

ECONOMY/EMPLOYMENT/RETAIL - Policies CP8, CP9 and WT3
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?

1. The employment policies and proposals are not effective, justified or based on clear and robust evidence and not positively prepared. They are also wholly inconsistent with the NPPF. There is no clear economic floorspace or jobs figure that the JCS is working towards and the economic and allocation policies that could help achieve such economic objectives were they to exist do not provide a sufficient level of detail; we strongly suggest there is a requirement for the JCS to clearly set out a jobs and / or floorspace target and clearly identify where the employment requirements will be delivered and give some indication as to when it will be delivered. **The evidence base which informs JCS Policy CP8 is not up-to-date and does not demonstrate an adequate and realistically deliverable supply of employment land.** It is unclear why the LPA has not included a job or floorspace target, however there are a number of potential reasons including:
 - As fully explained in our statement in response to Question 1 iv, the LPA does not set out a clear economic /job growth target as the evidence demonstrates the need for more housing to support this job growth;
 - There is uncertainty and a lack of clarity in respect of the jobs / floorspace requirement for the whole District and its component policy areas including the part of the District within PUSH;
 - The LPA does not have an up-to-date evidence base to demonstrate the deliverability of employment sites over the plan period.
2. NPPF paragraph 158 is clear that LPAs must ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic prospects of the area.
3. There are a number of evidence base documents and policy documents which put forward varying jobs / employment floorspace projections and requirements over various time periods covering various parts of the District. The Table 2 below attempts to summarise these in a coherent manner and relate this back to the need to supply adequate floorspace / jobs in the right locations over the period. Where possible, we used the same density assumptions used by the LPA¹ in its most recent employment evidence document² to determine the requirements below where only partial information was supplied. There is no information available in respect of the break-down of employment land / jobs being planned for in Winchester and the market towns / rural areas.
4. To assist the Inspector, Table 2.1 below attempts to clarify the floorspace / jobs requirements for the District in the absence of such clarity from the LPA's Plan and supporting evidence. What is clear from the table below that the JCS is not planning for enough jobs to meet the South Hampshire Strategy (2012) as it is only planning for 8,750 jobs for the entire District over the plan period whereas the South Hampshire Strategy expects the part of the District within PUSH alone to deliver 8,875 new jobs over a shorter plan period (2011-2026). Furthermore, the South Hampshire Strategy refers to 9,000 additional jobs by 2026 in the health and care sector and 5,000 jobs in

¹ Employment Densities Guide 2nd Edition, Drivers Jonas Deloitte (2010)

² Review of Employment Prospects, Employment Land and Demographic Projections (Aug 2011)

hotels and restaurants (para 3.6) in the PUSH area. These employment figures do not appear to be addressed in the Local Plan.

Table 2.1 – Winchester District Employment Requirements

	Floorspace	Jobs
Winchester JCS para 6.10) 2009 – 2031	Not provided	9,270
Winchester JCS (para 2.6) 2011 – 2031	Not provided	8,750
South Hampshire Strategy (2012) Part of District 2011 - 2026	B1: 90,000 sqm B2 / B8: 88,000sqm Total: 178,000 sqm	B1: 7,500 jobs B2/B8 ³ : 1,375 jobs Total: 8,875 jobs
PUSH Employment Floorspace Policy Framework (Dec 2008) Part of District 2006-2026	B1: 146,000 sqm B2: 5,500 sqm B8: 48,000 sqm Total: 199,500 sqm	B1: 12,166 jobs B2: 153 jobs B8: 686 jobs Total: 13,005 jobs

5. The LPA's most recent employment land review⁴ was undertaken in 2007 some five years ago. This is the last time a comprehensive review of existing and potential employment land was undertaken in the District. This study concluded that RSS employment growth requirements equates to around 44 hectares of employment land in the District outside of the PUSH area and an additional 50 hectares of employment land for the area within PUSH. The study concludes that there is around 85 hectares of available employment land.
6. A supplementary report to this study was then completed in 2009 suggesting that circa 24 hectares of employment land is required between 2006 and 2026. The study included a "background to the site development assessments" from the original 2007 review but only for Winchester Town, not for the remainder of the District. A study⁵ was published in August 2011 to support the JCS which estimates that the District needs circa 16 hectares of employment land between 2009 – 2031 excluding the re-use of existing B2 land. However this study does not include a review of existing or potential employment land.
7. The JCS then states that the location of existing employment land commitments supports the PUSH development strategy and there is no need for further new employment allocations for the South Hampshire Urban Areas. It is then explained that the North of Fareham SDA in part mitigates the need for any further employment allocations in the Winchester part of PUSH.
8. Relying on the North of Fareham SDA to deliver the employment needs in Winchester District is not expressed as part of the JCS development strategy nor does it appear to be accounted for in policy and evidence prepared for the North of Fareham SDA. Policy SH4 and its supporting text does not mention employment at the SDA nor does it explain that the SDA will contribute to Winchester's employment requirements. Therefore the North of Fareham SDA should not contribute to Winchester's employment land supply. It is simply ridiculous that the LPA is reliant on a

³ 90% assumed B8 and 10% assumed B2 in line with PUSH Framework for Employment Floorspace (2008)

⁴ Winchester District Economic and Employment Land Study (2007)

⁵ Review of Employment Prospects, Employment Land and Demographic Projections (2011)

development located outside of the District. There is no evidence from Fareham BC that they support this approach under the duty to cooperate.

9. The JCS explains (Paragraph 3.58) that existing permitted and allocated sites will provide the land needed to deliver the floorspace in PUSH's Employment Floorspace Policy Framework (2008) however as the Table 2.1 illustrates, the South Hampshire Strategy (2012) adopts updated floorspace figures to that contained in the policy framework document. Therefore, the policy framework document should now be considered superseded by the South Hampshire Strategy and the employment land supply should be clearly set out against this updated target. Further to this point the PUSH Employment Floorspace Policy Framework identifies a shortfall in warehousing floorspace and suggests that more land be allocated for this use, however this does not appear to be addressed in the JCS.
10. Nowhere in the JCS or supporting documentation does it provide an updated evidence base demonstrating where the existing permitted and allocated sites are and how these meet the employment requirements.
11. It appears that there were a number of adjustments made to economic growth assumptions in the employment evidence base as a result of the recession however a similar reassessment of the employment land supply was not undertaken to take into account the recession whereby sites that may have been suitable and deliverable in the 2007 employment land review may no longer viable.
12. In order to make Policy CP8 sound, it needs to set out the floorspace, jobs and land requirements for Winchester Town, the market towns and rural areas and the area within South Hampshire and base this on clear and robust evidence. The policy should then specify the employment allocations and a trajectory for its delivery over the plan period with intended delivery sites clearly set out, just as the housing supply is set out. We do not consider it possible at this stage to suggest alternative policy wording as the required evidence has not been provided by the LPA as set out above.
13. In terms of Bushfield Camp Policy WT3, it is not clear what the LPA's objective or preferred use is for this site. It is also not clear whether this site is deliverable. The current policy wording suggests that it is a 'problem site', **however as the policy wording is currently drafted there are no clear policy solutions to enable its delivery**. In order to make this policy sound we suggest that the LPA consider what type of use(s) it would prefer for the site and how it helps deliver the overall development strategy and set this out clearly in the policy.
14. In conclusion, we would like to bring to Inspector's attention that fact that the NPPF requires Local Plans to be proactive and positively prepared. In contrast, this plan appears to be woefully lacking in any vision, failing to identify sufficient jobs and homes, thereby hindering economic growth and seeking to get away with doing the bare minimum possible so as to avoid taking difficult decisions.
15. **Notwithstanding our suggested revised wording, in our opinion, the JCS is clearly unsound and cannot be rectified by merely revising text or policies. Rather, the JCS needs to be reconsidered in light of the evidence we have submitted and a revised Plan brought forward that reflects the housing and economic needs of the area, complies with the duty to cooperate and fully meets the requirements of the NPPF.**