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Our Ref: WT/LW/12681

Rosemary Morton
Programme Officer
Winchester District Local Plan Part 1 – JCS
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19 December 2012

Dear Rosemary

**WINCHESTER DISTRICT LOCAL PLAN PART 1 – JCS
SCHEDULE OF FURTHER MODIFICATIONS 12 NOVEMBER 2012
RESPONSE FROM THE LAND OWNERS OF LAND OFF UPPER
MOORS ROAD, COLDEN COMMON (RESPONDENT NUMBER:
20243)**

I write on behalf of my clients, the landowners of Land off Upper Moors Road, Colden Common, in response to the Council's further modifications dated 12 November 2012 and your letter of the same date.

Modification numbers 2.4 and 2.20 – insertion of the word 'about' prior to the suggested target provision & ranges for new homes across the district and in MTRA 2 settlements.

We support the Council in providing consistent terminology in the Plan regarding housing provisions. However we object to the use of the word 'about', which does not conform with Government guidance set out in the National Planning Policy Framework (NPPF).

The NPPF requires Local Plan policies to be clear so that sustainable development can be approved without delay (para 15); endorses a core planning principle of providing a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency and setting a clear strategy for allocating sufficient land which is suitable for development (para 17); requires LPAs to draw up Local Plans which set out a clear economic vision and strategy which positively and pro-actively encourages sustainable economic growth (para 21); requires the supply of housing to be boosted significantly (para 47); and requires policies to provide a clear indication of how a decision maker should react to a development proposal (para 154).



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The word 'about' does not lend itself to clear policy guidance and this lack of clarity will cause uncertainty and confusion for all those involved in the delivery of housing and economic growth in Winchester, whether Developer, Objector or Decision-Maker. A combination of uncertainty and competing interests will result in further delay to the pressing need for more housing throughout the District. The definition of 'about' (approximately, near in number, all around, on every side etc) means that the policy as worded supports the provision of a number of homes below, within or above the provision/ranges, which does not provide a predictable and efficient approach as required by the NPPF.

In responding to planning policy consultations undertaken by the Council, local communities have highlighted various needs within the district, including community facilities, affordable housing and infrastructure provision. In its response to the Council's Blueprint Consultation Process (July 2011) Colden Common Parish Council identified a need to promote development suited to local housing needs, particularly for affordable housing or for older people; to provide a range of housing for local people; and to provide for and support local businesses. These benefits will not be delivered to local communities for a significant period of time if the quantum of new housing development is restricted to sites within MTRA settlement boundaries and by a numerical range which is vague and open to interpretation.

Recommendation

Policies DS1 and MTRA 2 should be amended by replacing the word 'about' with 'at least' and additional wording should be inserted to make it clear that the figures of 4000, 5500 and 1500 new homes in policy DS1 are not maximum targets but minimum targets. Additional wording should be added to make it clear that the upper level of the range set out in policy MTRA2 should be targeted rather than the lower level (e.g. at least 250 new homes in Colden Common).

These representations follow those that were submitted on behalf the landowners of land off Upper Moors Road to the Council/Programme Officer on 9 March 2012, 30 July 2012 and 12 October 2012.

Please do not hesitate to contact me should you have any queries.

Yours sincerely

A black rectangular redaction box covering the signature of Will Thompson.

Will Thompson
Director