

# Twyford Parish Council

## Representation on the Winchester District Local Plan

8<sup>th</sup> December 2022

Twyford Parish Council (TPC) welcomes the publication of this updated Local Plan. Despite its length, it is easy to find the way around and the arguments are set out policy by policy in a clearly written and comprehensible format. Twyford welcomes the ambition of the plan in directing itself to climate change, excellence in design and protection of the natural environment while continuing to build on previous plans.

Twyford is wholly within the South Downs National Park (SDNP) but is surrounded on three sides by Winchester District with multiple interactions in all directions with over a range of activities and land uses. The recognition of these interactions is vital; it is most encouraging that the Draft Local Plan refers to the Twyford Neighbourhood Plan (TNP) as one of the component parts of the Statutory Development Plan for this part of the SDNP.

The Twyford Neighbourhood Plan (TNP) was made by the SDNP Authority (SDNPA) in February 2022. It looks at cross border issues and has framed its policies to mesh in with those of the WDLP. The chief cross border issues are:

- Landscape
- Gaps between settlements (Twyford - Colden Common)
- The Itchen Valley
- Green/blue infrastructure
- Traffic

TPC has also considered the direct impact of the WDLP proposals for housing and employment on Twyford, particularly new housing in Colden Common and Bishops Waltham and new employment at Bushfield.

**The following comments should be treated as a formal objection which the Parish Council would be happy to discuss further.**

1. Landscape: policy NE9: Twyford commissioned a bespoke landscape study as one of the key building blocks of its Neighbourhood Plan. This study by Terra Firma builds on the existing studies of both Winchester and the SDNPA and also that of the City of Winchester Trusts (The Setting of the City of Winchester). Reference should be made to the Terra Firma Study in the WDLP Evidence base. This is available on the Parish Council's website: <http://twyfordhants.org.uk/wp-content/uploads/2022/12/Twyford-Parish-Landscape-Assessment.pdf>  
WDLP Policy NE 7 proposes a comprehensive network of gaps particularly for the villages surrounding Winchester. The gap between Winchester and Twyford is sufficiently protected by the Itchen Valley, St Catherine's Hill and Twyford Down and by the Motorway, but the gap between Colden Common and Twyford is a typical narrow separation of the two settlements with their own character; both communities see this separation as important to their identities. It is under pressure for development. The TNP includes it as a protected gap by LHE 1, but stops at the Parish/WCC boundary, leaving out the important parts of the gap in Colden Common Parish. The Parish Council seeks you to consider the inclusion of a matching policy to LHE1 in consultation with Colden Common Parish Council.
2. There should be a new bespoke freestanding policy for the Itchen and its Valley within the NE policies. In the Draft WDLP the Itchen River and Valley is covered by numerous generic policies in the Natural Environment chapter i.e.: NE 1; 3-10; 13-17.  
The Itchen is a functioning ecosystem of international importance; it should be treated as such for planning and other administrative purposes. Moreover, the Itchen is under threat

from a variety of factors. The river and its valley are sufficiently important to merit a policy of their own to bring together this wide range of considerations. Coordination with adjoining authorities is essential. Ideally this new policy should be prepared jointly with SDNPA, Twyford and possibly also Eastleigh, but this may be at a second stage.

3. An upgrade of the blue/green infrastructure policy.NE4 is required. The key plan in support of this policy does not identify and green infrastructure but only blue (the rivers and sea) and “designated sites”, but all at a scale which is not fit for this purpose.
4. The TNP sought to identify the green/blue land within its own parish and considered the potential for this to be part of a wider network. Twyford’s policy does not appear to have been identified by the WDLP. TNP shows the North/South line (the Itchen Valley) and the links to the east of the Itchen (Hockley Golf and Twyford Down) as green/blue infrastructure, but does not show the swathe of countryside (Shawford Down and land to N and S of Compton Street on the west. The new allocations on the west side of the Itchen Valley added to the existing urban development of Compton/Shawford/Otterbourne along the west are now further compromising the Itchen Valley-to-countryside connections and with it the setting of Winchester. There is a need for this policy to be given further consideration.
5. An objection to the Bushfield development as it will lead to a further increase the large number of commuters from the S and East using B3335 and also on the following grounds;
  - o general sustainability
  - o landscape impact
  - o no need for more jobs in Winchester
  - o better located in S Hants

Serious consideration must be given to the impact of traffic arising from new housing along the B3335 and B2177 corridors on the upstream settlements. The further housing proposed for Colden Common (approx140 dwellings) and in Bishops Waltham will lead to additional traffic to B3335 which passing through the centre and historic core of Twyford. This will cause additional noise, pollution and congestion to the many residents living in the vicinity of the road and generally degrade the local environment and historic fabric. At present there is inadequate provision made for mitigating the harm caused by new development. Works required to mitigate this harm to Twyford should be a prior requirement of development along the B3335 and B2137 corridors, including the application of CIL. The requirement should be tied also to the upgrading of cycling facilities for commuters along the B3335 corridor at present held up primarily by the excessive speed limit (60 mph) on the Twyford to Hockley stretch of B3335.

Finally, there are the following additional points:

6. In relation to the SDNPA (Policy NE 8), the draft plan should restate the Statutory Duty imposed by the Environment Act 1995 para 62(1) (1)- (3). This requires WCC to have regard to the National Park purposes in any of its decisions that affect it. The duty is not limited to the National Park Authorities and is not limited to land only within the National Park. As this Duty must affect decisions made by WCC as Local Planning Authority it should be clearly restated in the Local Plan as a central consideration in its decision making.
7. Policy SP 2 Spatial Strategy. the basis for deciding the distribution between the three components of the District is unclear. South Hampshire has been the main focus for growth and development yet in this plan the numbers in the rural settlements and the City far exceed those in South Hampshire.

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