

Statement in relation to Inspector's Issues and Questions

Solent Planning Ltd on behalf of Reedrent Ltd

Unique Reference Number: 51489

20 June 2016

(1) Introduction

This statement has been prepared on behalf of Reedrent Ltd in response to the Inspector's list of 'Issues and Questions' and further to the original representations submitted in December 2015.

(2) Winchester Town – Policies WIN1-4

Matter 14:

i) Are the policies and proposals for growth and change in this area appropriate and justified, including in relation to the NPPF/PPG, and in terms of environmental, economic and social impacts?

Our clients concern is that Winnall was not included in the first stage consideration of housing sites within the preparation for the Local Plan Part 2. The subsequent planning framework has not assessed the potential of this area for housing, or taken into account redevelopment opportunities and the potential of developer led redevelopment to provide the solutions sought for the Winnall area; social, economic and environmental. On this basis alone the plan is not sound.

Para 5.1 of the National Planning Policy Framework (NPPF) confirms that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in the Framework, including the presumption in favour of sustainable development. Para 5.2 continues to state that local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three.

Paragraph 17 setting out the core planning principles includes reference that every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth, encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value and actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

Paragraph 22 confirms that land allocations should be regularly reviewed.

A reference to the Winnall Framework was first noticed on the Council's website in May 2015. However, our client had not been consulted on this (even though the owner and an occupier of the Cavendish Centre in Winnall) and Solent Planning was not consulted on it even though we had submitted representations to the draft plan in December 2014 calling for the inclusion of Winnall within the Part 2 Local Plan assessment of sites.

Solent Planning therefore contacted Nigel Green (Planning Policy Officer) on behalf of our client seeking confirmation on the content and approach of the 'framework' document. He confirmed that the Framework was being led by Economic Development with planning input where required. He further advised that when consultants were involved on frameworks for Stanmore and Abbots Barton they were specifically asked to look at potential sites and make recommendations on them. He advised that with Winnall, the Council felt they had enough sites to meet housing need and did not ask the consultants to identify sites, consider redevelopment or consider changes of use.

As such, the assessment of allocations for sites within Winchester Town is not consistent with national policy, as this is a potential key area of sustainable housing development within the settlement boundary and adjacent to the town centre which has not been taken into consideration by the Council.

The Local Plan Part 2 cannot be considered justified and hence sound as without the evidence base on which to assess Winnall, (particularly in terms of mixed or residential development) it cannot be assessed if the Council's strategy is the most appropriate when considered against the reasonable alternatives (i.e. locations within Winchester), based on proportionate evidence.