

Winchester City Council have indicated comments may be made on their Schedule of Modifications which have been prepared in light of representations made to the pre-submission version of the Plan or in the light of the publication of the National Planning Policy Framework (NPPF) in March.

These comments are made mainly in the light of the NPPF which I contend supports my representation that the designation of Bushfield Camp (BC) as an opportunity site is not justified. The following paragraphs are relevant to this.

1. Para 14, states there is a presumption in favour of sustainable development at the heart of the NPPF which should be seen as a golden thread running through plan making and this is stated to mean that local plans should meet objectively assessed needs. At the core of policy WT3 there is no objectively assessed need to be met by development on this site, so it fails the fundamental requirement of satisfying the sustainable development presumption.

This failure is further exposed in the Plan-making section in paras 152 and 154. In para 152 significant adverse impacts on the three dimensions of sustainable development should be avoided and alternative options should be pursued. The lack of a need for development at BC and the environmental damage that would follow if development occurred on this sensitive site should mean no development would be acceptable here.

In para 154 there is a requirement for clear policies on what will or will not be permitted and where. The policy is unclear about the type of development which would be suitable and so fails this test. Although Modification 48 attempts to bring some clarity to the policy, the opening sentences acknowledge that the policy cannot really be clear about what development will be allowed.

2. . In Section 11, Conserving and enhancing the natural environment, paras 109, 110 and 111 are particularly relevant in support of the case against development at BC.

Reference is made in para 111 to previously developed land (and in the core planning principles in para 17). In the past there have been differing views on whether BC falls within the definition of previously developed land (pdl). Even if it is considered to be pdl, paras 17 and 111 state that it should not be redeveloped if it is of high environmental value which the Local Plan acknowledges is the case with BC.

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