

Rosemary Morton
Local Plan Programme Officer
Winchester City Council
c/o Strategic Planning
City Offices
Colebrook Street
Winchester
SO23 9LJ

23 July 2012
Our Ref: C-0199284-01

Dear Ms Morton

Response to the WCC Local Plan Proposed Modifications Schedule The BST Group (previously The Benge Estate)

On behalf of our client, The BST Group, I write to provide comments on the Winchester City Council (WCC) Local Plan - Schedule of Proposed Modifications.

The BST Group have been referred to as The Benge Estate in previous representations issued to WCC in response to consultation on the emerging Local Plan.

The comments detailed below are provided in the context of the National Planning Policy Framework (NPPF) and are concerned with the following proposed modifications to the WCC Local Plan.

- Policy SH4 - North of Fareham SDA Modification ref. 62
- Policy CP18 – Settlement Gaps Modification ref.135

We note that WCC has not amended Policies SH4 or CP18 to take account the recommendations of the BST Group (formerly referred to as The Benge Estate) representation to the pre-submission draft. However, the minor amendments to each policy do not give rise to any further concerns.

The BST Group supports the principle of these policies, but wish to reiterate the original objection as no reasoned response to it has been provided, and no further evidence to restrict the use of the land so as to preclude its use for Green Infrastructure has been presented.

We draw attention to the definition of Green Infrastructure on page 52 of NPPF:

“A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities”.

Also paragraph 114 of NPPF which states:

“Local Planning Authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of bio-diversity and green infrastructure...”

To be consistent with national policy, namely, to fulfil WCC's duty of co-operation (paragraph 178), to make the most effective use of land (paragraph 111), and to plan positively for Green Infrastructure (para 114), the open land defined in policies SH4 and CP18 should be defined as Green Infrastructure, in accordance with the definition of Green Infrastructure provided in the NPPF (page 52). Its rural character and openness would still be protected, but the policy should recognise that the land could be managed to provide a range of Green Infrastructure activities, that would enhance and serve Knowle and Wickham.

On behalf of BST Group, we request that we be kept informed of the progress of the Local Plan Examination and future LDF documents, and wish to reserve our client's position to submit further representations on subsequent documents.

Yours sincerely

A black rectangular redaction box covering the signature of John Adams.

John Adams

for Deloitte LLP (trading as Drivers Jonas Deloitte)