

Winchester Heritage Centre

32 Upper Brook Street
Winchester
SO23 8DG
01962 851664
secretary@cityofwinchestertrust.co.uk

Chairman: Keith Leaman

The Programme Officer
C/o Winchester City Council
Strategic Planning
City Offices
Colebrook Street
Winchester
SDO23 9LJ



9 October 2012

Dear Mrs. Morton,

I wish to make a further statement to add to my submission on the Winchester District Local Plan Part 1 on behalf of the City of Winchester Trust on March 10, 2012.

My UID number is 3145 and the additional material relates to Policy CP3. As requested I enclose three paper copies and am e-mailing a further copy.

Please confirm that this has been received and conforms to the conditions in your letter of September 27th.

I would also like to request that the Trust be added to those invited to take part in the Examination in Public discussion on Monitoring and Implementation at the session commencing at 11am on November 8th so as to make the case for a separate policy on this matter to be added to the Plan.

Finally, please note that a long-standing commitment to present a paper to a Panel of Hampshire County Council means that I will be unable to be present at the EIP on the morning of November 1st until about 11.15. I am arranging for a colleague from the Trust to sit in on the discussion in my place until I arrive, and hope to be able to make my case (with the current addition on Policy PC3) then.

Yours sincerely,

Harvey Cole.

PRESIDENT
His Honour Judge Christopher Clark QC
VICE PRESIDENTS
The Lord Ashburton KG KCVO DL
Sir Donald W Insall CBE FSA RWA FRIBA FRTPI SPdip(Hons)



THE CITY OF WINCHESTER TRUST LTD
www.cityofwinchestertrust.co.uk
Registered in England No 609812
Registered Charity No 251798
Supported by Hampshire County Council
& Winchester City Council

Harvey Cole for the City of Winchester Trust

Addition to representations on Policy CP3, paragraphs 5.22 – 5.25

October 11 2012

1. My original representation drew attention to the provision for affordable housing within the Local Plan having an ambiguous relationship to the total of 11,000 dwellings proposed to meet the needs of the District until 2031.
2. The Council's response to consultation did not address this point in any detail, or comment on the addition to the policy which I suggested.
3. Since the consultation period ended in March, the Government has outlined proposals to give developers a right of appeal against conditions included in Section 106 agreements, in particular to release them from obligations to build a specific proportion of affordable homes within the total number authorised by specific planning permissions. There has been a clear indication that a presumption in favour of removing such conditions would operate, although details of any legislation have yet to appear.
4. This makes it necessary for the Council to set out its own attitude to affordable housing provision in the light of changing circumstances.
5. In particular, the current confusion as to how affordable housing is to be treated in the context of the 11,000 dwellings specified in Policy DS1. It is clear from the Housing Technical Paper of June 2011 that Scenario 1 (which forms the basis of the policy) makes no specific allowance for affordable homes, being derived from projections of population and migration trends, and changes in household headship rates. This is confirmed by Scenario 4, which was derived by assuming that existing and future requirements to eliminate affordable housing need was achieved over the plan period. While the figures used in this calculation are open to serious question, the methodology clearly assumed that affordable provision was **additional** to the Scenario 1 requirement of 11,000.
6. This can be seen from Table 7.1 of the Technical Paper which projected an annual need for 375 affordable units, giving rise to an additional provision of 7,760 homes (assuming affordable dwellings were to account for 40 per cent of the total) over 20 years.
7. As things stand, therefore, a theoretical developer with permission for 2,000 new homes and an agreement for 800 of these to be affordable, could contend that his scheme was contributing only 1,200 to the plan total of 11,000 – or, alternatively, appeal to the Secretary of State to remove the affordable housing obligation.
8. A plan with such an unresolved contradiction at its heart cannot be regarded as sound.