

HEARING SESSION 3 EMPLOYMENT

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## SESSION QUESTIONS: EMPLOYMENT

1. Will the CS provide adequate employment opportunities of the right type?
2. Is the policy for the protection of existing employment sites appropriate? Have the right sites been identified for protection?

**Response to Question 1**

**Policy CS2:** The policy focuses tightly on traditional B class employment uses and seeks to ensure that strategic levels of new floorspace are met. In so doing however, the policy fails to recognise the need for change in the nature of employment and the growth of the service economy in providing a dynamic and growing economy at the local level. The rationale for the employment space required is derived from the RSS which has now been withdrawn.

The policy fails to recognise the economic and employment contribution from non B class uses and hence does not reflect the thrust of PPS4. This is then cascaded into the development management policies (DM3) which adopts a similarly restrictive approach to economic development. The overall approach is therefore, unsound and is likely to frustrate rather than stimulate economic development in a changing economy.

Paragraph 3.08 of the Core Strategy refers briefly to the fact that “*significant number of jobs are provided by use classes other than the traditional B1, B2 and B8 uses*”. Yet this conspicuously and significantly underplays the issue, with the Employment Land Review carried out by DTZ (Feb 2010) identifying at Fig 1.2 the sectors with the greatest employment growth (education, health, hotels, catering and other services) and those in decline (electronics, metals, transport equipment).

Figure 1.8 of the study takes this further and demonstrates that in fact the majority of employment in 2008 was in non B class sectors, which represented around 60% (23,700) of all jobs. Moreover, employment in B class uses shrank by over 2,200 jobs between 1998-2008 while other sectors increased by over 4,900 jobs. This is also reflected in the actual number of businesses (and consequently by implication in business space) which in Figure 1.9 show that the number of non B class companies dominate in all size ranges up to 200 employees. The decline in B class uses is reflected in the unemployment ranks shown in Figure 1.17.

The Study goes onto identify (para 1.61) over 33,000sqm of B class space on with permission and limited investment activity in the sector. It identifies non B class activities as some of the most likely to grow in Havant in figure 1.22.

The assessment in the evidence base therefore, clearly demonstrates the mismatch in the assessment of economic activity, underlying trends away from B class uses and the strategy adopted in the Core Strategy which seeks to focus and retain rigidly a stance to protect B class floorspace.

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The policy also restricts B1a uses (and other town centre development) to town centre locations (though there will also be provision in the new strategic locations) and fails to refer to central areas that currently fulfil an employment function (such as Solent Road, Havant) where there is a high level of accessibility and which would accord with the overall aims of regeneration focussed on accessible locations within the main towns (especially Havant). The redevelopment of existing ageing employment uses in highly accessible locations near to town centres for a range of town centre uses would be appropriate and accord with PPS4. This is particularly so in the case of Havant, where land in a highly accessible location, close to public transport and the town centre offers a much more sustainable location for higher density economic activity than a location in a smaller town or even a lower order centre elsewhere.

It is perhaps worthy of note also that the Core Strategy fails to define employment uses and that DM3 switches to refer to commercial uses. These are not defined in the plan. They appear to be at odds with the definition used in PPS4 (para 4) which defined economic development as all B class uses, public and community uses and main town centre uses. It also refers to key indicators of what is an acceptable economic activity by reference to employment, wealth creation, economic outputs or products and includes retail, service and leisure uses.

PPS4 has key aims of encouraging economic prosperity, flexibility and vitality, competition and more sustainable patterns of development. These are not objectives served by resistance to embrace wider patterns of economic activity and changing trends in the space required.

It is concluded that policy CS2 and the resultant DM3 are flawed and should be recast to support the definition of economic activity in PPS4.

The policy should therefore, refer to accessible locations in or near to the identified town centre including well located employment areas.

**Policy CS6:** The wording of the policy is unclear as to what is intended. It appears in part to focus on regeneration (in the case of Havant) on the town centre, neglecting the importance of regeneration of the remainder of the urban area of Havant, particularly those areas that are in highly accessible locations close to the town centre, such as Solent Road (reference site BD16 in the Employment Land). It is as accessible as the Public Service Village allocation in terms of relationship to the town centre and main public transport routes and yet is not accorded any recognition in this policy approach, being treated on a par with outlying employment areas. There does not appear to be spatial recognition of the changing nature of employment or other uses that may be appropriate in accessible locations, in order to ensure future vitality of these areas, which have a key role in ensuring there are sufficient jobs, services, community uses and leisure opportunities to maintain and strengthen the role of Havant. As such, it is considered that the policy is not justified or effective.

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**Response to Question 2**

The Core Strategy seeks to safeguard existing employment sites in traditional B class uses from non employment uses. However, the policy does not embrace the range of economic activity that is advised in PPS4 and which is evidenced in the Employment Land Review (as evidenced above).

The policy should recognise that a large part of employment and economic prosperity occurs outside traditional B class uses. This includes sui generis, health, service, community, tourism, retail and other uses. Regeneration schemes in appropriately accessible locations should not be prevented or discouraged by a restrictive policy approach.

Many existing employment uses are outworn and in need of redevelopment for mixed use to meet market requirements. Flexibility is required to meet demand and optimise the potential for the delivery of new development. A wide view of economic uses is appropriate especially in highly accessible locations.

The policy at present appears ineffective, unjustified and potentially at odds with PPS4.

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**RETAIL**

**Policy CS4:** the policy identifies some 13,000m<sup>2</sup> of retail floorspace in the period to 2016 and the hierarchy of centres to which new development should be located.

In the absence of a review of the town centre boundary and in the absence of the Development Delivery DPD, it is not clear how the policy will be implemented. There appears to be a period where the provision cannot come forward in accordance with the plan. The role of wider retailing in the central area of Havant needs to be clarified as a context for future site allocations. The position is not justified at present and may be ineffective, with the potential for retail provision being directed to lower order centres before a proper assessment has been undertaken for Havant.