



Save Barton Farm Group
SBFG Response to Further Modifications

LETTER TO INSPECTOR/PROGRAMME OFFICER

Dear Miss Morton,

Thank you for your letter dated 12th November, 2012. We have a few comments on the further Modifications to LPP1-JCS ('the Plan') proposed by Winchester City Council ('WCC') following the Hearing. We hope they will be useful in improving the Plan. They are listed below.

1. Modifications: 2.4 (policy DS1, first three bullet points); 2.7 (policy WT1, first bullet point)

As you know from our previous representations and our comments at the Hearing, we have serious doubts about the postulated need for 11,000 new dwellings in the District over the Plan period. We believe the need will, for economic reasons, be somewhat less than this. We also have very serious doubts about the method and logic underlying WCC's decision to allocate 4,000 of the new dwellings to 'Winchester Town' ('WT') and whether that decision was influenced or preceded by a proper consultative process.

Nevertheless without prejudice to, and without derogating from, our above position we suggest that the insertion of the word "about", as proposed in these modifications, is unsuitable. At the Hearing we listened to the arguments in favour of modifying the Plan's housing numbers so as to make them more ambivalent. Some argued that the numbers should be preceded by "at least"; others by "up to" or "no more than" or the equivalent. The discussion mostly involved WCC officers and developer interests; some wanting the potential to build more, others to be able to build fewer should circumstances turn unfavourable. In these Modifications a compromise position has been proposed, while still introducing the ambiguity desired by some. This, we suggest, is unsuitable for the Plan.

It is unsuitable for the following reasons:

(a) The Plan needs to set out strategic new housing objectives. These should be clear, certain and definite, since so much depends on them. There is no place for ambivalence or ambiguity.

(b) The Plan sets out these objectives implying that they will be sought with discipline. Variances from the Plan's strategic housing figures should be considered and tolerated only if clear and thoroughly explained reasons are given. This is not to say that housing numbers cannot be varied on occasions, in the context of making subsidiary plans, considering Applications, or responding to external events, but if this happens it is necessary to explain why and by how much the revised numbers are allowed to vary from the original base figures. Ambivalence when initially setting the base figures dilutes their usefulness and value; and it introduces doubt as to their purpose.

(c) In this Plan the new dwellings figures postulated for the District and for WT are treated as firm targets and very important conclusions are then drawn in respect of other detailed areas and Plan policies, on the assumption that those figures will remain absolute. For example, the whole Plan's construction depends on the basis of WCC's certainty that the District new housing figure should be '11,000' and the WT figure should be '4,000'. Throughout the Plan's progress WCC officers have been adamantly insistent and consistent about these figures when informing Councillors and the public. These figures are also intended to be used when making subsidiary Plans and when monitoring actual performance and completions.

Some may think that inserting the word 'about' enables the Plan to demonstrate the desired ability to respond flexibly to changes in circumstances. We do not agree. In order to respond flexibly to matters that might cause a deviation from a target one needs to know with reasonable certainty what that target is. The Plan must therefore contain clear, unambivalent targets for the main housing numbers and sites. In any event, WCC have already responded to the requirement for including 'flexibility' by using text such as now appears in paragraphs 3.36 and 3.72.

It is said that the introduction of ambivalence is "to provide consistent terminology ... regarding the housing provisions." We suggest that seeking mere similarity of words is not as important as clarity of meaning and purpose. We propose that the word 'about' is **not** inserted.

Consequently we disagree with Modifications:

2.4. (DS first three bullet points)

2.7. (WT1 first bullet point)

2. Modification 2.20 (policy MTRA2 second paragraph)

In the case of this Modification (MTRA) there is, in addition to the reasons in 1 above, another reason for not inserting the word 'about'. The number of new dwellings proposed for the MTRA main settlements was set from the outset as a range indicating the minimum and the maximum for each, with local needs then determining the precise number. There is, therefore, no need to make these figures more ambiguous. They already have minimum and maximum values, between which actuals may vary.

We therefore disagree with Modification:

2.20 (MTRA2 second paragraph)

3. Modifications 2.7 (policy WT1 first sub-bullet point); 2.12 (policy SH1 second and third bullet points)

These two Modifications include possible alternatives. In each case we prefer the alternative "40% should ..." We think the words 'should be' are more suitable for this Plan document, rather than 'is expected to be', which sounds little more than a passive observation or comment.

4. Modifications 2.23 (para. 5.9 Table) and 2.45 (Appendix F) "Housing Trajectory"

The modified Housing Trajectory tables, both in Paragraph 5.9 and in Appendix F, now seem, at least in layout and nomenclature, somewhat misleading.

The tables describe and enumerate the Sources of Housing over the Plan period. The impression given is that, under the sources listed, the numbers indicate how many sites are, or are likely to be, available.

In fact the numbers, even as now modified, indicate merely how many WCC propose to make use of in meeting their predetermined targets - a number significantly less than that which will actually become available to them.

We suggest that the tables be further modified so as to display the full value of the sources, illustrating in particular the full number of windfalls likely to materialise over the Plan period.

These are presently not shown in full in the tables as now set out.

The Tables (and the associated graph in App. F) could be modified to show distinctly not only (i) all the Sources, but also (ii) the Plan's intended figures and then (iii) the Completions for information and monitoring purposes. They would then become useful to Councillors and the public who could see how many sites are expected to be surplus and/or which have not been counted when coming to important planning decisions.

When the Tables and Graph were being modified, we hoped they would also have been modified as described above. We think the layout should have been modified to be more explicit. We suggest the above changes to the modifications to the Table and Graph.

Accordingly we do not agree with Modifications 2.23 and 2.45 as presently drafted

Chris Slattery, SBFG Secretary
On behalf of Chairman Gavin Blackman
07 December 2012