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Dear Ms Morton,

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

### **Comments on Further Modifications**

I write in response to your letter dated 12<sup>th</sup> November 2012, on behalf of Linden Homes Strategic Land (respondent no: 30048) regarding the opportunity to comment on the proposed further modifications to the Winchester Joint Core Strategy.

Linden Homes Strategic Land participated in Day 2 of the Examination (Housing – General). Our comments on the further modifications are set out below. These should be read in the context of our two statements submitted to the EiP in which we considered that the distribution of new homes should be increased towards the Winchester market area (see statement of responses to Inspector's questions (i) and (ii)). Additionally we determined that a key role of the Part 1 Plan is to set a framework for Part 2 and that a commitment to an additional urban extension within the Winchester Spatial Area is an essential part of that framework in delivering the housing requirement for Winchester.

We note modification number 2.4 which proposes the addition of the word 'about' in front of the housing targets for each of the spatial areas within Policy DS1: Development Strategy and Principles. Although we welcome the addition of the word in bringing some flexibility to the housing targets for the spatial policy areas, it is considered that this phrasing does not go far enough in introducing the flexibility in housing delivery required by the NPPF. In particular, it does not emphasise the Government's objective for housing, set out in paragraph 47 of the NPPF to "*boost significantly the supply of housing*". A more appropriate preface to the housing target would be 'at least', which would ensure that the target is viewed as a minimum, and not a ceiling or approximate figure to be reached during the Plan period. This is consistent with our concerns with regard to the housing target for the Winchester area, and our evidence to the effect that the distribution should be altered towards a greater housing provision in this location (although please note we are seeking an increase in the requirement for the Winchester Area regardless of the prefix wording to the housing figure)

Examples of other Local Planning Authorities which have adopted this form of wording include West Berkshire in their Core Strategy which was adopted in July 2012 having gone through a lengthy



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examination process, and West Oxfordshire in their Submission Draft Local Plan October 2012 document. In the West Berkshire Core Strategy, the Inspector recommended insertion of the words 'at least' in front of the over-arching housing target for the District, and the word 'approximately' in front of the housing targets in each of the spatial areas. The Winchester Joint Core Strategy does not include an overarching policy setting out the District-wide target, and therefore the only location within the Plan to clarify that the target is not a ceiling is in relation to the spatial area targets set out in Policy DS1. West Oxfordshire has taken a similar approach in prefacing the strategic housing target with 'at least' and the sub-area targets as 'around'.

The phrasing 'at least' should also be added to the second spatial planning objective, in para. 2.18 of the submission Core Strategy in front of the overall target for the District of 11,000 homes. This would ensure consistency of approach between our suggested wording for the proposed modification 2.4 and the remainder of the Plan and conformity with the objectives of the NPPF to boost housing supply and ensure flexibility over delivery.

I trust that the above comments will be given due consideration in the Inspector's final report.

Yours sincerely

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