

Local Plan Part 2: Statement by Keith Barrett

I believe that Winchester City Council's Local Plan Part 2 is unsound in the following areas:

Policy NA2

This policy is not justified, is not effective and it is not consistent with national policy.

It fails these tests on the following grounds:

This policy is **not justified** because the site selection process has been opaque and a number of these site allocations have not been tested for viability. The City Council have failed to explain why they have allocated a number of non-SHLAA sites at this location for development, without having given consideration to reasonable alternatives.

This policy is **not effective** because the sites are in disparate ownership. It's likely, as a result, that the City Council's proposed policy would lead to the loss of employment land at this location. It is also doubtful that additional public car parking could emerge at this location, given the financial advantages associated with developing for residential use only.

It is **not consistent with national policy** or with Local Plan Part 1 (LPP1) in respect of protecting employment land and ensuring the vitality of the town centre.

The document could be made sound by:

- Being supported by a Sustainability Appraisal that includes a consideration of all reasonable alternatives
- Being supported by a site selection methodology that includes consideration of all reasonable alternatives
- Specifically allocating land at The Dean for employment purposes

The precise change that is sought is:

Policy NA2 should be re-worded to specifically state that land at The Dean should be allocated to allow for the refurbishment/renovation of existing employment land as office space.

If a car park is required at this location, then a definitive allocation for that purpose should be made.

Policy NA3

This policy is not justified, is not effective and it is not consistent with national policy.

It fails these tests on the following grounds:

The policy is **not justified** because the site selection process has been opaque. In particular, the whole of site 277 has been treated as a single entity, with no consideration given to the poor relationship between the southern part of the site and the existing town centre.

It is **not justified** because there is no evidence that a sequential test has been carried out prior to allocating an edge of town location for office use. Neither has the City Council brought forward any evidence to suggest that a decline in service sector employment is to be expected in New Alresford, or of any projected increase in manufacturing employment.

The policy is **not effective** because it relies on the provision of a new A31 junction. The provision of such a junction depends heavily upon the judgement of Hampshire County Council (HCC), acting as the highways authority. The failure to seek agreement in principle at this stage of the process jeopardises the delivery of all elements of development at the Sun Lane site. Given that HCC have previously raised concerns with regard to any significant increase in traffic flows on surrounding residential roads, there is considerable doubt about whether a new junction could be delivered that meets the requirements of the highways authority.

The document could be made sound by:

- Being supported by a Sustainability Appraisal and Site Assessment document that recognises that the site covers a large area, rather than seeking to characterise the southern end of the site (which is some distance from the town centre and from public transport access points) in the same way as the northern part of the site
- Giving due consideration to the Landscape Sensitivity Appraisal
- Removing the requirement that a new A31 junction should be constructed, given that the inclusion of such a junction is not justified by the available evidence base
- Removing the employment land allocation and instead focusing on the provision of office space in a central location, in order to support the local economy

The precise change that is sought:

Mention of a new A31 junction should be removed from this policy.

Mention of a new employment zone should be removed from this policy.

The housing allocation should be reduced, taking into account the landscape sensitivity within the centre of the site and within the NE corner of the site.

Consideration should be given to the provision of a secondary access point via the Bishops Sutton Road.

An additional residential allocation should be included at site 2552, in order to allow for a reduced allocation at site 277.