



For office use only
Date <u>19.9.14</u>
Ref No. <u>REP 23/3</u>

Gosport Local Plan 2011-2029 Publication Version Response Form

Town and Country Planning (Local planning)(England) Regulations 2012 Regulation 19 Consultation

Data Protection

Gosport Borough Council is registered under the Data Protection Act 1998. The information that you provide in completing this form will only be used by the Council in the development of the Gosport Local Plan 2011-2029. Please note that the completed form is a public document and as such will be made available for inspection and placed on the Council's website (personal details other than name of organisation/individual will be removed from version published on internet) and kept as part of the supporting documentation relating to the Local Plan.

Name:

Waitrose Ltd
c/o agent

Agent Name:

Shirley Karat

Organisation (if applicable):

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Firstplan

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Gosport Borough Local Plan 2011-2029 publication version document is available to view on the Gosport Borough Council's website: www.gosport.gov.uk/localplan2029

If you would like to discuss any element of the consultation documents further then please contact/telephone Planning Policy **023 9254 5228**

Print or Save as a copy of this form for your records



**All comments and completed forms should be returned by
22nd September 2014**

Completed forms can be submitted here



or emailed to planning.policy@gosport.gov.uk or by post to

Planning Policy Gosport Borough
Council Town Hall
High Street
Gosport
Hampshire
PO12 1EB

If you would like to make another representation on the GBC Local Plan 2011 - 2029 Publication Version, please click the Save as button to save the current representation or Submit.

You may then use the Clear form button to start a new representation.



Paper copies of the response form are available from the council's website, in the libraries and at the Town Hall (3rd floor reception).

Comments will be considered by an inspector approved by the Secretary of State who will hold an examination into the local plan in terms of its legal compliance and 'Soundness'

Further information on these terms is contained in the [Council's Guidance Notes](#) for making representations. Comments should focus on matters of soundness. These are defined in the National Planning Policy Framework and are reproduced below.

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective - the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and

Consistent with National policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1. To which part of the Local Plan does this representation relate?

Chapter	<input type="text"/>	Paragraph	<input type="text"/>	Policy	<input type="text" value="11.68"/>
Policies	<input type="text"/>				
Map					

If you would like to make further comments on the GBC Local Plan 2011 - 2029 Publication Version, please use a separate form for each representation you wish to make.

2. Please indicate under what grounds you wish to submit your representation

- 2a Support
(if you have entered Support, please continue to Q8.
- 2b Not Legally Compliant
- 2c Not Sound

3. If you consider the Local Plan is not sound, please identify which tests of soundness your response relates?

- 3a Positively prepared
- 3b Justified
- 3c Effective
- 3d Consistent with National Policy

4. Please give details of why you consider the Local Plan is not legally compliant or not sound?
(please be as precise as possible)

As currently worded, paragraph 11.68, is considered to be unsound as it is not 'consistent with national policy'. The paragraph states that 'when assessing retail, leisure and office development outside of town centres which are not in accordance with the allocations identified in this Local Plan, the Borough Council will generally require an impact assessment if the development is over the following size thresholds in terms of gross external floorspace:

- 1,000sqm for new retail development; and
- 2,500sqm for new leisure and office development.'

The inclusion of a threshold for the preparation of a retail impact assessment is fully supported and consistent with paragraph 26 of the NPPF. However, a threshold of 1,000sqm fails to accord with paragraph 016 of the National Planning Practice Guidance which advises that in setting a locally appropriate threshold it will be important to consider, among other things, the likely effects of development on any town centre strategy. The proposed threshold is considered to be too high in respect of new retail development, in particular, in the case of convenience retail floorspace. The Gosport Retail Capacity Study (2014) does not identify any additional capacity to support new convenience goods floorspace in the Borough across the plan period. This is primarily due to a number of stores in the Borough trading below expected company

5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound, with reference to the answer you have identified in Q3.
You will need to say why this change will make the Local Plan sound.

In order to make the Local Plan sound by being consistent with national policy, paragraph 11.68 should be amended to read:

'when assessing retail, leisure and office development outside of town centres which are not in accordance with the allocations identified in this Local Plan, the Borough Council will generally require an impact assessment if the development is over the following size thresholds in terms of gross external floorspace:

- 300sqm for new retail development; and
- 2,500sqm for new leisure and office development.'

6. If your representation is seeking a change, can your representation be considered by written representations or do you consider it necessary to participate at the oral part of the Examination?

No I do not wish to participate in the examination hearings

Yes I do wish to participate in the examination hearings

7. If you wish to participate, please outline why you consider it necessary.
(please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

n/a

8. If you wish to support the legal compliance or soundness of the Local Plan please use the space below to provide detailed comments

n/a

9. Do you wish to be notified at the address/email stated on page 1 of any of the following:

- a. That the Local Plan has been submitted for independent examination
- b. The Inspector's report has been published
- c. The adoption of the Local Plan

please tick



Thank you for filling in this form please return to Page 1 to Submit and/or make another representation

Page 4

REP 23/3 (Waitrose) – Section 4 continued

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- 2,500sqm for new leisure and office development.'

The inclusion of a threshold for the preparation of a retail impact assessment is fully supported and consistent with paragraph 26 of the NPPF. However, a threshold of 1,000sqm fails to accord with paragraph 016 of the National Planning Practice Guidance which advises that in setting a locally appropriate threshold it will be important to consider, among other things, the likely effects of development on any town centre strategy. The proposed threshold is considered to be too high in respect of new retail development, in particular, in the case of convenience retail floorspace. The Gosport Retail Capacity Study (2014) does not identify any additional capacity to support new convenience goods floorspace in the Borough across the plan period. This is primarily due to a number of stores in the Borough trading below expected company benchmark levels. Given that there is no identified need and many existing stores are undertrading, allowing new retail development, particularly convenience, of up to 1,000sqm without the need for a retail impact assessment could potentially have a significant impact on defined centres in Gosport. We therefore suggest a lower threshold of 300sqm would be more appropriate.

