

Reference: 01964 – John Beveridge

Winchester District Local Plan Part 1 Joint Core Strategy

Further representation

This further representation relates to the submission made on 28 July 2012 ('the July submission') on the subject of windfall housing allowances with reference to the strategic allocation of housing at Barton Farm set out in Policy WT2. Since then the Secretary of State granted planning permission on 2nd October 2012 for development at Barton Farm. To the extent that the July submission refers to Barton Farm, it needs to be revised as set out below.

I contend that the calculations and the reasons for the higher windfall numbers set out in the July submission remain valid and are sound. I therefore propose that they should be adopted in place of those shown in the Housing Trajectory table shown in Appendix F (HT) of the Local Plan (LP) and that the existing windfall figures set out in the HT render the LP unsound (not justified) because they do not comply with the policies in the National Planning Policy Framework (NPPF) and in the LP. I summarise below the policies in the two documents which are ignored or not given sufficient weight:

1. The windfall figures in the HT do not comply with the NPPF policies, not only in respect of paragraph 48 concerning windfall allowances as set out in the July submission but also with reference to paragraphs 8, 17, 151, 156, 109 and 111. These cover: the importance of sustainable development; the reuse of brownfield land; and conserving and enhancing the natural environment, including landscape.
2. The relevant LP policies that are not observed are: DS1, WT1, CP14, CP20 and CP21. These cover: the need for development to make efficient use of land within existing settlements; aim to achieve higher densities in urban areas; prioritise the use of brownfield land in accessible locations; landscape and green settings (particularly relevant for Winchester Town) should be conserved and enhanced;

The unrealistically low numbers for windfall housing set out in the HT has the following potential harmful consequences which are contrary to one or more of the policies summarised above.

- a. If the number of houses are delayed on allocated sites or not delivered in accordance with the LP timetable or additional housing is required, there is a greater risk that greenfield sites for housing will be allocated or granted permission following a speculative application.
- b. Inadequate provision of infrastructure and community benefits within settlements could well result.

John Beveridge
10th October 2012