

STRATEGY/VISION/SUSTAINABILITY - Policy DS1

Session/Issue 1:

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?

1. We do not consider there to be clear evidence demonstrating how and why the preferred strategy was selected. Despite the fact that the bulk of the evidence supporting the JCS is concerned with arriving at an acceptable housing number for the District rather than an overall spatial development strategy for the District, the development scenario chosen by the LPA was chosen as it has an average annual requirement approximately 10% lower than the South East Plan and which seemed realistic to the LPA in terms of the changed economic climate¹. However, the NPPF does require plans to be realistic as well as aspirational whilst plans must also be based on objectively assessed and credible evidence, not simply based on what the LPA considers to be acceptable. Basing the development strategy on a scenario that the LPA considers to 'seem realistic' does not provide a sufficiently clear explanation for why this scenario was chosen.
2. **Furthermore, the evidence submitted does not demonstrate, as required by the NPPF², that the LPA has worked with neighbouring authorities where the housing market areas cross administrative boundaries.**
3. Whilst the Duty to Cooperate document (June 2012) sets out how the Council considers it has complied with its duty to work with neighbouring authorities in its plan making, **the document fails to make clear how cooperation was achieved with neighbouring authorities on cross-boundary issues or how issues raised through consultation have been resolved or not resolved.** The document focuses on the Council's relationship between other bodies rather how they have worked together to in developing the plan and addressing cross boundaries matters.
4. We note that Fareham Borough Council objected to the Pre-Submission JCS on the grounds that Winchester City Council had not shown due regard to their Duty to Cooperate in the planning of the North Whiteley strategic allocation. Particular emphasis was placed upon the timing and location of both the education provision and transport provision. The Fareham BC representation explains that previous consultation comments made by the Fareham's Council's Executive and by a representative at the North Whiteley Development Forum meetings, have not been taken onboard by Winchester CC. Fareham's concerns, with regards to this topic, have not been resolved and were raised again during the Consultation on the Proposed Modifications to the document.
5. Eastleigh Borough Council raised similar concerns over the impact of the Whiteley development upon the transport network.
6. Havant Borough Council objected on a number of issues including the housing requirement of 11,000 new homes. They note that they would expect reduced housing requirement to be based on a robust credible evidence base and raise concern over how unmet development needs will be dealt with.

¹ Background Paper 1- Paragraph 3.20

² Paragraph 159

7. In addition to the consultation exercises detailed above, Winchester City Council lodged an objection to Basingstoke and Deane Borough Council's Pre-Submission Core Strategy. The objection was on the grounds of the soundness and legal compliance of the document. Winchester City Council raised concern over the fact that Basingstoke and Deane had failed to provide for in-migration in its assessment of housing need and, as such, is not planning to provide for housing need that could be met within the authority area.
8. Whilst Basingstoke and Deane have had their Pre-submission Core Strategy quashed by a Judicial Review and will be reconsidering their allocated sites and locations for development, **there is no evidence that this issue has been resolved in partnership with Winchester City Council. Furthermore there is no submitted evidence that demonstrates joint working in North Hampshire between Winchester CC, Basingstoke and Deane and Test Valley Borough Council.**
9. There is no evidence how any of the above issues have been resolved through cross-boundary working. The duty to cooperate is not something to be taken lightly and is something which is critical and the very fact that WCC has received such damning objections from its neighbours and has objected to neighbouring plans, places a very clear conclusion that the JCS does not comply with the statutory plan making requirements in the duty to cooperate, rendering the plan flawed and unsound.
10. Furthermore, there is a lack of transparency, clarity and certainty regarding how Winchester CC worked with PUSH and the other South Hampshire authorities to arrive at the development figures in the South Hampshire Strategy as explained in our response to Question 1 iv, the development figures appear to not be based on clear and robust evidence base. The South Hampshire Strategy explains that by producing this document together, the local authorities have discharged their 'duty to cooperate' as set out in the NPPF. However, this is not necessarily the case as it is unclear how the local authorities are cooperating given that they are delivering lower housing numbers than what is set out in the South East Plan. There is no evidence of how unmet housing requirements are being achieved through joint working with neighbouring local authorities including through the PUSH South Hampshire Strategy process.