

- i) *Are the policies and proposals for growth and change in this area appropriate and justified, including in relation to the NPPF/PPG, and in terms of environmental, economic and social impacts?*
- 1.1 The policies for growth and change are not appropriate or justified as they do not allow for sufficient development to come forward to meet the housing requirement.
- 1.2 Notwithstanding the fact that the housing requirement set out in LPP1 is based on an out of date evidence base, Policy WIN 1 is not sufficiently flexible to respond to circumstances where development does not come forward as expected and as such, there is a real risk that the housing requirement set in LPP1 will not be met.
- 1.3 One of the fundamental objectives of the NPPF is to boost significantly the supply of housing (paragraph 47). Local Plans are required to plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF (paragraph 157). Policy WIN 1 will not provide the flexibility for sustainable sites on the edge of settlements to come forward to contribute to the supply of housing or to deal with a shortfall in the housing requirement.
- 1.4 Policy WIN 1 should be amended to refer to development within and adjoining Winchester Town rather than simply to the defined settlement boundary to allow proposals that are consistent with the identified principles to come forward. As currently drafted, it is in conflict with the spatial planning vision for Winchester in Policy WT1 of LPP1 summarised in paragraph 2.4 of LPP2, which refers to the provision of new homes through development and redevelopment of existing sites and premises within and adjoining the defined built-up area.
- ii) *Are they clear and deliverable, including in respect of the associated infrastructure requirements?*
- 1.5 Policy WIN 1 is not clear and deliverable. The application of the principles should be clarified in Policy WIN 1 e.g. a housing development is not going to encourage economic prosperity by reinforcing its reputation as a regional centre for creativity and culture in the same way as an application for employment development is not going to provide a range of housing.
- 1.6 Policies WIN 1 and WIN 2 do not refer to infrastructure requirements. This is particularly important in respect of Policy WIN 1 as it is seeking to constrain new development to sites within settlement boundaries. This is likely to lead to ad hoc development putting pressure on existing infrastructure and with no consideration of the long term infrastructure requirements of Winchester Town.