

## **Representations on behalf of Persimmon Homes (South Coast) Ltd**

### **By Southern Planning Practice Ltd.**

These representations should be read in conjunction with the representations submitted by Southern Planning Practice on behalf of Persimmon Homes (South Coast) Ltd to the Pre-submission draft Local Plan Part 1 – Joint Core Strategy.

a)

### **Winchester District Local Plan Part 1 – Joint Core Strategy**

#### **Schedule of Proposed Modifications June 2012.**

**Modification 18** – the addition of wording to indicate a positive approach to reflect the presumption within the NPPF in favour of sustainable development is welcomed, but there is little detailed evidence of how the Plan has been amended or requires to be amended to reflect this positive approach. The approach to development outside of Winchester and the South Hampshire Urban Areas, for example, does not reflect the positive approach envisaged in the NPPF, and very limited modifications are proposed to bring it into line with the Framework.

**Modification 71** – the Modification with the deletion of the word ‘total’ makes very little difference to the intention of the Policy

The addition of the final sentence is welcomed but the overall objective is now further confused and makes the policy objective ambiguous and so is UNSOUND – how is the housing figure of 1500 across all the relevant settlements to be interpreted?; would development in one settlement which exceeds the 1500 but which provides *the right amount and type of development, so that existing communities can remain viable with access to services they need* but does not have *support of the communities* be supported by the Council, especially where it is shown to meet the sustainability objectives of the NPPF?

**Modification 72** – the first modification to support new employment growth is welcomed and accords with the promotion of business growth in the NPPF.

b)

### **Representations on the National Planning Policy Framework**

- i) The Council’s Local Plan, including through its evidence base and Background Paper 1 on Housing Provision, Distribution and Delivery (June 2012) seeks to justify the selected figure of 11,000 new homes over the Plan period – it is questioned whether this figure, which falls below the South East Plan figure and other more recent assessments of housing need can be said to accord with the guidance at Paragraph 47 of the Framework which states that: *To boost the supply of housing, local planning authorities should: use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area.....*

- ii) It continues to be argued that the Council is artificially holding back the appropriate scale of housing development for the district which is not covered either by Winchester Town or the two Strategic Housing Allocations at Land at West of Waterlooville and Whiteley, and that the approach is contrary to the spirit and objectives of the NPPF. The approach to focus development in such limited locations and indeed over a very small number of large sites is unlikely to meet the Framework's principal objective to deliver a wide choice of high quality homes (Section 6).
- iii) Following on from above, there remains a particular tension in terms of the Council's approach to development in the Market Towns and Larger Villages and the positive presumption in favour of sustainable development which is the basis of the NPPF.

The Ministerial foreword to the NPPF sets out the Government's approach:

*Development means growth. We must accommodate the new ways by which we will earn our living in a competitive world. We must house a rising population which is living longer and wants to make new choices. We must respond to the changes that new technologies offer us. Our lives, and the places in which we live them, can be better, but they will certainly be worse if things stagnate.*

The objective to ensure that individual communities are properly involved in determining the future shape and form of their settlements is supported, but the policy framework in the Local Plan needs to be positively couched to ensure the realisation of wider and longer term objectives, in terms of meeting housing, employment and other needs. This is not the approach undertaken under Policy MTRA 2, especially towards the provision of market housing. The provision of market housing will, in almost all scenarios provide the catalyst to securing other identified requirements, including affordable housing, employment, community and associated infrastructure, all of which will combine to secure the maintenance and improvement of the role and function of individual settlements.

There remains a concern with the policy wording of MTRA 2 in terms of supporting development of these settlements but then seeking to restrict development to within existing settlement boundaries unless it can be demonstrated that the development would meet a specific need. The current wording could too easily be interpreted as being against market housing and this is not in the spirit of the guidance in the NPPF.

- iv) There appears to be inadequate evidence to justify the Council's position that it is not persistently underperforming and therefore does not fall into the category of LPAs which should provide 20% additional available and deliverable sites (paragraph 47 second bullet point).
- v) OBJECTION must therefore necessarily be raised at this stage that the draft Plan is UNSOUND on the basis that it does not accord with up to date government guidance as set out in the NPPF.

