

## **Issue 2 – Economy/Employment/Retail – Policies CP8, CP9 & WT3**

Personal ID No: 30115

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

### **ISSUE 2 ECONOMY /EMPLOYMENT / RETAIL – POLICIES CP8, CP9 & WT3**

#### **RETAIL – Policy CP8**

**v) Does the JCS plan appropriately for the management and growth of retail centres over the plan period, focusing on higher level centres to provide a strategic framework?**

- 1.1 The Whiteley Co-Ownership support the approach at paragraph 2 of Policy CP8 to ensuring that there is an adequate supply of land and premises for new retail development. Planning for sustainable economic growth is a key theme that runs throughout the NPPF and a strategy that embraces these principles and focuses retail growth on high level centres, as supported by the NPPF, is welcomed.
- 1.2 However, there is concern that the plan does not appropriately plan for the management and future growth of Whiteley Town Centre. The JCS provides only very limited guidance and policy detail on retail matters in the district, especially for the South Hampshire Urban Areas and in relation to Whiteley Town Centre. The JCS text and polices should be expanded to recognize the significant role of retail in delivering economic growth, particularly at Whiteley. We also object to the proposed floorspace figures within the core strategy evidence base (Retail and Town Centre Uses Study, NLP 2012). These figures, revised from the 2010 report, are too low and do not allow for the future sustainable growth of Whiteley Town Centre, they also do not reflect local need arising over the plan period from the strategic housing sites.
- 1.3 Retail growth can help deliver sustainable economic growth in accordance with the government's growth agenda. The redevelopment of Whiteley Town Centre to create a new town centre represents an investment of over £100 million in the local area. It will result in significant employment generation and make Whiteley a better place to live and work. The delivery of a wider range of retailing opportunities - better suited to the needs of those living and working at Whiteley, together with new community uses, flexible business space and infrastructure improvements will deliver wide ranging economic, social and environmental benefits, including significant diverse local employment opportunities.
- 1.4 We note that paragraph 23 of the NPPF requires LPAs to define the extent of the town centre and primary shopping areas, based on a clear definition of primary and secondary frontages in designated areas. It also requires LPAs to produce clear policies with respect to permitted uses and to allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. This is expanded upon at Paragraph 161. We understand that this detail will be brought forward

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within the Local Plan Part 2 – Development Management & allocations DPD, however for strategic sites (town centres) it would seem appropriate that suitable sites and floorspace are located within the JCS.

1.5 The extent of town centre boundaries, the identification of primary shopping frontages and the allocation of sites, should be developed in full consultation with relevant stakeholders, including the Whiteley Co-ownership, and be supported by robust evidence. It is essential that this work is not delayed to enable the appropriate management and future growth of Whiteley town centre, and avoid uncertainty in the future which may subsequently impact the economic prosperity of the new town centre.

1.6 We understand also that the Local Plan Part 2 DPD will also provide the forum for allocating sites for A2 – A5 uses. It is implicit in the evidence base and JCS that the retail floorspace projections within the JCS only refer to A1 uses.

**vi) Is the presumption of “town centres first” consistent with national policy in the NPPF and/or justified by clear and robust evidence and appropriate in the local context?**

1.7 The commitment to new investment in main town centre uses being directed into town and district centres, fits comfortably with the NPPF (paragraph 23) which requires that planning policies should promote competitive town centre environments and set out policies for the management and growth of centres over the plan period; also that “*..local planning authorities should recognise town centres as the heart of their communities and pursue policies for the management and growth of centres over the plan period.*”

1.8 However the Whiteley Co-Ownership is concerned that the JCS, with respect to retail growth, does not provide a basis for positive planning as required by paragraph 23 of the NPPF. Instead of planning for sustainable economic growth, the revised retail floorspace figures, as derived from the NLP Retail and Town Uses Study 2012, are recession led and considered too low and do not take in to account the major developments proposed within the plan. See further comments under statement submissions to Issue 1 Q4, Issue 2 Q5 and Q7 and Issue 6.

**vii) Should the JCS indicate suitable and appropriate floorspace levels for the scale of new retail development in centres over the plan period?**

1.9 Yes. Paragraph 161 of the NPPF states that Local Planning Authorities should use their evidence base to assess: the need for land or floorspace for economic development, including both qualitative and quantitative needs for all foreseeable types of economic activity over the plan period, including retail and leisure

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development and the capacity of existing centres to accommodate new development.

- 1.10 It is therefore appropriate that the JCS indicates (on a strategic basis) suitable floorspace levels for the scale of new retail and leisure development proposed in town centres over the plan period, rather than delay to the subsequent Local Plan Part 2 Development Management and Allocations DPD.
- 1.11 We note the proposed modifications to paragraph 2.7 of the Pre-submission Local Plan Part 1, which updates the paragraph to reflect the Retail and Town Uses Study (NLP, 2012). Paragraph 2.7 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.”* This is a significant reduction in floorspace from the 2010 Retail and Town Centre Uses Study that proposed 36,524 sqm across the district to 2026. We object to these revised figures, which are recession led and do not take a sufficiently positive approach to growth.
- 1.12 As we have noted previously these studies do not take into account the major developments proposed within the Local Plan, within its population projections, including a minimum of 3,000 homes at North Whiteley and 3,000 homes at West of Waterlooville. Scenarios were explored in the 2010 Retail and Town Centre Uses study for the inclusion of Barton Farm, North Whiteley and West of Waterlooville 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. However these additional projections were omitted from the final floorspace figures. The 2012 study did not explore these development scenarios at all.
- 1.13 As the Local Plan specifically aims to bring forward the strategic allocations at North Whiteley and West of Waterlooville during the plan period (up until 2031), in reality retail growth over the Local Plan period will be greater than is currently acknowledged. We therefore suggest retail projections are increased or alternatively the Inspector recommends an early review of retail floorspace projections to be completed by 2021, (mid point in the plan period).
- 1.14 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.
- 1.15 The Whiteley Co-Ownership acknowledge that the proposed policies within the Local Plan are sufficiently flexible to allow for a higher level of retail growth. However we emphasise the importance of considering the retail scenario within

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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. It is therefore suggested that the JCS places greater recognition on the significant role of Whiteley Town Centre in meeting the districts retail needs and delivering sustainable economic growth.

1.16 In addition, we note 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 at a minimum 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 begin to help ensure that Whiteley Town Centre is not unduly limited in any plans for future expansion, as and when it should occur.

### **viii) Should the JCS seek to proactively manage and/or improve the evening/night time and/or the tourism economy in the various centres/ locations?**

1.17 Tourism and leisure generates significant revenues, jobs and supports communities through enhancing local services and facilities. Tourism can also support a broader and more vibrant and active community and underpin the quality of the local environment. Equally the nighttime economy makes an important and vital contribution to the economy of the district. A range of activity in a city or town increases viability and vitality and can contribute to the creation of inclusive, safe communities. The nighttime economy creates jobs, attracts people to an area and brings money in. The redevelopment of Whiteley Town Centre can help expand the tourist and evening economy offer within the district, delivering activity, interest and safer environments whilst promoting economic growth.

1.18 The night-time economy is often associated with many negative factors however these can be addressed by good design to design out crime and effective public transport strategies to provide more inclusive places for people to meet and socialise. In the case of Whiteley Town Centre, the consented development will enable a once gated retail only development to be transformed into an inclusive safe mixed use environment, creating activity and interest, whilst delivering public access, improving connectivity and improved access to public transport.

1.19 The tourism, leisure and night time economy is important to Winchester district, therefore it may be appropriate for the core strategy to provide appropriate strategic guidance / an overarching strategy to manage and improve the tourism and night time economy in town centre locations, such as Whiteley Town Centre.