

Winchester Joint Core Strategy (WJCS)

Representations on behalf of Steeple Court 30094 and Ian King 30092

Economy / Employment / Retail

Response to Inspector's questions for session / issue 2

These comments are made on behalf of Steeple Court Estate and Mr & Mrs Ian King of Pinkmead Farm whose land adjoins each other. Part of this land is already allocated for employment purposes (retained WDLPR policy S7) which confirms the general suitability of the location. The land includes the junction of the Park Gate bypass with the Botley bypass. It includes much of the line of the bypass safeguarded by retained WDLP policy T12, to the implementation of which the land could contribute. The land also adjoins Botley Station which has recently improved links to both east South Hampshire and to Winchester & London. The market potential of the land is already shown by the commercial premises around Botley Station and along the roads to Whiteley and Wickham.

Question 1

Are the employment policies and proposals, including for Bushfield Camp [Policy WT3], consistent with the NPPF and/or justified by clear and robust evidence?

The employment proposals of the Local Plan are focussed primarily on Winchester and South Hampshire (the PUSH area), and are supported by CP8 (economic growth & diversification) and CP9 (retention of employment land and premises). These comments focus on the PUSH area.

Lying behind all of these policies for the PUSH area of South Hampshire are the policies, studies and strategies of PUSH. The latest of these and of fundamental importance to the Plan is the "South Hampshire Strategy; a framework to guide sustainable development and change to 2026" approved by the PUSH on 2nd October 2012 (SHS). I assume that this document is now a Core Document for the purposes of the Examination of the soundness of the Plan. The short period between the start of the Inquiry and the publication of this key strategy is not helpful. Moreover the strategy has not been subject to any independent scrutiny of formal public participation so the only forum in which its conclusions can be challenged or commented upon is in the current examination of the Winchester JSC.

Distribution of new employment

The employment envisaged by the SHS for that part of Winchester in the PUSH area is 90,000 sqm of offices and 88,000 sqm of manufacturing and distribution. It is not clear how this is to be delivered but it would appear that it is to be in 3 locations according to WJCS policy SH1 namely Whiteley, Segenworth and West of Waterlooville. There is no conversion between the floorspace figures in SHS and the WJCS. Within the PUSH area, the Winchester provision is concentrated in the east at Waterlooville and in the central part, Fareham. The north Whiteley proposals are primarily corporate offices with Segenworth providing medium sized buildings of a more general sort. There is little contribution made by Winchester to the needs of the western part of the PUSH area and no analysis of the geographical distribution of new employment.

Provision for sectors

PUSH in para in 3.6 – 3.8 highlights particular growth sectors. In 3.6 it identifies creative industries as well as health & care sector, 3.7 aerospace, aviation and marine and in 3.8 the need for “adequate provision for this sector”. NPPF para 21 direct LPA’s to consider the needs of the economy in this way.

However the WJCS policies do not appear to focus upon sectors. There does not appear to be any testing of the allocations against these specific requirements of PUSH or NPPF.

The inadequacy is most striking in 3 respects:

1. Distribution
2. The narrow type of new employment
3. Specific lack of provision.

1. The distribution as I mentioned is heavily weighted towards the east of the sector where there appears to be substantially greater provision of employment (Daedalus and the growth areas of Waterlooville and north of Fareham as well as the Whiteley, Segensworth). For the east sector no specific provision within the Winchester Plan.

2. The limited type of development. The allocations at Whiteley are heavily focussed on corporate offices, and at Segensworth, medium sized warehouses and office development.

Specific shortfalls. The type of additional provision which is required is:-

1. Logistics – which increasingly requires large areas of land with excellent access to motorway. See PUSH SHS para 3.8. WJCS makes no provision for logistics in the west of its area where it is needed.
2. Sites for smaller sheds for both start-ups and move on for smaller firms and general industry.

The need for this type of industry can be seen in and around the Botley Station area and between it and Whiteley. Uses include series of converted farm buildings generally of poor specification but contain a wide range of firms from hi-tech Defence specialist ULTRA to car repairs. At the Bottings Estate the quality of the buildings is low but houses firms which are essential parts of the local economy. Additional land for this sort is required to meet the needs of local firms.

Both PUSH and WJCS focus more on employment than on the needs of firms unlike the NPPF whose language is different; in paras 18 – 22 it lays stress on economic growth; the creation of jobs is important and is only one of several aspects. The needs of firms are recognised in paras 20 requiring LPA’s to plan proactively to meet the development needs of business. WJCS focuses almost exclusively on the provision of floorspace to meet employment as opposed to the needs for firms to expand. The Studies supporting both PUSH and WJCS again are primarily job focussed. This fundamental difference leads the WJCS policies away from its principle focus which is providing land for firms.

NPPF also requires policies to be flexible enough to accommodate needs not anticipated to the Plan and to allow a rapid response to changes in economic circumstances.

See NPPF Para 21 bullet point 3I cannot see any flexibility in the PUSH or WJCS policies. There is to be no additional allocation of land for economic development until after 2016 (see PUSH policy 1). WJCS makes no allowance for review of the policies and proposes no additional land for the whole of Plan period other than the three allocations.

It would appear that although the economy as a whole is not growing there is a substantial restructuring taking place in particular sectors with firms modernising, re-organising expanding in certain areas.

Duty to cooperate: Eastleigh - Riverside

A further lack in PUSH is a failure to consider the consequences of delay in delivering additional provision at Riverside. This major industrial / railway / airport complex to the east of Eastleigh town centre is identified as a Strategic Employment Area within the South East Plan. The delay in the implementation of this is now recognised by Eastleigh Council in their Pre-Submission Local Plan because of the cost of provision of infrastructure. The consequences for the economy of South Hampshire and in particular of the western part of south Hampshire focussed on Southampton is not spelt out; Nor is it considered by WJCS. There does not appear to have been cooperation between Councils on this. Flexibility is required within the Winchester policies to compensate for delay of the implementation of Riverside and its revised strategic focus.

The WJCS generally adopts a radically different approach to the Winchester Town area than it does to the PUSH area. In Winchester there are no strategic requirements for additional employment. In-commuting, to supply labour for the jobs which are in excess of the areas needs is to be increased by the provision of up to 20 hectares of employment at Bushfield which equates to 80,000 sqm of floorspace or about 8,000 jobs. This is out of a centre location drawing people by car. South Hampshire the PUSH area, however, is designated as an area for growth with the full agreement of all participating local authorities. There does not seem to be the same approach to making good specific deficiencies in the PUSH area despite its greater importance in Economic terms. WJCS & PUSH should be seeking out opportunities proactively such as those at Botley Station where there is under used capacity in the improved rail service and where the road system is being actively improved and which is close to major population growth. My client's formal objection includes plans and narrative showing how about 17 ha could be provided here and how it would assist and meet strategic objectives.

Question 2

Will they deliver the levels of new employment sought, or if not what else needs to be done and / or should more [or less] land be identified for example by allocating new brownfield [PDL/Greenfield sites]?

The question here should focus more upon firms than on employment particularly local. As my comments on question 1 indicate, the sites allocated are heavily focussed on the east and are limited in their variety to corporate offices (Whiteley) and to medium sized warehouses and offices and warehouses at Segensworth. The WJCS relies for all other needs (for example small sheds or logistics) on farm

premises, which are neither identified nor is their past contribution explained or assessed in the Evidence Base. Farm sites are relatively constrained and are not part of a strategic plan nor often the most sustainable. Additional land needs to be allocated within South Hampshire.

On the assumption that a further Local Plan Development Plan Document will be prepared indicating sites within South Hampshire, changes to WJCS are required but would be modest. The following addition can be made to SH1 bullet point 5 insert after “(mostly already committed)”; “to increase provision of sites well related to existing and new transport links and to existing and proposed housing, in order to complement existing provision especially small firms and start-ups for instance around Botley station and for logistics by at least 20 ha”.

Detailed allocations would then take place in the succeeding development plan documents. This is not a major change since it is already included within the objectives of both PUSH and WJCS.

Question 3

Should the policies be more specific in relation to the amounts and locations of new employment provision to be sought over the plan period?

The policies should be more specific, not in relation to the amounts and locations of new employment but to the sites required for firms over the full range of the south Hampshire economy. Clearly these need to be agreed with neighbouring authorities. The provision of additional employment land around Botley station for instance has a clear benefit in providing economic opportunities for the new housing in Eastleigh round Botley and Hedge End and at the same time exploiting improved transport links and the strategic advantage of the rail line see Eastleigh Local Plan: 2011 – 2026 Pre-Submission. Such nodal points as Botley Station are few and far between in South Hampshire and therefore it would be appropriate for them to be identified as locations of new employment provision. It is a clear “opportunity site”. The amount of land available on the Steeple Court Estate and Pinkmead is substantial and it could be extended on demand, subject to the capacity of the infrastructure and environmental constraints; 15 – 20 hectares could be identified. There are few competing opportunities for such development in the adjoining district of Eastleighor further north in Winchester.

This land should not be made dependent upon the provision of the Botley bypass; the Highway Authority has decided there is spare capacity in the road system, even to cope with major additional development in Hedge End / Botley and at Whiteley. The area proposed for further employment here is modest and should not cross a threshold. It may even reduce the use of the private car because of the railway and proximity to populations. The Highway Authority’s opposition to the Botley bypass should not constrain the economic development to which it is committed as a key member of PUSH.