

Issue 1 – Strategy / Vision / Sustainability – Policy DS1

Personal ID No: 30115

Adrian Barker for Terence O'Rourke Ltd on behalf of the Whiteley Co-Ownership

ISSUE 1 STRATEGY/VISION / SUSTAINABILITY – POLICY DS1

i) Does the Joint Core Strategy [JCS] provide an appropriate spatial vision for the district over the plan period, consistent with national guidance in the NPPF and/or justified by clear and robust evidence and, if not, what is the best alternative and why?

- 1.1 The Whiteley Co-Ownership support applying a town centre first approach to retail development. This approach is consistent with the sequential approach to retail growth outlined in the NPPF.
- 1.2 The Whiteley Co-Ownership support the acknowledgement that the retail sector is likely to grow in the South Hampshire Urban Area during the plan period and welcomes the identification of Whiteley Town Centre as a town centre. This recognition of Whiteley Town Centre as a town centre is supported by evidence.
- 1.3 The redevelopment of Whiteley Town Centre commenced in July 2011, having achieved planning permission on 1 February 2011, (application reference 10/02481/FUL). The delivery of the permission for a new district centre comprising 25,672 sqm of retail and other town centre uses will increase the mix of uses, including non-retail services to create a more traditional town centre at Whiteley. The town centre will open in May 2013.

ii) Has the JCS been the subject of suitably comprehensive and satisfactory sustainability appraisal [SA], strategic environmental assessment [SEA] and an appropriate assessment [AA] and if not, what else needs to be done?

No comment

iii) Will the strategy satisfactorily and sustainability deliver the new development needed to meet the objectives over the plan period and, if not, why not and what needs to be changed?

- 1.4 Possibly. The Whiteley Co-Ownership is concerned that retail floorspace provision may have been underestimated and there is insufficient acknowledgement in the core strategy of the role of retail in delivering sustainable economic growth and specifically the role of Whiteley Town Centre in meeting the district's current and future retail needs.
- 1.5 Refer to our further statements made under Issue 2 (Policy CP8), Issue 3 (Policy SH1) and Issue 6 (Policy SH3)

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iv) Are any objectives, policies or proposals inconsistent with national guidance and, if so, is there a local justification supported by robust and credible evidence?

- 1.6 We are concerned that the evidence base informing the retail floorspace figures is not sufficiently robust and all appropriate evidence has not been fully taken account of within the JCS.
- 1.7 Retail projections within the core strategy are informed by the 2012 retail update (Retail and Town Centre Uses Study, NLP 2012), which suggests there is a need for about 12,000 sqm (net) of new A1 floorspace across the district to 2031, mostly comparison floorspace, taking account of completions. This compares to a figure of 36,524 sqm of new retail (A1) across the district to 2026 as proposed by the Retail & Town Centre Uses Study (NLP 2010).
- 1.8 We object to these floorspace projections on the basis that they do not take into account the additional retail demand that will be generated by the strategic housing allocations at North Whiteley and West of Waterloooville, nor the Fareham SDA. There is also concern that the 2012 projections are too heavily recession weighted, and do not take a sufficiently positive approach to growth. Floorspace projections are therefore too low, inconsistent with the NPPF's aspirations for growth and positive planning and not supported by a robust evidence base.
- 1.9 Specifically with regards to North Whiteley it is also important to note that the minimum growth in this location will be 3,000 dwellings, which would equate to 6,900 people (2.3 multiplier). However this could increase to 8,050 if 3,500 units are built, which will increase the scope and requirement for retail floorspace still further.
- 1.10 It is therefore anticipated that further retail provision will be required at Whiteley Town Centre to meet future need arising during the plan period, including from the development at North Whiteley. The retail figures should therefore be revised upwards, allowing Whiteley Town Centre to fully fulfill its role as a town centre, providing a broad range of town centre uses that compliment the development of North Whiteley. Alternatively we would suggest that the Inspector recommends an early review of retail floorspace projections to be completed by 2021, (the mid point in the plan period).
- 1.11 See further comment under statement to Issue 2 (Policy CP8).

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- v) **Is there clear evidence demonstrating how and why the preferred strategy was selected, including in terms of appropriate consultation with the public, representative bodies, neighbouring authorities, service and infrastructure providers and other interested parties?**

No comment