Winchester District Local Plan Part 1 – Joint Core Strategy Further Proposed Modifications (12 November 2012)

- i. Modification 2.3 (page 29, paragraph 3.1), 2.30 (page 94, paragraph 6.14), 2.31 (page 95, policy CP8)
- 1. Policy CP8 has been modified to say that at least 15.7 hectares of new employment land will be provided across the District to provide for expected economic growth and meet future employment needs (Modification 2.31, Policy CP8). Modification 2.30 explains that the Council is committed to providing about 178,000 sqm of floorspace to contribute towards the needs of the PUSH area, with the new floorspace being provided through a mixture of allocated sites (including 23 hectares of land at West of Waterlooville) and existing planning permissions. It is not clear if the floorspace for the PUSH area is in addition to the 15.7 hectares of employment land identified in Policy CP8 for the plan period. The text should be amended to make this clear.
- 2. Whilst Bovis Homes and Heron Land Developments welcome the inclusion of an employment floorspace requirement in Policy CP8, the figure of 15.7ha of land is insufficient to meet the identified need during the plan period, particularly if this requirement can be met in total at West of Waterlooville. The Policy should be modified to include specific employment floorspace requirements for each of the spatial areas which can be properly planned for and monitored.
- 3. Table 7-1 of the SQW Economic and Employment Land Study Final Report (page 64) identifies that between 2006-2026 20.9ha of employment land is required in Winchester Town, which represents approximately 25% of the total employment land (84.4ha). The 2011 DTZ report (Review of Employment Prospects, Employment Land and Demographic Projections) significantly downgraded the employment projections as a result of employment projections produced by Oxford Economic Forecasting for 2009 onwards, which are 25% lower than those included in the ELR (2007).
- 4. Bovis Homes and Heron Land Developments do not accept that the conclusions of the 2007 study should be disregarded based on the recent downturn in the economy. The Local Plan Part 1 will cover the period to 2031 during which time there is likely to be a number of economic cycles. The need to address the significant imbalance in employment and the high levels of commuting in and out of the city are issues that should be addressed in the Local Plan Part 1 through a properly planned allocation. In order to attract high-end knowledge based industries to Winchester sufficient floorspace in Winchester City is required to meet this need.

Proposed change:

5. Modification 2.31 (policy CP8) should be further modified to include a specific employment allocation for each of the three spatial areas. The requirement for

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Winchester Town should be at least 20ha of employment floorspace. This would allow for redevelopment of existing employment sites as well as providing an opportunity to restructure the town's economy through a purpose built employment allocation in the form of a knowledge park or similar.

6. Modification 2.30 should be amended to explain the status of the floorspace requirement for the PUSH area, i.e whether the 178,000 sqm of floorspace to contribute towards the needs of the PUSH area, with the new floorspace being provided through a mixture of allocated sites (including 23 hectares of land at West of Waterlooville) and existing planning permissions is in addition to floorspace allocation for the plan period.

ii. Modification 2.4 (page 29, policy DS1) and 2.7 (page 40/41, policy WT1)

'Winchester Town will make provision for <u>about</u> 4,000 new homes...' (Modification 2.4, Policy DS1)

'The spatial vision for Winchester Town will be achieved through: - provision of about 4000 new homes (2011-2031)...' (Modification 2.7, Policy WT1)

- 7. The modification to policy DS1 and WT1 to include 'about' 4000 dwellings is too vague. 'About' could be interpreted to mean 'almost', which will result in uncertainty over housing provision and ultimately could result in the under delivery of housing. Instead the housing requirement should be qualified with the words 'at least'.
- 8. Bovis and Heron are concerned that the evidence supporting the SHLAA figure in Local Plan Part 1 has not been made available for scrutiny as part of the examination process. As the Council has relied upon this evidence to demonstrate the residual housing requirement, it should have been available. Without this detailed evidence, it has not been possible to properly test the robustness of the housing strategy.
- 9. Bearing in mind the objections raised previously to the inadequacy of the housing requirement for Winchester Town and the lack of transparency in the identification of the residual housing requirement, it is essential that housing delivery is not further compromised by the inclusion of proposed modification 2.4.

Proposed change:

10. Modification 2.4 and 2.7 should be amended to include 'at least' rather than 'about' 4,000 houses.

iii. Modification 2.23 (page 76, paragraph 5.9) and Modification 2.45 (page 189, Appendix F)

11. Bovis and Heron are concerned that the evidence supporting the SHLAA figure (grouped together with sites with planning permission in the table) has not been

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made available for scrutiny as part of the examination process. As the Council has relied upon this evidence to determine the residual housing requirement, it should have been made available to allow the robustness of the housing strategy to be tested. In the same context, Bovis and Heron cannot comment on the housing trajectory.

iv. Modification 2.43 (page 122, paragraph 8.5)

12. Bovis and Heron are pleased to see some recognition of the need to monitor housing delivery in each of the spatial areas however they object to the wording proposed by the Council in modification 2.43. Merely 'checking' the situation in each of the spatial areas is inadequate, as it does not give any confidence that any shortfall will be addressed. The Plan should clarify the procedures for monitoring and managing housing delivery in each of the spatial areas and progress should be reported in the Annual Monitoring Report.

Proposed change:

13. Modification 2.43 should be amended to state that the Council will monitor, record and report on the 5 year supply of housing land not only at a district level, but also in each of the three spatial areas.

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