

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 WIN5-11

Matter 15:

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 client's objection focuses on the local planning authority's specific failure to undertake a comprehensive review of planning issues and potential in Winnall and particularly the employment area. The proposed zones offer little change and flexibility from the existing uses and really add nothing to the future use of the area. The policy wording is vague as the evidence base on key planning issues is not in place.

We note that the specification document provided by the Council in requesting tenders for the preparation of the Winnall Planning Framework in 2014 acknowledges *"The edges of the Winnall neighbourhood offer most potential for new housing, potentially funding infrastructure improvements within the neighbourhood. This in turn might prompt a policy issue to be resolved around future designation of these areas for housing or business use."*

Later it acknowledges that a review of Winnall is needed because *"The issues could be further complicated with the recent government announcements on relaxing the planning requirements for changing the use of certain employment uses to residential"*.

These are key planning issues with social, economic and environmental impacts and although these issues are acknowledged by the Council, they have not been reflected in either the work in gathering information for the evidence base, or the drafting of Policy WIN11 for Winnall.

There has been an underlying assumption that the employment area, which is already diversifying to other uses including retail and residential gives recent permissions and change of use under Permitted Development rights, will remain in this use.

A new review of Winnall, taking into account the issues acknowledged in the tender specification above and our client's objections to date is needed to make the Plan sound.

ii) Are they clear and deliverable, including in respect of the associated infrastructure requirements?

The zones on Policy Map 26 are vague and do not really offer any flexibility above the existing position and as such we do not see the benefit of them. It is our clients view that the policy wording is vague, because there has not been sufficient assessment of the key planning issues affecting the area on which to establish clear policies and there is no sound evidence base.

Further to our client's original representations, we note that a report on the Winnall Framework was taken to the Council's Cabinet on 29 March 2016 which adds further to concerns for deliverability of the framework which has been the basis for Policy WIN11.

Paragraph 1.4 states that *"The Framework was produced by consultants Parsons Brinckerhoff on the Council's behalf, and includes many suggestions for developments in the Winnall neighbourhood. Although these are all considered to be helpful and interesting suggestions, it is important for the Council to manage expectation by being clear about the actions which it is prepared and able to deliver in the coming years."*

Further paragraph 7.1 confirms that *"There has been a high level of interest in the Winnall Planning Framework from both the business community and the residents. The aim of this Report is to manage expectations about the capacity of the Council to deliver the actions proposed by Parsons Brinckerhoff, and so to avoid the risk of reputational damage. It is important that the Council is seen to deliver some 'quick wins' following this Report to maintain the confidence of the many individuals and businesses in Winnall who have contributed to its development."*

It is our client's opinion that the Plan can only be considered sound when a fresh and detailed review of the planning issues affecting Winnall has been considered. Further to this, a policy should be developed which provides for further flexibility to enable residential and other appropriate mixed use development in this highly sustainable brownfield location within Winchester.