

Session/Issue 2:

- i) Are the employment policies and proposals, including for Bushfield Camp [Policy WT3], consistent with the NPPF and/or justified by clear and robust evidence?
- ii) 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?
- iii) Should the policies be more specific in relation to the amounts and locations of new employment provision to be sought over the plan period?
- iv) Is it appropriate in principle and reasonable in practice to safeguard existing employment areas and/or should more flexible criteria [such as in relation to economic viability] be used to help make more effective use of brownfield sites [PDL]?
- v) Does the JCS plan appropriately for the management and growth of retail centres over the plan period, focusing on higher level centres to provide a strategic framework?
- vi) Is the presumption of “town centres first” consistent with national policy in the NPPF and/or justified by clear and robust evidence and appropriate in the local context?
- vii) Should the JCS indicate suitable and appropriate floorspace levels for the scale of new retail development in centres over the plan period?
- viii) Should the JCS seek to proactively manage and/or improve the evening/night time and/or the tourism economy in the various centres/locations?

Question i)**Bushfield**

We are firmly of the belief that the Bushfield proposal stems from a particular personal obsession of an ex-Leader of the City Council. It is very hard to determine why this proposal is in the JCS as it smacks simply of an *ad hoc* last-minute ‘good idea’.

There is a presumption at the very beginning of the discussion of the site (JCS 3.34) that the Council should work *‘positively with the landowner to identify a sustainable solution for the site, given its sensitive location’*. Why? Why is it the duty of a local authority to find a way of making a landowner, who has purchased the land speculatively, a rich development profit?

There are many areas of land taken over by the military in earlier, more troubled times, which now seem to be seen as development opportunities because they can nicely be designated as ‘brown-field’. Are we to see Salisbury Plain as some great retail park because of retrenchment in the Armed Services? The exigencies of wartime have often easily been seen to justify severely damaging beloved heritage and environment. Anyone who has seen the great propaganda poster art of the Second World War will know of those marvellous landscapes of downland and meadow, appealing for a sacrifice with *‘It’s Your Country – Defend It’*. The exigencies of War are one thing; the promises made bespoke a Peace that would return or repair the losses.

The sustainable solution for Bushfield Down is to return it to the way it was. The Army Camp on Bushfield Down is easily removable – volunteer groups could do it. There is clearly a local desire to have

this land back – an Inquiry into its possible registration as a village green is scheduled later this year¹, though the developer is bringing in big legal guns to try to prevent this inquiry happening. Developing Bushfield is a simple betrayal. Why the City Council should be encouraging such a bullying and unscrupulous landowner is very hard to discern.

The question asks for robust evidence that the City Council's bright idea is justified or would even work. JCS certainly does not offer any, only making vague statements that Winchester's knowledge-based qualifications make fertile ground for such a concept. We are very unclear what the Council means by a knowledge park. We can find no examples of 'knowledge parks' that show any clear differentiation from science parks. The only successful ones of which we are aware are those that essentially spin-off from nearby centres of science- or technology-based excellence.

We know of no science or technology base in or near Winchester that could remotely be regarded as prestigious enough to give the City Council any hope for success with their adventure. Winchester University has no science base. The nearest significant scientific centre is the IBM facility at Hursley, much retrenched over the years (it used to have research facilities in Winchester itself, but these were withdrawn to the Hursley Park many years ago as IBM research contracted in the UK). We cannot imagine any reason why Bushfield should attract any spin-off from Hursley, which is self-contained and has plenty of space to expand if there were any reversal of the trend to retrenchment (Hursley demolished buildings 20 years ago and reduced its footprint).

Southampton University has a science and medical base of the right calibre. But it has its own Science Park at Chilworth. And we would find it very hard to see how a facility at Bushfield would serve Southampton University except by motorway connection, so that all the claims for Bushfield having a sustainable justification in this respect seem absurd (indeed we boggle at the general notion that Bushfield's location close to a motorway is a thing to encourage when a Council is claiming to have sustainability at heart).

Winchester Council should take a trip to Amesbury. Wiltshire Council had the same bright ideas for a Science Park. They ripped up 160 acres of downland within sight of Stonehenge and created Solstice Park. They attracted a single science company, Tintometer. Over the years the terminology on the website changed from 'Science Park', to 'Industrial and Office Park', to 'Industrial, Distribution, Office and Roadside and Leisure'.

The reality of Solstice Park is vast tin-shed distribution centres, a sector with probably the lowest wage economy and indeed, with automation, with very low employment, KFC, Pizza Hut and McDonalds road side outlets. Tintometer remains as the only science-based company and it has very vocally been fighting Wiltshire Council's desperate plans to build ever larger tin-sheds, saying it is not what they signed up to.

Wiltshire Council should have walked away from Solstice Park when it was clear very early on that it would fail. But Councils, at both officer and councillor level, seem constitutionally unable to admit a failure and simply go on digging bigger and bigger holes for themselves.

NPPF: We are not going to quote wholesale from NPPF, but refer to §11 and specific paragraphs relating to valued landscape (para109); plans allocating land of least environmental or amenity value (para 110); landscapes important to National Parks (para115); plans should promote the preservation, restoration and re-creation of priority habitats, ecological networks. The Bushfield proposal clearly violates all of these considerations.

We would also cite §12 on conserving an historic environment. Winchester is a classic gap town in the great chalk ridge that comprises not only the South Downs, but also extends well into North West

¹ We note that the JCS chooses not even to mention that locals are seeking village green designation.

Hampshire and Wiltshire. As we say elsewhere, Cobbett's classic Rural Rides describes the hills encircling Winchester as the finest spot in England. All the hills on the west side of the Itchen Gap have now been developed, except Bushfield Down. The Council's assault on this landscape is perhaps less serious than the destruction of Twyford Down for the M3 motorway, but without any of the justification – it seems wilful.

Other employment:

We do not add much here to what we said on general economic forecasts under our comments in the March consultation. We see no new evidence that might lead us to doubt our previous criticism of the optimism of the DTZ 2011 report. Indeed circumstances are already clearly showing that DTZ was making all the wrong assumptions a year ago. It clearly believed the Recession was over and normal growth would resume fairly soon (§2.3): *'Figure 2.3 presents data for employment change in 2003-2007 – the five year period before the economic down turn. Figure 4 presents data for 2008-09 – the period which contains the recession and return to growth and is the latest available data.'* Who now believes such nonsense? – not even the Chancellor of the Exchequer we imagine.

A rule of these submissions is that they do not contain diagrams. But the absurdity of the DTZ position can be seen diagrammatically at www.bbc.co.uk/news/10613201 which compares the current recession with all previous ones. We cannot see how a respectable organisation can extrapolate such optimistic nonsense from such a startling graph. This is a fundamentally different recession to what has gone before (and one does not have to go far in the direction of thinking about diminishing world resources and growing competition from the less-developed world to realise why).

GDP is now lower than it was more than 2 years ago, when DTZ seem to believe we started recovering. It is 4.6% lower than it was in 2008. Presumably DTZ were making original predictions in 2007, based on an assumption of treasury forecasts of around 3% growth, which would mean that GDP now would have been 16% higher than then, i.e. around 20% higher than it actually is.

How does the City and DTZ manufacture optimism out of this? Incredibly it concedes to the GDP graph to the extent that it predicts declining employment in production and manufacture in this area, but then finds an amazing future curve of growth in what it calls 'Services' (Fig 2.6) which more than compensates for the drop in productive employment.

Central government is very exercised about increasing productive parts of the economy, i.e. those deemed to be generating wealth, so it seems very strange at the moment that DTZ see such a great future in service provision, which is a wide-ranging term, but certainly errs towards activities where wealth is spent rather than earned. And this at a time when the public sector, on which Winchester is quite dependent, is in retrenchment. Police administration is downsizing and moving out of Winchester. Winchester hospital is increasingly a minor partner in an NHS tie-up with Basingstoke. The City and County Councils we imagine are cutting back on employment. University expansion is coming to an end. There are even suggestions that the Army may be going from Winchester.

We contend that the best assumption that a Plan can make, looking at the GDP graphs and thinking about where the major employment is in Winchester, is that the economy will stay the same as it is. As such there is no need to look for any net gain in employment land. If that is deemed to leave a Plan unable to cope with a surprise upturn, we would point out that there remains significant brown-field land in Winchester that has now been out of use for upwards of 5 years (significant areas of Bar End have been empty since before the Recession began).

Question ii)

Will they deliver the levels of new employment sought? We struggle with where the circle begins on this sort of planning. We know that the predictions of extra housing demand are based on an assumption of the desirability² of importing population from elsewhere in the UK. And then this assumption drives the plan to provide employment for the people that have been attracted. But the circle can equally work the other way – if the employment does not materialise (and every Council in the land is as desperate to seduce employment providers as WCC) then the population will tend to follow or rather get closer to the places with a greater overall attractiveness.

Question iv)

This appears already to imply that we might not be talking about provision of extra land for employment but about the possibility of long-term under-use of existing employment land. We have already pointed out that there are areas of land designated for industrial use which have been in long-term disuse (particularly at Bar End). Some of this land could be put to other use, e.g. for social housing³, rather than build on valued greenfield sites as the City proposes to do at Abbots Barton.

Questions v) and vi)

We are not entirely clear what Question v) means, but these two questions appear to relate to the desirability of out-of-town or edge-of-town retail facilities as opposed to traditional town-centre locations. For us the environmental arguments are clear and we will come to them. NPPF seems consistent with our view (§2 para 23.) that town-centres come first, then edge-of-centre and last of all out-of-centre.

Friends of the Earth would always take the view that a presumption towards localism is an essential element of sustainability. We should always consider both in terms of resource consumption and climate damage, the externalised costs of planning that encourages journeys that need not be made if alternative planning principles were adopted.

Car-based retail centres in our view are not only indicative of how wrong society has become but also inculcate a dependence on rapidly declining resources that bodes ill both for our environment and our economic welfare. If we had had sane environmental policies in this country they would never have been allowed to happen. This is not about needlessly interfering with freedoms. Externalities are about restricting the freedom of others to do other things. The externalities of car-based transport are very large⁴ and if they were paid for by the user then car use would be hugely curtailed.

Winchester has certainly suffered traffic consequences from the provision of edge-of-town shopping. The average access journey from within a town to an edge-of-town site is significantly longer than a central access journey. And there are distinct traffic problems that arise. The Tesco supermarket on the east side for example, is almost certainly responsible for encouraging a growth in cross-town traffic through the most sensitive and polluted central area.

The problem about town centres is that, central government having encouraged a car-based economy, town planners feel they have to compete with it on its own terms – an example of the classic principle of the *Fallacy of Composition*.

² As distinct from likelihood. WCC never really distinguishes ‘need’ from ‘demand’. In our view the longer term likelihood of population growth in Winchester area will be affected by the cost of transport. As rail fares and petrol costs rise (and Post-Peak Oil we would expect a remorseless and accelerating rise in price as we descend the Hubble curve, even if continuing Recession stifles demand) we would expect a reduction in long-distance commuting. WCC might argue that that is all the reason for creating new employment in the area, but the likelier scenario is that population will gradually move closer to the employment attractors of greatest weight – the big cities. This of course puts much greater doubt on the assumptions of housing demand in this area.

³ Given that there are no insurmountable contamination issues.

⁴ Academic research usually puts these at about 2-3 times the total taxation on car transport (See Blueprint publications)

In our view making town centres work is about making the environment right, so that people want to be there. Car-based access prevents town centres from being the spaces where people want to linger. Public-transport-based access not only clears space for people to enjoy, but being much more efficient allows much greater access, especially to historic town centres with easily congested road network.

Question vii)

We do not particularly object to the notion of local authorities designating areas for possible expansion of retail floorspace, but we think that has to be very cautious and they should have flexibility to change designations, if other better land use emerges. We certainly do have our doubts about a local authority making predictions about retail floor-space. The Nathaniel Litchfield report (Winchester Retail Study Update) is as suspiciously defective as the DTZ employment forecasting. At §2.24 we have: *The economic downturn suggests that rates of growth during the past few years are unlikely to be achieved in the short term, but the underlying trend over the medium and long terms is expected to lead to a need for further retail floorspace.* You simply cannot assert an underlying trend in the ground level as you walk over a cliff. Such predictions are entirely worthless and indeed worse than that – dangerous, giving spurious authority to uninformed guesswork.

Question viii)

They should not be proactive about specific initiatives on tourism/entertainment. They do not have a good record on this. There are many wonderful happenings in Winchester that come about through the initiatives of individuals and groups. The Hat Fair, for example, has grown steadily over the years and is well-known from afar. The City Council's own Carnival initiative many years ago, simply fizzled out. What the Council usefully does is respond positively to emerging grass roots, in the way, for example, it did with the Farmers' Market.

The best contribution that the Council can make to the tourism/gastronomy/entertainment economy is to ensure that the ambience of the city is right for it. Streets for people rather than cars is essential for this.