

RESPONSE TO JOINT CORE STRATEGY (JCS) PROPOSED FURTHER MODIFICATIONS

1. We provide our response to Winchester's proposed further modification below. As the Inspector will be aware, we have made a number of representations prior to and throughout the examination regarding the Local Planning Authority's failure to undertake an objective and sound assessment of its housing needs and requirements and that the JCS evidence base and strategy for housing and employment must be integrated and take full account of relevant market and economic signals.
2. We do not wish to reiterate these points of soundness in this response to the proposed further modifications. However we do note with serious concern that the LPA does not propose modifications in relation to its housing provision despite the LPAs clear failure to justify the JCS development strategy and the options assessed through its Sustainability Appraisal.
3. Our response to the current consultation on WCC's proposed modifications is principally in relation to proposed modification number 2.3, 2.30 and 2.31 whereby the LPA proposes the introduction of planning for 15.7 hectares of employment land, 178,000sqm of floorspace and 23 hectares of land at West of Waterlooville.
4. NPPF paragraph 156 states that:

“Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

 - ***the homes and jobs needed in the area;***
5. It is clear that the NPPF requires LPAs to set out policies that deliver jobs needed in the area as well as a level of housing to support economic growth objectives. WCC's proposed modifications do not provide policies that will help deliver jobs, or a level of housing to support economic growth. Rather, they simply put forward 15.7 hectares of employment land in the hope that doing the bare minimum will allay the Inspector's concerns about the obvious omission of an employment strategy and NPPF compliant employment policies raised at the public hearings.
6. WCC has clearly not adequately considered or assessed any alternatives for accommodating the level of development needed to deliver the level of economic growth expected and planned for and there is insufficient evidence of working with its neighbours to ensure objectively assessed levels of need are appropriately planned for.
7. Paragraph 21 of the NPPF sets out the important role of Local Plans in helping remove barriers to investment and provide a clear economic vision and strategy for local areas. The table below demonstrates how the JCS fails each of these requirements even with the proposed modification in respect of employment policy CP8:

NPPF Paragraph 21. “In drawing up Local Plans, LPAs should:	WCC Joint Core Strategy
Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;	None provided
Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;	None provided

Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;	Policy CP8 states that the District will promote a low carbon economy and the emerging 'green collar' industries. What are 'green collar' industries? Is there evidence that these industries are likely to move to the area? Where is the spatial strategy for accommodating these sectors? The JCS does not allow for a rapid response / flexibility to changes in economic circumstances.
Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;	No indication for location of any industry in the JCS.
Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement.	No priority areas identified for economic regeneration.

8. Although we commend the LPA for proposing an employment target of some description (15.7 hectares), we do not consider its proposed modifications to go far enough to comply with the NPPF nor does the LPA provide sufficiently credible or clear evidence on which to inform these policy changes. Furthermore, the proposed modifications in question result in an extremely confusing policy that does not provide developers, investors and other businesses with a clear vision or direction in terms of 'where' employment land will be released or 'when' the LPA intends to release such land for development. NPPF paragraph 154 clearly sets out that local plans should address the **spatial** implications of economic, social and environmental change and that **local plans should set out the opportunities for development and clear policies on what will or will not be permitted and where**. The JCS simply fails to do this.
9. NPPF paragraph 154 provides clear guidance on what the role of Local Plan policies are by stating that:
- “Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.”***
10. The proposed modification (2.31) does not provide a clear indication of how a decision maker should react to an economic development / employment proposal. The policy simply provides a policy hook for allocating employment land in Local Plan Part 2 and then goes on to state that “at least 15.7 hectares of new employment land will be provided across the District to provide for expected economic growth to meet future employment needs...”. How can a decision be made against this policy? Why 15.7 hectares? Where will the 15.7 be delivered? What are the anticipated economic / employment needs of the District? These are all mysteries which the LPA insists will be solved through the Local Plan Part 2.
11. However, **the matter of economic growth and employment land should not be an afterthought to be lightly addressed through a lower level DPD, it is instead a matter that should be placed firmly at the centre of the Plan’s objectives, policies and aspirations for the local area, particularly at a time when competition for jobs and investment is so fierce.**
12. To confuse matters further, the LPA proposed modification 2.30 states that “At least 15.7 hectares of employment land will be needed” followed by “The Council is committed to providing about 178,000 sqm of floorspace to contribute towards the needs of the PUSH area with the new floorspace being

provided through a mixture of allocated sites (including 23 hectares of land at West of Waterlooville)". The extent to which these proposed figures for PUSH are in addition to 15.7 hectares of employment land, is very unclear. If the LPA is proposing that the PUSH numbers are included in the overall numbers for the District, it does not square that they intend to release 23 hectares of land at West of Waterlooville but are only making provision for 15.7 hectares of land across the whole District. This confusion is indicative of WCC's failure to develop a clear economic strategy to guide future economic growth in the District and demonstrates that economic development is an afterthought for the LPA.

13. The market viewpoint of this policy would likely be as follows: Winchester CC is 'quarantining' its employment (and housing) land requirements in South Hampshire in order to preserve the remainder of the District from development, despite there being a clear demand for employment and housing in Winchester Town. Therefore, if a developer or investor wishes to pursue an economic development opportunity, say tomorrow, he / she will have to fit into the proposals at West of Waterlooville as the LPA has not provided any other spatial options for consideration and investment. The other option would be for him / her to wait for WCC's Local Plan Part 2 to be unveiled however by then it will most likely be too late and he / she will have moved on to another area which is genuinely planning for and embracing growth.
14. The JCS is unable to address the spatial implications in respect of economic change as it does not provide a clear analysis or strategy for economic change in the District. We acknowledged that economic change is not always predictable, however the key role of plan-making and the plan-led system is to help plan for future economic, social and environmental needs and changes through the release and protection of land using a robust and credible evidence base.
15. The LPA will undoubtedly respond to the issues raised in our response by saying that they will address the 'where' and 'when' of delivering economic growth in its Local Plan Part 2 however it does not appear that the LPA has clearly justified the reason for undertaking a 'Part 2' to the Local Plan in accordance with NPPF paragraph 153. Surely at a time when Government is increasing funding to local communities and business leaders including LEPs, WCC should be providing the clear policies for economic growth and development that provide some spatial certainty particularly for an area as economically robust as Winchester District. Waiting for a lower level DPD to determine this critical aspect of the Plan demonstrates to LPA's reluctance to positively plan for the District's future in its key Development Plan Document.
16. Finally, the LPA's failure to set out a clear economic strategy based on clear evidence base for the District is a critical soundness issue highlighted by PINS back in April 2012 as something that the LPA needed to address prior to submitting the Plan to the Secretary of State. The PINS advice states that the LPA should:
 - 1) Produce a background paper to clarify amount/type of employment land and the strategy for its delivery.
 - 2) Re-assess details of policies CP8 and CP9 to refer to retention of existing and allocated sites and the need for flexibility
 - 3) Refer in key strategic policies to the amount of employment and growth planned for - how this will be expected to be delivered to ensure that this is meeting the needs of the area.
17. Despite this clear advice from PINS and the evidence Barton Willmore submitted as part of our representations and the case that we made at the public hearings WCC has resisted the requirement to set out how employment will be delivered to meet the needs of the area and has also resisted producing a background paper clarifying the amount/type of employment land and where it will be delivered. The background paper submitted by the LPA is as ambiguous as the proposed employment policy itself.

18. In order to make Policy CP8 sound, it needs to set out the floorspace, **jobs** and land requirements for Winchester Town, the market towns and rural areas and the area within South Hampshire and base this on clear and robust evidence. The policy should then specify the employment allocations and a trajectory for its delivery over the plan period with intended delivery sites clearly set out, just as the housing supply is set out. We do not consider it possible at this stage to suggest an alternative policy wording as the required evidence has not been provided by the LPA as set out above.
19. It is recognised that the jobs requirement will then result in the provision of significant levels of additional land for housing to meet the level of jobs planned for, to which we would refer to our previous submissions and representations. However, this is considered to be the only way in which the plan can be made sound and in accordance with the requirements of the NPPF.