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30 July 2012

Our ref: 151070

Dear Ms Morton,

**Winchester Local Plan Part 1 – submission  
Representations by Bloor Homes Ltd (30104)**

Thank you for the opportunity to add to representations submitted on behalf of Bloor Homes Ltd (reference 30104) at pre-submission stage, in response to the proposed modifications and the publication of the National Planning Policy Framework (NPPF).

*Proposed modifications*

While the purpose of **modification 18** is acknowledged to be a response to the publication of the NPPF, we do not consider that the Winchester Local Plan Part 1 (WDLP1) (as modified) has been positively prepared to deliver sustainable development. Therefore, while this modification recognises what the WDLP1 is required to do, as we set out in our comments below, it does not reflect this in its development strategy.

**Modification 26** includes addition of the words “objectively assessed development needs of the District”, as the response to the publication of the NPPF. Whilst this modification reflects the requirements of the NPPF (see further comment below) the plan fails to follow through on this statement because the housing target for the district is not supported by objective evidence to justify the proposed reduction in

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housing numbers from the South East Plan.

The key objective to ensure the right amount of development to support communities (proposed **modification 71**) is generally supported. However, clarification is still required over the approach to development in the MTRA area. The WDLP1 focuses housing growth in the spatial areas of Winchester Town and the PUSH area. Villages in the PUSH area should not be subject to the same indicative ceiling of housing growth as villages elsewhere in the district. Villages such as Wickham, which is noted to perform well in terms of services and connectivity in the sustainability appraisal, may be able to sustain a higher level of growth over the plan period. **Modification 68**, which is supported, acknowledges that Wickham is a district centre with potential to deliver additional retail and leisure floorspace. Its status in sustainability hierarchy terms is therefore more akin to that of New Arlesford and Bishops Waltham, which are allocated higher housing numbers.

As is proposed in modification 71, achieving the right amount of development for communities is the objective. Together with the new presumption in favour of sustainable development introduced by the NPPF, the strategy for MTRA should be amended in respect of the proposed arbitrary limitation of homes at Wickham, to a number proportionate to the housing allocated for the two other main centres in the MTRA (New Arlesford and Bishops Waltham).

Notwithstanding the above, clarification is needed in regard to the housing number allocated in the MTRA area. The figure of 1,500 homes quoted in paragraph 3.69 of the plan should be amended to the higher figure in the allocated range. Using the lower figure is potentially misleading for local communities and the development industry because the plan allocates a *range* of between 1,500 and 2,500 homes in the MTRA.

#### *National Planning Policy Framework*

Published since the pre-submission consultation, the NPPF confirms the Government's introduction of a presumption in favour of sustainable development. Paragraph 14 of the NPPF explains that, for plan-making, this means local planning authorities positively seeking opportunities to meet the development needs of their area. It goes on to clearly state that local plans should meet *objectively assessed* needs.

The importance of planning for objectively assessed needs is reiterated in paragraph 47, under the overarching objective of "*significantly boosting*" (emphasis added) the supply of housing.

Background Paper 1 (Housing Provision, Distribution and Delivery) has been published since the pre-submission consultation. Paragraph 3.20 states that the Council's preferred local housing target (Scenario 1) is justified as it "seemed realistic" and best able to meet the aims expressed through the Blueprint consultation exercise. This proposed locally-derived housing target, which would reduce the South East Plan requirement by around 10%, does not represent an objectively assessed target. For example, it fails to account properly for sub-regional housing need, failing

to positively respond to objective evidence in the SHMA and the growing backlog in affordable housing provision.

Therefore, in the absence of an objectively assessed locally-derived housing target, the South East Plan requirement remains the only sound local housing target.

A further requirement of the NPPF is for local authorities to identify a 5% buffer against their 5 year housing supply (paragraph 47), or a 20% buffer where there is history of persistent under-delivery. Background Paper 1 suggests that a 5 year supply of housing land can be maintained, other than at the "very start" of the plan period (paragraph 6.56). The assessment of housing supply should be over a rolling 5 year period. The plan start-date, however is 2011, rather than the start of the South East Plan (2006). The total housing completion figures listed at paragraph 6.44 identify that there has been under-delivery since 2006 against both the proposed annual locally-derived housing target and the South East Plan annual requirement. The Council's assessment of housing supply and housing trajectory should be amended to take into account this period of under-supply to accurately reflect the housing supply position and be in conformity with the NPPF.

We trust that these representations will be given due consideration alongside comments submitted at the pre-submission stage.

Yours sincerely,

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Jacqueline Mulliner  
Director

cc Ron Hatchett, Bloor Homes Ltd