

ECONOMY/EMPLOYMENT/RETAIL - Policies CP8, CP9 and WT3

Session/Issue 2:

iii) **Should the policies be more specific in relation to the amounts and locations of new employment provision to be sought over the plan period?**

1. NPPF paragraph 156 requires that LPAs set out the strategic priorities for the area and including strategic policies to deliver jobs needed in the area. Policy CP8 fails to set out the jobs needed in the area and how these are apportioned across the District's three policy areas: Winchester Town, Rural Areas / Market Towns and PUSH. The approach taken by the LPA is in conflict with its own statement at the beginning of the Plan where it commits to identifying the amount of development in the District and where the growth will be delivered (paragraph 1.4)
2. The LPA did set out, in supporting text, a figure of 8,750 jobs in its Pre-Submission draft of the JCS however the LPA has proposed that this be deleted despite PINS advice¹ to refer in key strategic policies to the amount of employment growth planned and how this will be delivered. Paragraph 6.10 of the Submission JCS refers to a jobs number of 9,270 between 2009 – 2031. By merely including a jobs / floorspace number in the supporting text, the LPA is not being sufficiently clear about the amount of jobs / floorspace it intends to deliver over the plan period.
3. Equally, the JCS is not being clear about where specifically this growth will be delivered. The area based and allocation policies fail to clearly set out their respective roles in developing the economy in any specific detail. For example, SH1 explains that the West of Waterlooville allocation will have associated employment and that commercial floorspace provision will be made at Whiteley, Segensworth which will contribute to the PUSH economic strategy but no further detail is provided.
4. We do not consider it possible to make the document sound by amending the text of the document and as explained in our response to Question 1 iv and Question 2i, **the LPA's economic / employment evidence is not up-to-date, not robust and not clear**. The evidence must be updated prior to policy changes being proposed by the LPA. The only solution is for the Plan to be found unsound and the Plan re-repaired properly, taking into account the full extent of the NPPF by accepting the objectively assessed development needs of the District through integrated housing and employment evidence and setting out these requirements and locations for delivery clearly in the Plan.

¹ Advisory Meeting with PINS (June 2012)