

WRITTEN STATEMENT TO EXAMINATION IN PUBLIC SOUTH EAST PLAN

ON BEHALF OF CALA HOMES (SOUTH) LIMITED

NOVEMBER 2006

MATTER 9A

REST OF HAMPSHIRE AND ISLE OF WIGHT

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1. INTRODUCTION

- 1.1 This Statement is prepared by RPS (Aztec West) on behalf of CALA Homes in respect of Matter 9 Rest of County Areas, Sub Matter 9A – Rest of Hampshire and Isle of Wight.
- 1.2 The evidence contained herein relates only to sub-matter 9A.1:

MATTER 9A: REST OF HAMPSHIRE AND ISLE OF WIGHT

9A.1 Does the draft RSS take proper account of the capacity of towns/locations in the rest of New Forest, Test Valley, Winchester, East Hampshire, Basingstoke & Deane, and Hart areas for sustainable development (including Policy H1), having regard to existing and future infrastructure provision?

If not, how would any additional growth here impact on the South Hampshire, Western Corridor/Blackwater Valley and London Fringe sub-regional strategies?

2. HAMPSHIRE – COUNTY/SUB-REGIONAL HOUSING FIGURES

- 2.1 Table C3 Section C4 of the draft Plan apportions the annual dwelling requirements for the region, allocating average rates of provision to the ten identified sub-regions and the 'rest of county' areas. For Hampshire this comprises 4,000 dwellings per annum (dpa) to South Hampshire, 1,300 dpa to Western Corridor/Blackwater Valley and 800 to the remaining area of the County.
- 2.2 The overall rate of provision at 6,300 dwellings exceeds by only 1.2% the annual dwelling target for Hampshire prescribed by RPG9. It should also be noted this includes two Strategic Development Areas (SDA) totalling 16,000 dwellings, which the Plan suggests may not be delivered as proposed.
- 2.3 The Plan provides little certainty about the SDA either by way of their precise location or ability to deliver; indeed the footnotes attaching to H1 indicate the proposed dwellings may need to be redistributed within the sub-region. The SDA approach mirrors closely the H4 reserve sites policy of the Structure Plan; allocated as a component of the housing supply to be held back under the guise of Plan, Monitor, Manage. None of these sites have been released.
- 2.4 As will have been debated at other sessions of the Examination, the approach to housing delivery fails fundamentally to deliver the step-change demanded by the Government's Sustainable Communities: Homes for All Plan (para.1.14). The rate of provision in Hampshire remains broadly static, in line with RPG9 which was acknowledged at the time to be insufficient to meet future needs (RPG9 para.8.3). The 'sharper focus' strategy has sought only to redistribute development to concentrated urban areas of the County at the expense of the rest of county areas, without signalling a step-change in delivery.
- 2.5 Policy H1 will deliver greater concentrations of development in Southampton, Portsmouth, Havant and Rushmoor. The quantum of development allocated to central Hampshire falls significantly; extrapolation of the figures demonstrates the six central Hampshire districts would suffer a reduction of around 9,400 new dwellings (circa.40%) compared to the Structure Plan distribution.

- 2.6 The above comparison does not take account of the Structure Plan H4 reserve provision, components of which were located in the central Hampshire area. While this policy was designed to provide a 'safety net' against failure of windfall sites to deliver sufficient numbers of dwellings over and above the individual districts' baseline obligations, it provided the opportunity for development to come forward within the identified areas to help meet RPG9 requirements.
- 2.7 In practice, a positive application of the reserve sites policy has been non-existent; release of the reserve land has been annually resisted in spite of spiralling house prices, a deepening affordable housing problem and repeated failure early in the monitoring period to achieve RPG9 rates of development.
- 2.8 The South East Plan offers the opportunity to address the sustainable development challenge by increasing housing development overall and targeting development to locations that offer the greatest opportunity to achieve positive sustainability benefits.

3. SOUTH HAMPSHIRE SUB-REGION

- 3.1 The South East Plan makes provision for 80,000 new dwellings between 2006 and 2026; 62% would be provided on urban potential sites, with approximately 30,000 on greenfield land (CD/SR3). Final Advice to SEERA from PUSH (CD/SEP12) advises (para.5.7) there is insufficient urban capacity to deliver housing in accordance with a growth strategy of 3.5% GVA by 2026.
- 3.2 The PUSH advice notes that consultation with stakeholders in the sub-region expressed a desire for lower urban capacity figures due to concerns regarding congestion, urban intensification and increasing flood risk.
- 3.3 The Roger Tym & Partners work (CD/SR3) on sustainability appraisal assesses four options for increasing development (Appendix H). These score positively in terms of:
- Affordable housing delivery
 - Improving housing within most deprived areas
 - Improving access to services and facilities
 - Promotion of public transport/access to sustainable transport modes.
- 3.4 Negative impacts are recorded in respect of:
- Flood risk
 - Increasing efficiency in use of land/ use of previously developed land
 - Impact on climate change/reduction of CO2
 - Congestion
 - Air quality impacts on biodiversity.
- 3.5 The analysis concludes that increasing development in the sub-region would have adverse impacts on congestion; would increase car-borne travel and would increase use of greenfield land.

- 3.6 Together with doubts over its urban capacity, there is serious concern as to the ability of the sub-region to absorb in a sustainable manner the level of growth proposed. Accordingly, there should be examination of sustainable development opportunities outside the sub-region.

4. WINCHESTER

- 4.1 RPG9 is the starting point for the new RSS; its emphasis on urban areas; urban renaissance, regeneration; concern for the environment and promotion of the principles of sustainability (Section B para.10.2) remain guiding principles.
- 4.2 The Core Strategy of RPG9 (Chapter 4, Map 2) identifies a network of Major Towns within the region as part of the strategy of concentrating growth primarily within urban areas. Within Hampshire, Winchester and Basingstoke are the only such towns outside the PAER.
- 4.3 Comparison of the Core Strategy plan with the Key Diagram of the draft SE Plan shows that of the Major Towns Winchester is the only one that falls outside of a sub-region or which has no specific policy designation that makes provision for growth. Maidstone and Tonbridge – Tunbridge Wells fall outside of the defined sub-regions but have special status as regional hubs under Policy CC8c; in addition Maidstone is identified as a Growth Point.
- 4.4 In contrast Winchester's allocation is concentrated in the south-eastern part of the district remote from the city and the sustainability benefits that would accrue from development focused there. Policy H1 hides the fact that out of a total allocation of 522 dpa to Winchester District, the majority of the District, including its most sustainable settlement, the city of Winchester, lies outside the South Hampshire sub-region and is allocated just 185 dpa.
- 4.5 While Maidstone is larger than Winchester, Tonbridge (35,000 - 2001) is smaller and Tunbridge-Wells (45,000 - 2001) is similar in size. As the largest settlement in the rest of Hampshire; the County Town and administrative centre, and a significant attractor to in-commuting driven by a severe jobs/housing imbalance, Winchester is unique in Hampshire and should be given similar status. In Winchester existing pressure on the housing market and acute affordability problems demand that development be targeted at the city, rather than the south east of the District.

- 4.6 The 'Future of Winchester Study' (June 1999), undertaken as a response to Policy E19 of the Structure Plan recognised the tension between the historic environment and the needs of a thriving city.¹
- 4.7 The Study identified key weaknesses, which continue to prevail:
- Poor choice and affordability of housing
 - Social polarisation
 - Congestion
 - Poor public transport
 - Restrictions on growth imposed by the historic character of the city.
- 4.8 The Study concludes there is a need for carefully planned growth to address:
- Unsustainable commuting patterns
 - Air quality/congestion
 - Jobs/housing imbalance
 - Finite supply of brownfield sites suitable for development
 - Affordable housing need in the City.
- 4.9 Winchester is a microcosm of the whole sustainable development/sustainable communities' agenda. The challenge is to reconcile the conservation/ environment and economic/ social agendas in a way that preserves the environment while promoting inclusivity and social cohesion.
- 4.10 The SE Plan offers no prospect of "carefully planned growth" or therefore of affordability and environmental problems in the City being resolved.

¹ ***"There is a tension between the need to conserve the historic fabric and setting of the city and the need to provide homes, jobs and other facilities for people who live and work there".***

Labour Market

- 4.11 Winchester is a prosperous and attractive city in which to live and work and functions as an employment destination for many from outside the city and District. Low unemployment and a strong economy based on public administration and healthcare provide stability, but affordability issues precipitate unsustainable commuting patterns.
- 4.12 Winchester District has a resident population of 109,600 (Nomis 2005), of which 55,400 are economically active. There are 64,005 workplaces available within the local economy, which attract 32,200 in-commuters (50.4% of employees) each day, the highest of any Hampshire authority. Of the 30,000 daily in-commuters to the city itself 45% travel in excess of 10km². On average commuters travel much further to access jobs in Winchester than for any other Hampshire settlement; in the County as a whole, just 28% travel more than 10km to work (Census UV80)
- 4.13 Winchester District has the highest job density of any Hampshire authority (1.16); the city's job density is even higher at 1.35 (Census UV28); only exceeded by Crawley (1.39) in the south east. The District, and the City in particular, therefore has an acute imbalance between employment and resident workforce which is wholly unique in the County.

Housing Market

- 4.14 There is a heavy influx of commuters from South Hampshire; approximately 10,000 inward trips occur daily from Southampton/Portsmouth³ demonstrating the strong relationship between Winchester and the conurbation. Indeed, DTZ's Housing Market Assessment for South Hampshire recognises this and clearly identifies Winchester within the sub-regional housing market area. Given that this analysis should have informed regional policy it is surprising that Winchester was excluded from the sub-region.

² 2001 Census Table UV80.

³ Central Hampshire Transport Strategy Panel 2004

4.15 The Regional Housing Strategy acknowledges that high house prices in Winchester have led to problems recruiting and retaining key workers, particularly in the health and education sectors, where health workers and teachers are unable to access housing within reasonable reach of their workplace⁴. Winchester District also has some of the highest numbers of key workers per district in Hampshire and the South East⁵.

4.16 Affordability in Winchester is a significant problem with house prices way beyond most of the working population. In spite of this the housing market remains strong and demand is high. The Council recognises the problem, yet proposes no meaningful solution in spite of acknowledging that:

“The Council’s highest priority is the provision of affordable housing, resulting from the study of Housing Needs and the outcome of public consultation”⁶.

4.17 The Council has no prospect of meeting actual housing need⁷; instead it has set a target for delivering 100 affordable dwellings per year, resulting in accumulating levels of unmet need each year:

4.18 In February 2006 the First Secretary of State acknowledged that the expected rate of delivery of affordable housing in Winchester District (13% of the assessed level of need) represented a *“serious shortfall, which should not be ignored”*. He also acknowledged that *“an unmet need for affordable housing of the magnitude established in Winchester district might justify release of the appeal site”*.

4.19 In dismissing CALA Homes’ appeal relating to development of the Winchester City (North) MDA the Secretary of State concluded that to release the site ‘now’ would conflict with the objectives of the plan-led system. Critically the proposals

⁴ Silchester Place – p.46

⁵ Figure 15 p.45

⁶ Extract WCC – Housing Strategy 2004-07

⁷ 779 dwellings per annum (WCC Housing Needs Survey 2002 - DCA)

were found to be acceptable and sustainable in all other respects; the objection stemmed from the conflict with the plan-led system.

- 4.20 The SE Plan presents an opportunity to deliver significant development at Winchester on a scale sufficient to meaningfully address acknowledged affordability problems.

Sustainable Development Opportunities

- 4.21 Winchester presents a clear opportunity to focus development at a location where need and demand are high in a way that follows sustainable development principles⁸. Because of the existing jobs/housing imbalance; acute affordability problems and high levels of in-commuting, sustainable urban extension(s) with a mix of market and affordable housing would contribute significantly to the achievement of sustainable development objectives. The Winchester City (North) MDA was supported strongly in these terms by the Winchester Local Plan Inspector, who recognised the clear sustainable benefits the site would offer when developed⁹. It would also contribute to likely reductions in overall car use as residents of Winchester make greater use of non-car modes than locations elsewhere in central Hampshire¹⁰.
- 4.22 Winchester encourages residents to consider alternative modes of transport to the private car because of the physically constrained nature of the city. It follows, reasonably, that if a greater proportion of those commuting into the city each day had the opportunity to live closer to their place of work evidence suggests they would consider public transport or walking as a viable means of travel to work. In short, because of its concentrated employment base and physically

⁸ PPS3 (Nov.2006) Paragraph 37.

⁹ Winchester District Local Plan Inspectors' Report – September 2005. Paragraphs 6.5.6, 12.15.30

¹⁰ *"The nature of Winchester city's road network serves to constrain car use (42% of residents travel to work by car – one of the lowest proportions in Hampshire)...A high proportion of people also walk to work (43%). Advantage should be taken of this propensity to walk to reduce the perceived need to travel by car. Central Hampshire Transport Strategy (para.3.237)*

constrained fabric, development at Winchester would assist in promotion of more sustainable modes of travel.

- 4.23 An added incentive recognised as an 'Opportunity' by the Central Hampshire Transport Strategy is that large developments 'planned' for Winchester (Winchester City North MDA) will be used to promote alternative travel choices; allied to the Winchester characteristic of low levels of car use, high levels of bus use and walking the opportunity exists to promote sustainable travel through development targeted at Winchester.

5. CONCLUSIONS

- 5.1 Winchester has strong functional links with the South Hampshire sub-region; it falls within the proposed sub-regional Housing Market Area of South Hampshire¹¹ and is acknowledged to have strong functional links from an employment and retail perspective (D9 1.26) attracting a significant volume of in-commuting from the south.
- 5.2 It is the largest town outside of the Hampshire sub-regions and offers significant potential for balanced and sustainable growth. There is an acknowledged affordable housing problem of a magnitude which the plan-led system cannot ignore. The First Secretary of State acknowledged the positive case for development at Winchester, but concluded it could not be delivered outside the plan-led system.
- 5.3 Without allocation of development on a meaningful scale through the SE Plan the problems of in-commuting, affordability, transportation-infrastructure planning and imbalance between jobs and accessible homes will not be addressed.
- 5.4 The Roger Tym study demonstrates that South Hampshire as currently defined will struggle to accommodate additional housing in a manner consistent with sustainable development objectives and alternatives within the rest of county area do not compare favourably with Winchester as a sustainable location for development.
- 5.5 Development at Winchester presents an opportunity to realise the objectives of the SE Plan; to increase the supply of affordable housing; to widen housing choice; to precipitate more sustainable patterns of development and to reduce impacts on climate change. Indeed, as currently drafted, by directing housing away from Winchester the SE Plan conflicts fundamentally with the clear national policy advice of PPS3.¹²

¹¹ Hr14 p.70

¹² Paragraph references 10, 16, 33 and 36 – 38.

- 5.6 The Plan must increase residential development at Winchester either by reclassifying it as a regional hub or by incorporating it into the South Hampshire sub-region.