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Ms R Morton
Planning department
Winchester City Council
City Offices
Colebrook Street
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30 July 2012

Our ref: 157111F/AB

Dear Ms Morton

Updated comments to Pre-submission Local Plan Part 1 in relation to Whiteley Town Centre

We write on behalf of our client, Whiteley Co-ownership, to provide updated comments to our original representations to the Pre-submission Local Plan Part 1, submitted via email on 12 March 2012 (further copy attached). We welcome a number of proposed modifications, in particular the specific inclusion of Whiteley as a 'town centre' in the retail hierarchy under policy DS1. There are however, a number of additional comments that we feel are necessary to improve the robustness of the Local Plan Part 1.

The following comments relate to the proposed modifications of paragraph 2.7 of the Pre-submission Local Plan Part 1. The proposed modifications update the paragraph to reflect the Retail Update 2012 study that forms part of a suite of documents submitted for the examination of the Local Plan. The paragraph now states:

“there is expected to be a need for about 12,000sqm (net) of new retail (A1) floorspace across the District to 2031 mostly comparison floorspace, taking account of commitments at the time.”

Although we acknowledge that the Retail Update 2012 study is an evidence base document and therefore not consulted on or adopted, we feel that retail projections for the Local Plan period should take into account the major developments proposed within the Local Plan, including a minimum of 3,000 homes at North Whiteley and 3,000 homes at West of Waterlooville. Scenarios for the inclusion of these developments in the retail projections are included within the 2010 Retail and Town Centre uses study.

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Scenarios were explored in the 2010 Retail and Town Centre Uses study for the inclusion of Barton Farm, North Whiteley and West of Waterloooville within the retail projections. In terms of Whiteley Town Centre, these projections showed that the development of North Whiteley could increase the scope of comparison floorspace by 2,469sqm net up to 2021. As the Local Plan specifically aims to bring forward these major developments during the plan period (up until 2031), in reality retail growth over the Local Plan period will be greater than is currently acknowledged. Although we are happy that, at present, the Local Plan proposed policies are sufficiently flexible to allow for higher level of retail growth, we would like to emphasise that it is important to consider the retail scenario within the context of new major developments in order to allow retail centres, such as Whiteley Town Centre, the opportunity to respond to need and flourish.

In addition, it should be noted that the Retail Update 2012 study over-predicts the current level of comparison floorspace allowance at Whiteley Town Centre, stating an equivalent total of 26,821sqm gross comparison currently exists (including existing commitments), whereas in reality consent 11/03070/FUL has permitted a maximum of 25,672sqm gross. We feel that the 1,149 sqm of gross comparison floorspace over the currently consented total should be included as a floorspace projection for Whiteley Town Centre up to 2021. This will help ensure that Whiteley Town Centre is not unduly limited in any plans for future expansion, as and when it should occur.

We thank you for this opportunity to comment further and sincerely hope that you are able to acknowledge the above comments in the examination process of the Local Plan.

Yours sincerely



Adrian Barker
Technical Director

Enc. Representations made to per-submission Local Plan (12 March 2012)