

**Winchester District Local Plan Part 2 – Examination
Representations on behalf of Hampshire Chamber of
Commerce
by Chris Corcoran MA Dip TP MRTPI
Rep No 51996**

Day 1- Tuesday 12th July am

Plan background/Evidence Base/Sustainability

Matter 1: Is the Plan supported and justified by clear and robust evidence?

These representations on behalf of the Hampshire Chamber of Commerce relate to that part of Winchester District which lies in both the PUSH area and the Solent LEP, they are primarily concerned with the policies for the economy and employment.


Winchester District is divided into two LEP areas for economic purposes, - that of the Solent LEP and the Enterprise M3 LEP. The Solent LEP includes the large hinterland to the east of Eastleigh and north of Fareham, including Bishops Waltham, Waltham Chase, Swanmore and Wickham while Winchester City with its surrounding villages fall into the latter. To the east of Winchester, the South Downs National Park is the northern limit of PUSH.

The PUSH/ Solent LEP area has long been a designated a growth area and continues to be so. However both PUSH and the Solent LEP have acknowledged that the area has been lagging in economic growth and is not achieving the growth levels of other parts of the South East or of its own target of 3% annual growth. This is an extract from the PUSH website describing its role and the interdependence with the LEP:

“Policy and Strategy

PUSH remains committed to delivering sustainable economic growth in partnership with partners across the PUSH area. The Solent LEP is now established as a private sector led body tasked with working collaboratively with local partners to stimulate and promote sustainable growth across the Solent region. PUSH is committed to working jointly with the LEP and other partners to deliver the growth

ambitions of the Solent area. As a consequence, PUSH continues to play a pivotal role in policy formulation related to spatial planning, housing and regeneration as well as producing a range of robust evidence based studies, necessary to articulate the growth ambitions of the Solent area. These policies / strategies guide PUSH's actions and decisions, and has to date helped to influence the decision-making of PUSH authorities and other bodies.

The Solent area now has a new Growth Plan entitled '[Transforming Solent: Solent Strategic Economic Plan 2014-2020](#)  2Mb'. This ambitious plan builds on the areas' strengths, harnesses the drivers for growth and addresses the barriers, which if not addressed, could hinder growth in the Solent region."

Winchester City Council is of course one of the key partners of PUSH and shares in its decision making.

The LP2 proposals for the economy in this area are

- Allocation of 2.6ha in Bishops Waltham.
- removal the proposed allocation of land adjoining Bottings Estate/ Botley station.
- Allocation of two areas South of M27 and retention of allocations at Whitely business park
- JCS policies CP 8 and 9 and for the rural areas MTRA 4;(the allocation of 20 ha is at Bushfield Camp, is not in the Solent LEP area and is targeted to the needs of the City of Winchester itself).

The Chambers view is that this is amounts to a severe restriction on economic and employment growth and fails to take advantage of the locational advantages or existing and planned infrastructure.

Addressing the Inspectors question in terms of LP2's economic policy and proposals, the Chamber has looked to see why LP2 has failed to respond more positively to the challenges posed by the Solent LEP and PUSH, and what justifies the failure to allocate more land for economic purposes when the population of them area is set to grow so strongly answer the

There are three reasons why the economic policies and proposals of LP2 are insufficiently supported and justified by its evidence.

- The evidence is old and has not been updated in the three years since JCS was approved to take account of more recent information.
- The evidence is for the District as a whole and does not look at the PUSH/Solent LEP area, which has separate priorities for the growth of the economy
- Circumstances have changed as a result of new policies and developments.
- The JCS inspector made specific recommendations about the need for further studies which have not been carried out

The evidence is old and has not been updated

When the JCS was approved in early 2013 its evidence base was mostly 3 or 4 years earlier. For the LP2 there has been no update of the economic base information; there is no additional discussion of economic issues in LP2. Consequently, in the Chamber's view this information base is too old and incomplete to be relied on as the basis for judging both for the immediate future and for the 15 year plan period.

The following further studies have been published by PUSH and the LEP encouraging increased economic activity: these include:

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1. "South Hampshire Strategy - A framework to guide sustainable development and change to 2026". PUSH:

This was published in October 2012 and was too late to be fully taken into account by objectors. This is an extract from the introduction to that document:

"Economic development, ...and many other issues cut across local authority boundaries, so it makes sense to address them in partnership across South Hampshire. By doing that, we will help maximise economic growth, ...

It is an aspirational document which echoes the PUSH Economic Development Strategy in seeking a step change in South Hampshire's

economic growth in a managed, sustainable way, with the growth shared by all communities.”

Local plans have taken their lead on floorspace provision from PUSH.

2. Transforming Solent: Solent Strategic Economic Plan 2014-2020: March 2013.

This is the Solent LEP’s submission to Government to support its plans for growth and for investment. It includes its targets for raising the levels of economic growth, productivity and business formation. Its focus is on its strategic sectors and clusters, namely marine, aerospace and defence, advanced manufacturing, engineering, transport and logistics and visitor economy businesses (see Sec 8). This is a plan for immediate action, for delivery within the next five years i.e. by 2020.

By contrast the JCS and LP2 identify five key sectors: Public administration and business services; land based industries; tourism and recreation; knowledge and creative industries. This radical difference in focus is explained by the dominance of Winchester as the main employment hub in the District. As a result the evidence base leads to a focus divorced from the economic considerations and policies of South Hampshire. What the PUSH area of Winchester has in abundance is land, which is much scarcer in the other PUSH districts.

3. PUSH: Position Statement and supporting documents (GL Hearn: Economic and Employment Land Evidence base paper) June 2016

The PUSH authorities have been discussing the revision of its Spatial and Economic strategy for the last two years or so. The result of that work is a “position statement” which was discussed on 7th June 2016 by the PUSH authorities who resolved to note it (but no more) and only noted that the Position Statement was to be published, it is unclear on whose authority. No further work on it is proposed. There is to no public participation and it has not been adopted as the common policy of the participating authorities which include Winchester.

Thus it does not have the status of the previous document which it now supersedes.

The position statement is now included as a Core Document EBSH5. The supporting study of GL Hearn has also been published and is the most up to date economic information, which supports further provision for economic and employment growth.

I attach the report of PUSH's director to the board of PUSH which explains the situation. **App1**.

Comments of Hampshire Chamber of Commerce on PUSH Strategy

The Hampshire Chamber of Commerce has put forward its concerns about the PUSH economic strategy to both the Solent LEP and to PUSH. One key element is the failure of PUSH to carry out monitoring, - i.e. - to assess whether its strategy has succeeded in improving the performance of the Solent economy. Of particular concern to the Chamber has been the very small amount of new land allocated in the recently approved local plans for economic purposes, combined with the lack of office development in the two cities; this was a central plank of the employment provision. The Chambers concerns were discussed with the Director of PUSH, who made a commitment made to undertake the review of the 2012 PUSH Strategy but only after the 2016 one had been adopted. Such an approach is not in line with good practice.

The Chamber's statement of its concerns and the response of the Director of PUSH are attached as **App 2 and 3**.

It is the Chambers view that the local plans in the western half of the Solent LEP have been a restraint on the economy, because of their failure to make adequate land available as NPPF requires. The LP2 shows no recognition of the aim of promoting economic growth in the PUSH/ Solent LEP part of its District.

It would in the Chamber's view be unwise for Winchester to reply on the PUSH conclusion that there is a theoretical excess of commercial land in the PUSH area as a whole and to use that conclusion to justify not releasing

additional land. This is PUSH's position too as summarised by PUSH in their Position Statement as follows:

"5.54 The figures set out are indicative, and reflect the potential net growth in floorspace. Much of the identified need could in theory be met through current employment land allocations and commitments (in terms of sites with planning consent for employment development). As at April 2015, allocated sites and those with planning permission could potentially support development of 1.5 million sq.m of employment floorspace on the mainland. There is thus potentially a quantitative surplus of employment land in the sub-region (though this does not take account of employment losses). There is a need for further assessment to test this quantitative position. Each Council will need to consider its strategy for employment land provision taking account not just of quantitative factors – but of qualitative issues, such as the quality and suitability of existing employment sites and their ability to meet modern business needs.

5.55 In considering what level of employment floorspace to allocate in local plans, it would be appropriate for local authorities to estimate what replacement provision may be required for losses of employment floorspace, resulting for instance from the redevelopment of outdated supply or through permitted development rights.

5.56 Not all existing employment land is in locations which are suitable for modern business needs. It is likely that some poorer quality sites and premises could be redeveloped over time for alternative uses; whilst some new land in accessible locations will need to be identified to support economic growth and attract investment."

It should be noted that Winchester has published no schedule of employment floorspace for the District since the Winchester District Economic and Employment Land Study (2007). Appendix C details the sites one by one. It is very out of date. It does not for instance include Bury Farm Curdridge which I will refer to further below. There is some qualitative assessment included in

this but that too is now in need of revision. The JCS commits the Council to maintaining an up to date Employment Land review. Para 8.20. It does not appear to have done so.

There has been no assessment of the losses of Commercial land to other uses in particular, residential. In Winchester's PUSH area, the most immediate example is the Bury Farm site, where 50 businesses are being displaced by the Whitely expansion. The losses in the adjoining Eastleigh District are much larger and there is no current replacement. The recent change to the GDO permitting offices to become housing has led to reductions in the current stock of commercial premises and employment locations across South Hampshire and in Winchester. This process is continuing; its consequences are significant and should be monitored.

LP2 evidence is based on Winchester District as a whole rather than in separate economic areas

See above

Circumstances have changed as a result of new policies and developments.

The following are some of the changes which affect the need for additional commercial land in the Winchester part of PUSH

- Approval of Fareham Local Plan with no additional employment allocations other than Daedalus and Welborne.
- Delay in the implementation of Welborne and the start of the commercial element of the new settlement.
- Fareham plan continues to limit the residue of the Whitely Business Park to offices, despite stagnation in market for 10 years.
- Eastleigh local plan found unsound and decision of Eastleigh to start again and no progress on any of the commercial allocations of the draft plan.
- No progress on Chickenhall/Riverside other than Fords.
- Botley by-pass now a firm proposal of HCC (current consultation; case put for funding via Solent LEP local Growth deal).

- Government encouragement to site new development close to Rail stations
- Emergence of Botley station as location with high levels of accessibility (improvement of rail main line service; completion of Whiteley Way; Botley by pass).
- Effect of Government changes to GDO on the supply of land, premises and jobs, especially the loss of office to residential in Southampton and Winchester.

JCS Inspector made specific recommendations which have not been actioned

The Examination of the Joint Core Strategy in n 2013 included discussion of the adequacy of employment allocations for the growing populations in Whiteley and South Hampshire. At Bottings Estate adjacent to Botley station the City Council were intending to remove the 2006 Local Plan allocation; objectors made proposals for further releases of commercial land in that area.

The Inspector's conclusions on this point and on the general policies for the economy of the rural areas are set out in his report in para's 44 to 46. He had reservations about the JCS conclusion that little extra land was required for employment. It depended, he said, for one thing, upon all existing sites being retained. So he required the City Council to address the need for more land around Botley Station in the Pt 2 plan and to consider other allocations within the MTRA's to meet local needs.

What has the City Council done? It appears to have taken no notice of the Inspectors remarks.

1. No reference to the PUSH update
2. The LEP's 2013 Strategy not taken into account
3. No account taken of the delays at Eastleigh's Riverside or the Eastleigh Local plan.
4. No consideration of the need for other types of commercial land or the needs of firms to meet the needs of large new growth areas ant Whiteley.

5. No provision for replacement of commercial sites lost to housing, for instance at Bury Farm, Curdridge, caravan Storage, Colden Common and at Waltham Chase
6. No consideration of the need of the Whitely growth area for further business and jobs:

At the same time the LP2 removes the allocation for extension to Bottings Industrial estate

ii) Will it satisfactorily and sustainably deliver the new development needed over the plan period to implement the objectives and requirements of Local Plan Part 1 ?

CP 8 commits the LPA to supporting economic growth, by allocating land as necessary to support employment growth at sustainable locations.

So it is difficult to see how WCC can answer this question in the affirmative, given the state of its evidence base, the growth in the numbers of economically active, the encouragement of existing South Hampshire businesses to expand and modernise and of new ones to set up. Businesses from outside the area are encouraged to locate to the Solent.

Were there a supply of commercial land and premises, to suit a wide range of firms, WCC might claim that it had made provision for change and growth in the economy. Were there a surplus of sites in the surrounding districts, that might provide premises for new business and jobs for the growing populations of Whiteley and of Wickham and of Bishops Waltham, Waltham Chase and Swanmore. But there is no reserve of land in any of the districts, other than at Welborne (which is severely delayed) and the residue of Whitely Business Park, (which is limited in its use).

The Botley Station Curdridge are appears highly sustainable in transport terms

iii) Are any policies or proposals inconsistent with national policies in the NPPF and, if so, is there a local justification supported by robust and credible evidence?

LP2 policies are geared to employment with little focus on the need of firms for land and premises. The focus on jobs is at the expense of the needs of

firms which are the drivers of the South Hampshire economy. NPPF paras 20 and 21 bullets 1, 2, 3. It is difficult to reconcile the approach of the City Council in LP2 with the National Planning Policy Framework on economic development. The NPPF's focus is on the economic growth, not solely on employment, so that land is available at the right place and at the right time; plans must be kept up to date and adapt to changing circumstances.

iv) Has the plan been the subject of suitably comprehensive and satisfactory sustainability appraisal [SA] strategic environmental assessment [SEA] and habitats regulations assessment (HRA)?

No comment

Day 1: Tuesday 12th July 2016

Matter 2: Meeting development needs

i) Does the Plan demonstrate that there will be a deliverable supply of developable new housing and employment land in appropriate locations over the plan period, with suitable infrastructure provision, in accordance with the NPPF/PPG and LP Part 1 ?

LP2 allocates no additional employment land in the PUSH area other than the three areas listed under Q1, at Bishops Waltham and two further areas at Whitely, both south of M27. At the same time it removes the 2006 allocation at Botley Station.

For the 3000 or so additional houses (plus the extra houses at the other MTRA settlements), there is no allocation for economic purposes north of M27, and only in two areas which can only be accessed by negotiating the heavily congested Junction 9.

At the same time, the Bury Farm Industrial estate is to be redeveloped for housing. 50 firms will lose their premises. There is no new land set aside for this purpose; the need was recognised only late in the date when the firms objected; their relocation has not been planned for in advance. A small task force has been established to help these firms relocate. The firms here are all small, requiring small buildings and low rents; they fall mainly into the B1c, B2 and B8 categories.

The assumption of the JCS inspector in supporting the “minimum allocation of commercial land” policy of the JCS is that all commercial land would be retained. So this land lost should be replaced.

Not that this is sufficient. Further land should also be released, as explained in my answers to Matter 1.

The Hampshire Chamber has identified the area around Botley Station as a suitable business location. It appears also to be sustainable in planning terms because of its high level of accessibility including by train. It is close to major populations in Hedge End, Botley and Whiteley and within normal cycling distances. The 2006 Local Plan allocation of the Bottings Industrial Estate

land for further employment also indicates sustainability. The surrounding area currently has a significant number of commercial premises in lawful use.

Further development here will also support and help to justify improvements in infrastructure, in particular the provision of the Botley by pass for which further funding is required

ii) Is there clear evidence suitably demonstrating how and why the allocated sites were selected, including in terms of appropriate consultation with the public, representative bodies, neighbouring authorities, service providers and other interested parties?

iii) Does the Plan deal appropriately and sustainably with the likely development needs of the smaller villages and rural area?

iv) Should the Plan address contingencies/alternatives, including in relation to the site allocations, in the event that development does not come forward as expected?

I have set out above a range of reasons why additional provision should be made for economic development. The Chamber believes that this is an immediate need and that there is a demand by local firms for additional land and premises. The Chamber believes the identification of land is the responsibility of the LPA and has not specified either the precise location or the amount of land required.

It is not satisfactory to leave the allocation of further commercial land to a review of the plan; the process takes far too long. Nor is it satisfactory to leave the initiative to commercial developers or landowners for a variety of reasons, but in part because that approach has not worked over the last 10 years or so.

Day 5 Tuesday 19th July**Wickham Policies WK 1-3 SHUA Policies 1-5**

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?

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

LP2 does not look at the employment needs of the Whiteley growth area or at the demand it may create for servicing. Nor does it consider the wider needs of the South Hampshire economy and how this area could contribute to them.

The Hampshire Chamber has identified the area around Botley Station as a suitable business location. It appears also to be sustainable in planning terms because of its high level of accessibility including by train. It is close to major populations in Hedge End, Botley and Whiteley and within normal cycling distances. The 2006 Local Plan allocation of the Bottings Industrial Estate land for further employment also indicates sustainability. The surrounding area currently has a significant number of commercial premises in lawful use.

Further development here will also support and help to justify improvements in infrastructure, in particular the provision of the Botley by pass for which further funding is required.

In terms of the Botley Station area it has the advantage of a regular mainline service to Waterloo which is underused. It has multiple road links which are being upgraded and new ones added. There is ample, undeveloped land.

Why WCC have seen fit to **reduce** the amount of land for economic development when there is a growing working population and a growing economy and policies to promote growth and no reserve of undeveloped land, is difficult to understand.