

email address: will.thompson@cgms.co.uk
Direct Dial: 020 7832 1462

Our Ref: WT/AC/12681

Programme Officer Winchester District Local Plan Part 1
Winchester City Council
c/o Strategic Planning
City Offices
Colebrook Street
Winchester
SO23 9LJ

140 London Wall
London EC2Y 5DN

Tel: 020 7583 6767
Fax: 020 7583 2231

www.cgms.co.uk

Offices also at:
Birmingham, Cheltenham,
Dorset, Edinburgh,
Kettering, Manchester,
Newark

30 July 2012

Dear Sir/Madam

SUBMISSION OF WINCHESTER DISTRICT LOCAL PLAN PART 1 – JOINT CORE STRATEGY

I write on behalf of my clients, the Land Owners of Land off Upper Moors Road, Colden Common, to update my previously submitted representations of 9th March 2012 on the submission DPD in light of both the Council's Schedule of Modifications and the publication of the National Planning Policy Framework (NPPF).

Schedule of Proposed Modifications (June 2012)

Modification number 18 – we support this revision which reflects the core planning principle of the presumption in favour of sustainable development as set out in the NPPF.

Modification number 71 – we support the clarification that local housing needs may be in excess of 1,500 dwellings per settlement, and that this figure should not act as a ceiling limit for settlements. However, the current wording requiring community support on particular proposals is considered to lack flexibility and is a potential barrier to delivering sustainable development which might otherwise accord with Development Plan policy. There is no plan-making guidance which justifies this sole reliance on community support.

Modification number 73 – we support the principle of this additional text which confirms that a combination of development management and plan-making will help deliver new development proposals.

Modification number 75 – we consider that the revised policy text, with a continued reliance on the District’s housing requirement being delivered in the short to medium term within existing built-up areas, will fail to deliver a wide choice of housing to meet demand in the early plan period. Such an approach conflicts with paragraph 50 of the NPPF as well as proposed modification 90 (see below). For settlements within the District that have constrained ‘built-up area opportunities’, there is a demonstrable need to bring larger greenfield sites forward earlier in the plan period to ensure that a wide mix of housing, particularly affordable housing, comes forward to meet identified need. As identified at paragraph 7.53 within the Winchester Housing Market and Housing Need Assessment Update (2011) there is a demonstrable need for affordable housing. Utilising greenfield land would also ensure that linked infrastructure would come forward in tandem.

Modification number 78 – whilst we support the principle of the policy revision to allow for greenfield release in the shorter term, we consider that the release of greenfield land through planning allocations only (Local Plan Part 2) will not allow sufficient flexibility to meet housing delivery requirements in the shorter term within the District, particularly in and around settlements with limited development opportunities within the built-up areas. Such an approach is considered to be inconsistent with paragraph 47 of the NPPF which seeks to boost significantly the supply of housing. It is also considered that the policy is inconsistent with modification 73 which states that infrastructure provision will come forward through both the development management process and site allocations.

Modification number 90 – we support the additional text which will assist in alleviating current shortfalls of affordable housing within the District’s market towns and rural areas. We do however consider that the text should be expanded further to promote the delivery of affordable housing in rural areas through larger market housing developments. Such an approach would be consistent with paragraph 54 of the NPPF which notes that LPAs should consider whether allowing market housing in more rural areas would facilitate the provision of significant additional affordable housing to meet local needs.

Yours faithfully



Will Thompson
Director