



For office use only
Date 19.9.14
Ref No.
REP 23/1

# 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:**

Shirely Karat

**Organisation (if applicable):****Agent Organisation (if applicable):**

Firstplan

**Address:****Agent Address:**

Golden Cross House  
8 Duncannon Street  
London

**Post Code:****Post Code:**

WC2N 4JF

**Telephone:****Telephone:****Email:****Email:**

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](http://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](mailto: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="LP3"/>
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)

Policy LP3: Spatial Strategy states that the Local Plan will make provision for 10,500sqm net additional retail floorspace over the period 2011-2029. The provision of this level of retail floorspace is not justified or consistent with the evidence base and as such, the Local Plan is not considered to be sound.

The explanatory text states that the figure of '10,500sqm' is based primarily on evidence in the Gosport Retail Capacity Study undertaken by GVA in 2014. However, in relation to convenience floorspace requirements, the Study concludes that 'we have not identified 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. As a result, we consider that there is a sufficient level of floorspace in the Borough to fulfil any increases in local demand arising from population and expenditure growth.' In relation to comparison floorspace, the Study identifies a potential need for 5,365sqm of comparison floorspace by 2029 based on an aspiration to increase the Borough-wide retention rate for comparison goods expenditure.

The above figures taken from the Council's own up to date Retail Study are not directly reflected in Policy LP3. Instead, as explained in the Council's Retail Background Paper, the figures in the

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 justified by being consistent with the evidence base, Policy LP3 should either adopt the figures for additional retail floorspace requirements identified in the Gosport Retail Capacity Study (i.e. 0sqm for convenience floorspace and 5,365sqm for comparison floorspace over the plan period) or, make explicit reference to the fact that the 10,500sqm figure solely relates to a requirement for additional comparison floorspace and that there is no requirement for additional convenience floorspace.

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:

*please tick*

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



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

Page 1

## **REP 23/1 (Waitrose) - Section 4 continued**

Policy LP3: Spatial Strategy states that the Local Plan will make provision for 10,500sqm net additional retail floorspace over the period 2011-2029. The provision of this level of retail floorspace is not justified or consistent with the evidence base and as such, the Local Plan is not considered to be sound.

The explanatory text states that the figure of '10,500sqm' is based primarily on evidence in the Gosport Retail Capacity Study undertaken by GVA in 2014. However, in relation to convenience floorspace requirements, the Study concludes that 'we have not identified 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. As a result, we consider that there is a sufficient level of floorspace in the Borough to fulfil any increases in local demand arising from population and expenditure growth.' In relation to comparison floorspace, the Study identifies a potential need for 5,365sqm of comparison floorspace by 2029 based on an aspiration to increase the Borough-wide retention rate for comparison goods expenditure.

The above figures taken from the Council's own up to date Retail Study are not directly reflected in Policy LP3. Instead, as explained in the Council's Retail Background Paper, the figures in the Study have been adjusted in order to achieve the overall aspiration of clawing back additional comparison expenditure. Although Waitrose do not object to this aspiration in relation to comparison goods, concern is raised in respect of the approach taken to convenience goods.

Given the findings of GVA's Study, it is essential that if this aspirational '10,500sqm' figure is used, the policy makes it explicitly clear that this requirement solely relates to a need for comparison floorspace and that there is no requirement for any additional convenience floorspace over the plan period. This is particularly important given that many existing convenience stores are identified as undertrading.

