reserve provision) and Whiteley North. Whether this proves to be the case will depend to a large extent on future estimates of urban capacity and windfall development, which will need to be updated as part of the LDF process.
- 4.15 The West of Waterlooville 'reserve' provision is already planned for and has been supported by the Local Plan Inspector. The earlier options for housing provision which would have assumed further major expansion beyond the existing reserve provision have been dropped. Accordingly, it is concluded that there is scope to accommodate about 1,000 dwellings within the existing reserve area.
- 4.16 The original Whiteley Local Plan referred to the scope for further development to the north of the settlement and this would help to make the existing town centre more central to the development. It would also be an opportunity to complete Whiteley Way and to provide some of the facilities which are not currently provided, such as further school(s). Development to the north east of Whiteley is constrained by woodland Sites of Special Scientific Interest. Although there are some Sites of Importance for Nature Conservation in the area to the north, these are not so extensive as to prevent development of the scale envisaged. The area generally between the B3051 and the Eastleigh-Fareham railway line would, therefore, seem capable of accommodating up to 3,000 dwellings.

- 4.17 Accordingly, it is proposed that the City Council should support the level of housing provision allocated for the part of the District within the PUSH area, while resisting any increase in this level of provision. There are, however, concerns about the detailed phasing of provision, as set out in the South Hampshire sub-regional strategy, and these are considered later in this report.

'Rest of Hampshire'

- 4.18 The proposed level of housing provision for the part of the District outside the PUSH area is 3,700 dwellings over the Plan period (185 dwellings per annum). This forms part of the total housing requirement of 16,000 dwellings for the whole 'rest of Hampshire' area (800 dwellings per annum). In commenting on the earlier consultations on housing provision, the City Council objected to some of the higher options for dwelling provision (up to 32,000 dwellings under one option) and recommended a level of up to 1,000 dwellings per annum over the whole 'rest of Hampshire' area (20,000 dwellings total).
- 4.19 The local authorities within the 'rest of Hampshire area' (known as Central Hampshire and New Forest) have liaised to formulate a joint response on the South East Plan. Although the authorities had previously promoted an annual figure of 1,000 dwellings, they have recently agreed to accept the South East Plan's requirement of 800 dwellings per annum. It is estimated that in Winchester District this level of housing could be developed on committed sites and through urban capacity. It could, therefore, be equated to carrying forward existing policies, with generally tight settlement boundaries and development within existing built-up areas. Under this option there would be no significant need or opportunity to develop greenfield sites over the next 20 years, assuming the estimates of urban capacity prove to be realistic. This approach may be welcomed by many, but would be of concern to others in view of the affordable housing problems which are already experienced.
- 4.20 Given the generally very rural nature of the Central Hampshire & New Forest area, any significant increases in the requirement would soon start to require fairly major development options. For example, increasing the requirement to 1,000 dwellings per annum could either require the release of all the existing reserve provision from the County Structure Plan including Winchester City North MDA, or some other significant alternatives.
- 4.21 It is therefore recommended that the City Council promotes a level of housing provision that will meet local needs, but with development limited to ensure the area retains its role and character as a rural 'buffer' between the sub-regional growth areas of South Hampshire and the Western Corridor/Blackwater Valley. The Plan has not taken up the City Council's earlier suggestion that Central Hampshire be recognised as a regionally-important gap between the growth areas of South Hampshire and the Western Corridor. It is recommended that objection be raised to the failure of the Plan to identify this area as such.
- 4.22 It is, therefore, recommended that the City Council should support a level of 800 dwellings per annum across the Central Hampshire area as a whole, including the requirement for Winchester District of 185 per annum (3,700 total). Accordingly, it is recommended that the City Council supports the level of housing allocated to the Central Hampshire part of the District by the South East Plan, whilst signing up to a level 800 dwellings per annum for the Central Hampshire area in total.

- 4.23 The City Council supported the earlier draft South East Plan's policy H.4, which set an overall regional target of 35-40% for affordable housing (25% for social rented accommodation and 10-15% for other forms of affordable housing). It also required local authorities to set a site size threshold at which the policy would apply. The current draft of the Plan proposes a slightly lower requirement of 25% social rented and 10% other forms and refers to the need for local development documents to provide guidance on financial viability and the role of public subsidy. To achieve the proportions of affordable housing referred to in the policy for all housing would require a higher site-by-site target as only larger sites contribute affordable housing. In view of the affordable housing needs of Winchester District and the importance of having supportive regional policies to help meet them, it is recommended that the City Council objects to the reduced requirements in revised Policy H.4, both in terms of the reduction in the proportion of affordable housing required and the removal of reference to the site size threshold being established locally.
- 4.24 Policy H.5 continues to promote a target density of 40 dwellings per hectare for the region as a whole. The policy seeks to have this target incorporated into local development documents, but makes provision for appropriate local variations. 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 areas such as smaller towns and villages. Therefore, as a region-wide target this seems appropriate and the caveats in the policy allow sufficient flexibility for the City Council to respond to local circumstances. It is not, therefore recommended that the Council need comment on this policy.
- 4.25 A new section is included on provision for gypsies and travellers. This highlights the requirement of the Housing Act 2004 and Circular 01/2006, including the requirement for local authorities to carry out gypsy and traveller accommodation assessments. The Plan notes that these are not sufficiently complete to enable the inclusion at this stage of a policy containing requirements in the form of the number of pitches required for each local planning authority area. This is the intention however, and an early partial review of the Plan is promised to achieve this. It is also notable that Table H1 of the Plan indicates that Hampshire has the second highest number of unauthorised pitches (136 caravans), after Kent.

Transport

- 4.26 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 number of policies has been reduced from earlier drafts, mainly by merging existing policies. The only policies which are considered to be of potential concern are T.9 (Airports) and T.12 (Rail Freight) and the City Council expressed its concern about the equivalent policies at earlier consultation stages.
- 4.27 Policy T.9 encourages Southampton Airport to 'sustain and enhance its role as an airport of regional significance'. Whilst the importance of the Airport is fully recognised, there are concerns in this District about the disturbance caused by existing flight paths. Therefore, it is recommended that objection be raised to this policy with a view to seeking the inclusion of a reference in the Plan to the need for adequate account to be taken of the environmental impact of any

airport expansion. Policy T.12 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 and the Portsmouth to Southampton/West Midlands corridor. 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 objection be raised to the failure of the Plan to mention the need to take account of the environmental implications of improvements to these corridors, including for people living near the lines concerned.

Sustainable Natural Resource Management

- 4.28 This section sets out a range of policies on natural resources, including water resources, biodiversity and energy efficiency. The policies are generally to be welcomed. Policy NRM.1, relating to water resources and river quality, is of particular note and includes a new requirement to achieve BREEAM 'Very Good' standards and increasingly to achieve 'Excellent'. The policy requires account to be taken of water quality and capacity, 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. This is particularly pertinent in view of current concerns about water shortages. The City Council raised this issue in its previous comments to SEERA, but it is not recommended that this point be repeated at this stage as there are more competent bodies in this field, such as the Environment Agency, which can be expected to object where this can be substantiated.

Waste and Minerals

- 4.29 This is a new chapter of the Plan which brings together policies previously contained in other parts. Regional planning policies on minerals and waste were already being developed and have been through an Examination in Public. The Plan incorporates these policies and highlights a few areas where they have changed. The most significant of these relates to the provision to be made for dealing with waste exported from London (Policy W3).
- 4.30 The Plan states that provision should be made for a declining amount of waste from London and that after 2016 only residues from recycled or other processed waste should be accommodated. The provision for each County is set out, with Hampshire expected to accommodate 8.4% of the waste exported from London to the Plan area. This is the equal lowest proportion of all Counties in the Plan area and amounts to 2.2 million tonnes over the Plan period. As Hampshire County Council is the minerals and waste planning authority, it is not considered that the City Council has sufficient technical knowledge of this issue to make an informed comment. Although the amounts of waste seem large, the intention to reduce provision and increase recycling are welcome.
- 4.31 A largely new policy (M2) sets targets for increasing recycled and secondary aggregates provision, by County, so as to reduce the need for primary aggregates extraction. Hampshire's target of 1.7 million tonnes per annum by 2016 is the highest in the Plan area. Once again, it is difficult for the City Council to comment on this specialist area, although it seems that the high target for secondary aggregates would be beneficial if it reduces the need for primary extraction. Hampshire County Council is progressing its own Minerals and Waste Local Development Framework which will deal with these issues.

Countryside & Landscape Management

- 4.32 This very short section contains only 4 policies, on the New Forest National Park and proposed South Downs National Park, Areas of Outstanding Natural Beauty (AONBs), countryside management, and access/rights of way. Although policies in the other 'topic' sections relate to the countryside, the general lack of attention to rural policies and issues was an area of concern at the previous stage and the City Council objected to this. The City Council also objected to former policies C1 and C2, which gave a higher priority to protection and conservation of the New Forest National Park than to Areas of Outstanding Natural Beauty. This was felt to be in conflict with Government advice and the City Council suggested there may be scope for combining these policies.
- 4.33 Policy C.1 has been split into two parts (C1a and C1b), the first dealing with the New Forest National Park and the second with the proposed South Downs National Park. The Central Hampshire and New Forest grouping of authorities have agreed a joint submission suggesting additional wording for C1b to give policy guidance on development if and when the South Downs National Park is designated. This is lacking from policy C1b as drafted. While signing up to this suggestion, it is recommended that the City Council questions the value of having a policy at all when this relates to an as yet undesignated area and largely repeats existing government advice, and suggests this should instead be confined to the explanatory text.
- 4.34 The City Council's previous concern about a higher priority being given the national parks than AONBs has not been entirely overcome, despite a slight wording change, and it is recommended that objection continues to be raised to this aspect of Policy C1a.
- 4.35 The City Council previously objected to the failure of the Plan to include any policy in this section relating generally to development in the countryside. It was considered that there should be a policy which is clear about the strategy for development in rural areas, as change and development will be needed in the countryside and rural settlements to meet local needs, particularly for affordable housing. However, such a policy remains absent and it is recommended that the City Council again objects to this omission.

Built & Historic Environment

- 4.36 Policies BE1 – BE2 of the earlier draft Plan have been substantially rewritten and are now covered by 3 policies (BE1 – BE3). In general these relate to the management of change within urban and suburban areas. The general aim of the policies is to help manage change in various types of urban/suburban areas.
- 4.37 While this is generally welcome, the wording of Policy BE2 in particular (and BE3 to some extent) implies that local authorities must produce planning documents dealing with intensification and renewal in suburban areas. Given the number of suburban areas in the City Council's area (and probably most authorities' areas) this could be very onerous. The City Council is producing Supplementary Planning Documents to guide change in those suburban areas which are subject to particular pressures, through the production of Local Area Design Statements. However, it is unlikely that the Council would wish, or be able, to extend this approach to all suburban areas. It is therefore,

recommended that the City Council objects to Policy BE2 and suggests that it should be changed to enable such guidance to be produced, but not to require it.

- 4.38 The City Council objected to the former Policy BE3 (now BE4) dealing with the urban/rural fringe. It was concerned that the policy suggested local authorities should be proactive in identifying opportunities for development in urban fringe areas, including urban extensions. This was considered 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. Although the policy has been reworded it is, if anything, of more concern than before. The previous reference to urban extensions was qualified by 'where appropriate', but this no longer appears. Also, the policy now implies that all urban fringe areas need to be defined in local development documents and these could, as a result, be vulnerable to urban extensions. It is therefore recommended that the City Council maintains its objections to Policy BE4, and indeed questions whether this needs to be a policy at all.
- 4.39 The City Council previously supported policies BE4 and BE5 (now BE5 and BE6), promoting proposals to strengthen small rural towns (market towns) and planning for small scale development in villages to meet local needs. It suggested BE5 could form the basis for the type of policy which it suggested was needed in the Countryside and Landscape Management section, although has not happened. Nevertheless, it is recommended that the Council reiterates its support for these policies.
- 4.40 The explanatory text of the Plan refers to regionally significant historic environment features, which include historic towns such as Winchester. The City Council previously 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. This suggestion was not taken up and it is recommended that the Council objects to the failure of Policy BE7 to list key historic towns, such as Winchester, which are clearly of regional heritage importance.

Town Centres

- 4.41 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. Winchester is defined as a 'secondary regional centre', along with centres such as Eastleigh, Fareham and Aldershot. Centres such as Southampton, Portsmouth and Basingstoke are identified as 'primary regional centres' (these are the only centres in Hampshire to be defined as 'primary'). The focus on directing development to the main centres reflects the sequential approach. However, the City Council expressed concern at the earlier consultation stage that the policy could be taken to imply that all the centres listed must have major retail, office, etc development and suggested the policy should only apply where there is a need for such development.
- 4.42 Policy TC3 has been revised from the version in the earlier draft Plan and now indicates that town centres should meet identified needs, taking account of various factors including historic character. It is considered that this overcomes the City Council's earlier concerns about the interpretation of TC2 and that this concern need not be reiterated. The classification of Winchester as a 'secondary' regional centre rather than a primary one is perhaps of concern for

the status of the town. It seems logical to classify Winchester as a lower order of centre than Southampton, Portsmouth, Reading and Oxford, but on the other hand, smaller historic centres such as Canterbury and Guildford are also classed as 'primary'. However, on balance, it is not recommended that this is an issue about which objection should be raised.

Tourism and Related Sports and Recreation

- 4.43 This is a new Chapter of the Plan, tourism having previously been included within the economy and tourism chapter. It rolls forward policies from the recently-approved Regional Spatial Strategy for Tourism and Related Sport and Recreation. Only minor amendments to the approved strategy are proposed, to replace references to the earlier 'Priority Areas for Economic Regeneration' with references to the sub-regional strategies. It is not recommended that the City Council makes any comments on this section.

Social, Cultural and Health Dimensions

- 4.44 This Chapter includes policies on the provision of a range of physical and social infrastructure. The policies are considered appropriate and the City Council made no comment on them previously. Although many policies have been re-written they do not raise issues which it recommended the Council needs to comment on.

South Hampshire Sub-Region

- 4.45 Part E of the Plan contains sections on each of the 9 sub-regional strategies and the Isle of Wight Special Policy Area. The only one of these which directly affects Winchester District is the South Hampshire Sub-region (Section E1). The detail of this Section is as recommended by PUSH and the overall strategy is of economically-led growth and regeneration.
- 4.46 Policy SH2 promotes the development of two 'Strategic Development Areas', one to the north of Fareham (up to 10,000 dwellings) and one to the north and north-east of Hedge End (up to 6,000 dwellings). Policy SH2 now names the SDA locations, following the consultation on housing provision, and includes a requirement to maintain gaps between the Fareham SDA and Wickham./Funtley/Knowle, and the Hedge End SDA and neighbouring settlements. The policy requires the precise location and boundaries of the SDAs to be defined in Local Development Documents and the housing requirements of the SDAs are identified separately in Policy H1 rather than being allocated to a specific District.
- 4.47 In commenting on the earlier housing provision consultation, the City Council concluded that, in the absence of a strategic environmental assessment, it was difficult to judge whether either SDA would be more sustainable than extensions to other larger settlements in South Hampshire. The City Council had substantial concerns, mainly concerning landscape impact, transport and potential coalescence of settlements, and suggested a more appropriate solution may be to develop smaller SDAs with the shortfall made up from smaller scale urban extensions.
- 4.48 The size of the Eastleigh SDA has been reduced to 6,000 dwellings, while the Fareham SDA remains at 10,000. Some technical work has been undertaken on the SDAs, mainly in relation to Hedge End. This has indicated that there

are significant issues which will need to be addressed, relating to the precise location of development, traffic and transport, water supply and waste water treatment, and other infrastructure provision. In relation to the Fareham SDA, the concerns about landscape and traffic impact remain. It is, therefore, recommended that the City Council raises objection to both of the SDAs on the basis that:

- It is not possible to say whether the SDAs would be preferable to smaller urban extensions in the absence of strategic environmental assessment of the options;
- Work on the Hedge End SDA has indicated potential problems in relation to traffic and transport, water supply and sewage disposal, and other infrastructure provision and it has not yet been demonstrated that these can be satisfactorily addressed;
- Insufficient work has been undertaken on the Fareham SDA to overcome the City Council's concerns about the landscape impact and traffic implications of this proposal.

4.49 It is, however recommended that the City Council supports the inclusion within Policy SH2 of the references to retaining gaps with Wickham, Knowle and the settlements neighbouring Hedge End. It is also notable that a new policy SH3 has been added designating strategic gaps between various settlements. As in the Structure Plan, the only one affecting Winchester District is the 'Meon Gap' between Fareham and Whiteley. The explanatory text identifies other gaps which it suggests may warrant designation as local gaps, none of which are in Winchester District. Given the importance of the Denmead/Waterlooville Gap, it is recommended that objection should be raised to the exclusion of this gap, even though the Plan would not exclude its continued designation.

4.50 A number of other policies for the South Hampshire sub-region have been amended or expanded, as recommended by PUSH. Of most concern is the new Policy SH12 dealing with the detailed allocation and phasing of housing provision. As noted above, the overall housing requirement for the South Hampshire part of Winchester District (6,739 dwellings) is considered acceptable, but Policy SH12 breaks this down into the 5-year periods that make up the total 20-year Plan period. For the South Hampshire part of Winchester District, this requires:

Period	Dwellings
2006-11	1,400
2011-16	3,800
2016-21	1,044
<u>2021-26</u>	<u>495</u>
Total 2006-26	6,739

4.51 It can be seen that the provision is heavily weighted towards the first half of the Plan period, especially the 5 years from 2011 to 2016. This is because it has been assumed that the large urban extensions (West of Waterlooville 'reserve' and Whiteley North) will take place in this period, along with the remaining part of the West of Waterlooville 'baseline' which was originally due to be developed by 2011. However, whilst this reflects the strategy for South Hampshire of using urban extensions in the period prior to the SDAs coming on-stream, it gives a very high housing requirement within one 5-year period. This would require annual completions of 760 dwellings per annum over this period, a level which has rarely ever been achieved for the whole District. In the 5-year

periods before and after 2011-16 the annual rate would need to be only 210-280 dwellings per annual, and only 100 per annum in the final 5-year period. The conclusion is that, in practice, a more even profile would be more appropriate, especially given the difficulty of building and marketing this level of development within a relatively small area.

- 4.52 It is, therefore, recommended that the City Council object to the inclusion of Policy SH12 and suggests that the table of phasing be confined to the explanatory text of the Plan, and therefore be a guide, rather than having the status of a policy in its own right. In addition, it is recommended that the Council suggests an alternative and more realistic phasing of the development requirement for the District, as follows:

Period	Dwellings
2006-12	1750
2011-16	2600
2016-21	1800
<u>2021-26</u>	<u>589</u>
Total 2006-26	6,739

It will be noted that the overall total remains at 6,739, as it is not the intention to challenge the overall requirement, merely to achieve a more realistic phasing. Failure to do this could lead to pressure to make good any 'shortfalls' that may arise in a particular period, simply because a major site has been delayed, even though it would still be developed in the Plan period.

- 4.53 Another new policy in this section is SH14, dealing with environmental sustainability. This seeks to ensure that high standards of sustainability are incorporated into new development in the sub-region, including a requirement that new commercial and residential buildings built before 2012 achieve an Ecohomes/BREEAM rating of 'Very Good', rising to 'Excellent' after 2012. The policy also has targets for renewable energy production and a decrease in water use in new development. It is recommended that policy SH14 be supported and promoted as a more suitable policy for the region as a whole than the existing policy CC4 (see section on cross cutting policies above).

5 Conclusion

- 5.1 The majority of the policies in the South East Plan are considered to be acceptable and suitable for inclusion in a Regional Spatial Strategy. There are, however, a number of areas where specific policies may adversely affect this District, or have particular benefits, and where specific comments of objection or support should be made. A full list of recommended response is set out at Appendix 1, with some of the key points being:

- Concern about the weakness of policy C4 in relation to sustainable development, especially compared to the much better policy promoted for South Hampshire (SH14);
- Objection to the lack of policies relating to rural areas, especially the lack of a policy setting out the basis for development in rural areas;
- Support for the housing requirements for the District, although these should not be increased;
- Objection to the inclusion of detailed phasing requirements within the suite of policies for South Hampshire, especially without addressing the

excessive requirement that this would produce in a particular 5-year period of the Plan;

- Objection to the identification of the proposed SDAs in South Hampshire due to their potential impacts and the failure to resolve these or compare them with alternative options.

5.2 It is recommended that the draft comments set out in Appendix 1 be approved and that officers submit them before the close of the comment period on 23 June.

6 OTHER CONSIDERATIONS:

6.1 CORPORATE STRATEGY (RELEVANCE TO):

The Council's key priorities for 2006-09 include to 'provide housing, in particular affordable housing, to meet the needs of the whole community'.

6.2 RESOURCE IMPLICATIONS:

The City Council will need to amplify its representations in advance of the Examination in Public and may have the opportunity to participate in the Public Examination of the South East Plan. This can be accommodated by existing staff and within planned workloads. The proposed levels of development arising from the South East Plan will in due course need to inform the Council's Local Development Framework, for which appropriate resource provision needs to be made.

6.3 BACKGROUND DOCUMENTS:

6.4 None.

6.5 APPENDICES:

1. List of representations which it is recommended the City Council makes on the submitted South East Plan.

SUBMITTED SOUTH EAST PLAN

RECOMMENDED COMMENTS ON BEHALF OF WINCHESTER CITY COUNCIL

Cross-Cutting Policies

1. The City Council **objects to policy CC4**, which it considers to be too weak to achieve the aim of sustainable construction. This is in contrast to the South Hampshire sub-regional policy on environmental sustainability (SH14), which requires new commercial and residential buildings to achieve BREEAM 'Very Good' standard initially, and 'Excellent' after 2012 and the Council recommends that an equivalent policy to SH14 be applied to the whole Plan area.
2. The City Council **supports policy CC5**, which is clearer than the earlier policy CC4 that development should not proceed until the necessary infrastructure is available or will be provided and that development should help provide it. This is a key principle and needs practical and financial support from Government and other agencies now that the Plan period has commenced and housing growth is starting to be delivered.
3. The Council **supports Policy CC8a**, which promotes an 'urban focus'. This remains particularly important, especially in the context of the proposals for South Hampshire. This approach is also reflected in housing **Policy H3, which the Council also supports**.

Economy

4. The City Council **objects to the lack of a policy specifically on the rural economy**, which would set a policy framework within which rural businesses, including agriculture itself, 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. The last part of Policy RE2, relating to support for rural businesses, fails to set a policy framework and appears to be an afterthought.

Housing

5. The City Council **objects to the way that the District housing requirement is expressed in Policy H1**, as it fails to set out clearly that the District requirement is in two parts (part in south Hampshire and part in the 'rest of Hampshire'). Not only does this make it more difficult to work out the requirement for the 'rest of Hampshire' part of the District, it could lead to pressure in the future to make good any shortfall in one part of the District within the 'wrong' area (e.g. any shortfall in PUSH being made good in Central Hampshire). Given the different policy status given to the sub-regions compared to the 'rest of County' areas, this would be totally inappropriate.

South Hampshire

6. The City Council **supports the level of housing provision allocated by Policy H1** for the part of the District within the PUSH area, although it would resist any increase in this level of provision. There are, however, concerns about the detailed phasing of provision, as set out in the South Hampshire sub-regional strategy, and these are the subject of an objection to Policy SH12 (below).

'Rest of Hampshire'

7. The City Council **supports the level of housing allocated by Policy H1** to the 'rest of Hampshire' part of the District by the South East Plan. It also supports the overall requirement for the 'rest of Hampshire' area of 800 dwellings per annum in total. However, given the generally very rural nature of the 'rest of Hampshire' area, any significant increases in the requirement would soon start to require major development options, which would not be appropriate and would be opposed by the City Council.
8. The City Council **objects to the failure of the Plan to recognise the important role of the 'rest of Hampshire' area as a regionally-important gap** between the growth areas of South Hampshire and the Western Corridor. The Plan should identify this area as such.
9. The City Council **objects to the reduced affordable housing requirements in revised Policy H.4**. The reduction in the proportion of affordable housing required and the removal of reference to the site size threshold being established locally will weaken the policy. The affordable housing needs of Winchester District are substantial and it is important that there are strong and supportive regional policies to help meet them.

Transport

10. The City Council **objects to policies T.9 (Airports) and T.12 (Rail Freight)**. Whilst the importance and value of Southampton Airport is acknowledged, these proposals could impact significantly on the District. Therefore, the policies should be amended to refer to the need to take appropriate account of the environmental implications of improvements to Southampton Airport or the Southampton-Midlands rail corridor, including for people living near the flight paths and rail lines concerned.

Countryside & Landscape Management

11. The City Council **objects to Policy C1a** which conflicts with Government guidance by 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 C1a and C2.
12. The City Council **objects to Policy C1b** as this relates to an as yet undesignated area and merely repeats government advice on National Parks. The Council suggests that this statement should instead be confined to the

explanatory text. In any event, the City Council supports the joint submission by the Central Hampshire and New Forest grouping of authorities suggesting additional wording for C1b to give policy guidance on development if and when the South Downs National Park is designated. This is lacking from policy C1b as drafted.

13. 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 clear 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

14. The City Council **objects to the wording of Policy BE2 in particular (and BE3 to some extent)** which implies that local authorities must produce planning documents dealing with intensification and renewal in suburban areas. Given the number of suburban areas in the City Council's area (and probably most authorities' areas) this could be unduly onerous. The City Council is producing Supplementary Planning Documents to guide change in those suburban areas which are subject to particular pressures, but it is unlikely that the Council would wish, or be able, to extend this approach to all suburban areas. Therefore, Policy BE2 should be changed to enable such guidance to be produced, but not to require it.
15. The City Council **objects to policy BE4**, which refers to the need to be proactive in identifying opportunities for sustainable development in urban fringe areas and requires that local development documents define urban fringe areas. The wording of the policy is too promotional of development, especially as the earlier Plan's inclusion of the words 'where appropriate' has been deleted. Many urban fringe problems are caused by speculation in and neglect of urban fringe land, resulting from the hope of future development, and this policy wording is likely to exacerbate the problem. 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. There should be no requirement to identify urban fringe areas unless the LDD concerned is proposing a different planning policy for them or specific measures.
16. The City Council **supports policies BE5 and BE6**, which seeks to strengthen small rural towns (market towns) and provide for appropriate development in villages. It would, however, suggest that these policies would be better located within the Countryside Chapter of the Plan.
17. The City Council **objects to the lack of a policy to recognise and protect the type of regionally historic environment features** mentioned in the explanatory text of the Plan (Box BE3). This includes historic towns such as Winchester, which are clearly of regional importance and which need policy protection rather than simply to be listed in the explanatory text. This is particularly applicable to specific features such as named historic towns.

South Hampshire Sub-Region

18. The City Council **objects to Policy SH2 in relation to both of the proposed SDAs** on the basis that:
- It is not possible to say whether the SDAs would be preferable to smaller urban extensions in the absence of strategic environmental assessment of the options;
 - Work on the Hedge End SDA has indicated potential problems in relation to traffic and transport, water supply and sewage disposal, and infrastructure provision and it has not yet been demonstrated that these can be satisfactorily addressed;
 - Insufficient work has been undertaken on the Fareham SDA to overcome the City Council's concerns about the landscape impact and traffic implications of this proposal.

The City Council nevertheless **supports the inclusion within Policy SH2 of the references to retaining gaps with Wickham, Knowle and the settlements neighbouring Hedge End.**

19. The City Council **objects to paragraph 2.9 of the explanatory text of Section E1**, which identifies potential local gaps which it suggests may warrant designation. This does not include important local gaps in Winchester District, such as the Denmead/Waterlooville Gap, and thus implies that it may not be appropriate to retain these as local gaps. The explanatory text should not include examples of local gaps but should retain the option of these being designated in Local Development Documents where they are needed, possibly through a new policy on local gaps.
20. The City Council **objects to the inclusion of Policy SH12**, as it considers that the detailed phasing of development should be incorporated within the explanatory text of the Plan as an overall guide, not made into a policy requirement. The Policy as drafted could lead to the Council having to release major unallocated areas of greenfield land, or withhold planned development, simply because development was not achieving the precise phasing proposed. This would clearly be undesirable and cannot be what the policy intends. While the Council accepts the overall housing requirement for the District of 6,739 dwellings, Policy SH12 would result in the provision being heavily weighted towards the first half of the Plan period, especially the 5 years from 2011 to 2016. Although this reflects the strategy for South Hampshire of using urban extensions in the period prior to the SDAs coming on-stream, it gives a very high housing requirement within one District and one 5-year period. This would require annual completions of 760 dwellings per annum over this period, a level which has rarely ever been achieved for the whole District. The annual requirement in other 5-year periods would be much lower. In practice, a more even profile would be more appropriate, as suggested below, albeit still with a surge in development in 2011-2016 as major urban extensions are developed. This would also overcome the potential difficulty of building and marketing this level of development within a relatively small area and in a short period of time.

Period	Dwellings
2006-13	1750
2011-16	2600
2016-21	1800
<u>2021-26</u>	<u>589</u>
Total 2006-26	6,739

21. The City Council **supports Policy SH14** which seeks to ensure that high standards of sustainability are incorporated into new development in the sub-region. The Council suggests that this Policy is a more suitable policy for the region as a whole than the existing policy CC4, to which it has objected.