

**HAVANT BOROUGH COUNCIL**



**SUBMISSION CORE STRATEGY**

**PUBLIC EXAMINATION  
HEARING SESSION 3  
8 SEPTEMBER 2010 pm**

**STATEMENT 3**

**Employment**

## Question 7

### Will the Havant Borough Core Strategy (HBCS) provide adequate employment opportunities of the right type?

#### Overall Council Response

1. The Havant Borough Core Strategy (HBCS) seeks to provide local employment opportunities that are broadly of the right type, in the right place and at the right time without being unduly prescriptive or restrictive.
2. The HBCS sets the overarching economic growth objective of achieving Gross Value Added (GVA) growth of 3.5% per annum by 2026. This is in keeping with the aspirational growth target set by PUSH in its Economic Development Strategy (Core Document SD01/03). For the borough this vision translates into creating 3,776 new jobs up to 2016 and more up to 2026, 162,000 square metres of new employment floorspace up to 2026, a more highly skilled workforce, 13,000 square metres of new retail floorspace and an enhanced tourism offer.
3. Chapter 3 of the HBCS on Promoting Havant Borough's Economy includes strategic policies on employment, skills and employability, town centres and tourism. This joined up approach is consistent with PPS4: Planning for Sustainable Economic Growth and its definition of economic development. There are also a number of detailed and locally specific development management policies on economic development. The development of Dunsbury Hill Farm Strategic Site in close proximity to Leigh Park, which is one of the country's most socio-economically deprived communities, is considered critical to delivering the vision for economic growth in the borough. The successful implementation of all these policies will create jobs, improve skills and increase productivity and thus promote the borough's economy.
4. Policy CS2 sets out the employment floorspace requirements for the borough. These were apportioned from the now revoked South East Plan figure for South Hampshire of two million square metres of new employment floorspace. The employment floorspace targets for all the South Hampshire authorities are set out in the PUSH Employment Floorspace Policy Framework (SD01/05) and local analysis of this work is provided in stage 2 of the Havant Borough Employment Land Review (ELR) (SD09/08). The council considers the sub-regional and local evidence base on employment floorspace to be robust and credible. The panel who conducted the Examination in Public for the South East Plan commended the rigour and the transparency of the background work done in South Hampshire, which provided a clear audit trail between the floorspace figures and the GVA target. The government has confirmed that the evidence base for the newly revoked regional spatial strategies is valid evidence to be used in local development frameworks. The same employment land evidence was found sound in the adopted Southampton City and New Forest District Core Strategies.
5. An update and refresh of the evidence base underpinning the PUSH Economic Development Strategy is currently underway to take into account the impact of the recession and roll it forward to 2031. A draft Economic Development Strategy is currently out for consultation until 21 September 2010 and can be accessed on the PUSH website at <http://www.push.gov.uk/work/economic-development/economic-development-strategy/contributetosouthhampshire.htm>. The emerging PUSH vision is to create 51,200 new jobs, create an additional £1 billion in GVA and reduce the GVA per capita gap with the rest of the South East

from 11% to 7%. The HBCS objective of increasing GVA by 3.5% will contribute to the achievement of both the adopted and the emerging PUSH aspirations. The council considers this objective to be locally justified in order to address the highest unemployment figure in the county outside the cities at 3.3% rising to 5.9% in Leigh Park and the second lowest job density in the county at 0.67.

6. It is possible that the sub-regional floorspace requirements will be reduced in light of the evidence refresh. It is important to note that the refresh is being carried out at a sub-regional level and so has not focused in on local requirements. The refresh will be used to guide economic policies and not to prescriptively set requirements. If the refresh of the evidence base does result in a reduction to the local requirements this will be addressed through the allocation of employment sites in the Development Delivery (Allocations) DPD. An important strand of this work is the need to manage a portfolio of high quality employment sites such as Dunsbury Hill Farm.
7. Table 3.2 of the HBCS sets out the spatial distribution of new employment floorspace around the borough. These figures are purely indicative and seek to demonstrate that the employment requirements in policy CS2 are realistic. They also show the broad distribution of new businesses and jobs around the borough. The figures were prepared with a base date of April 2009 and an update to April 2010 will be provided prior to the hearing. Further updates will be reported in the Annual Monitoring Report (AMR).
8. Table 3.2 has been prepared in a similar way to the PUSH apportionment process taking into account completions since 2006, commitments in the planning pipeline, market demand and the aspiration to create a dynamic and diverse economy. It is important to note that the delivery of new employment floorspace will be assessed both locally and sub-regionally. This means that if there was a surplus or a shortfall in the borough this could be counterbalanced by delivery in another PUSH authority. This is being monitored and reported sub-regionally.
9. The five area profiles in the HBCS (pages 15-24) set the scene for business development in the borough. The profiles discuss the challenges and opportunities for these neighbourhoods and how they are addressed in the HBCS. Reasonable alternatives for the location of new employment land were discussed in the Draft Core Strategy (paragraphs 3.8-3.9) (SD03/01). Section 4 of the Sustainability Appraisal (SA) of the Core Strategy (SD04/11) sets out the options considered for employment and Appendix P of the SA is an options roadmap that explains the iterative process between the SA and the Core Strategy.
10. So that the HBCS can provide adequate employment opportunities of the right type in the borough it is essential to address the mismatch between local skills and local jobs in the borough. A key objective of the HBCS is to raise the skill levels and employability of the borough's current and potential workforce. Policy CS3 seeks to address barriers to local people accessing jobs, for example, by tackling skill shortages in marine businesses and providing childcare facilities close to employment sites. Skills training is listed as a type of infrastructure for which the Council will seek on-site provision or financial contributions under policy CS19. Work is also underway on a PUSH policy framework on training and skills. Skills provision will play an important part in Dunsbury Hill Farm delivering regeneration to Leigh Park where over 40% of the working age population do not have any qualifications.

## **General Response to the Comments Received on the Submission Version of the Core Strategy**

### **Site specific comments**

11. Representations were received on a number of sites that are not identified in the HBCS namely Scottish and Southern, Dances Way, Interbridges and Brockhampton West. All these sites were identified in the ELR and / or the SHLAA. The development of all these sites will be duly considered in the Development Delivery (Allocations) DPD.

### **Spatial Distribution Diagram**

12. A representation points out that the Spatial Distribution Diagram incorrectly uses the employment figures from the Draft Core Strategy and therefore are not the same as the figures set out in table 3.2 of the Submission version. This is a typographical error that is corrected in the Proposed Schedule of Changes (Change 35, Proposed Pre-Examination Schedule of Changes) and does not result in significant change. The representor is primarily concerned at the low level of employment provision on Hayling Island. Paragraph 3.13 of the HBSC states that the figures in table 3.2 are indicative and will not be used prescriptively to block business development on suitable locations around the borough including Hayling Island. The area profile for Hayling Island highlights several major constraints to business development namely access on and off the island, flooding and nature conservation designations. A major increase in the employment floorspace figures for Hayling Island would be contrary to the ELR and assessment of reasonable alternatives. This change would therefore make the HBCS unjustified

### **Previously developed land (PDL)**

13. A representation states that the HBCS is not consistent with national policy on prioritising PDL, because it includes the non-PDL site of Brockhampton West. This site is not identified in the Submission Core Strategy, although it did form a Strategic Site in the Draft Core Strategy. Paragraph 3.17 of the Core Strategy explains that although PDL will be prioritised for employment development the supply of PDL in the borough is insufficient to meet the floorspace requirements set in policy CS2. If PDL was not prioritised for development it would be inconsistent with national policy set out in PPS4 and thus make the Core Strategy unsound.

### **What is economic development?**

14. Representations were received that policy CS2 should seek to accommodate employment generating uses other than the traditional B uses. The floorspace requirements set out in policy CS2 do only relate to the B use classes as the locational requirements for these uses differ from other forms of economic development such as leisure and retail. The four economic development policies in chapter 3 are based on specific evidence based studies and whilst there is merit in looking at wider economic development there would be a significant issue expanding the employment requirements in policy CS2 to incorporate non-B uses because of inconsistency with the baseline studies. Requirements for new retail floorspace are set out in policy CS4 based on evidence provided in the Town centre, retail and leisure study. The Council will take a flexible approach to economic development and will encourage the creation of new jobs in the borough in all sectors of the economy.

## Question 8

**Is the policy for the protection of existing employment sites appropriate? Have the right sites been identified for protection?**

### Overall Council Response

15. In order to promote Havant Borough's economy and meet the challenges of a rapidly changing global economy it is appropriate to protect existing employment sites that are fit for purpose as well as provide new sites.
16. Criterion 5 of policy CS2 safeguards existing employment sites and requires all applications that would result in the loss of employment floorspace to comply with all aspects of the development management policy DM3.
17. Policy EC2 of PPS4 allows local planning authorities to safeguard land from other uses. Policy EC1 requires a local assessment of the existing and future supply of land for economic development. An updated and revised Employment Land Review (ELR) was produced in 2010 (SD09/08). This up-to-date and robust piece of work will be used to guide decisions on whether sites should be retained for employment purposes or released.
18. There are several reasons that justify the council's strong approach to protecting employment sites. Employment land is a key piece of physical economic infrastructure. Once it is redeveloped it cannot be replaced within the urban area. The protection of existing sites therefore protects local jobs, promotes social inclusion, reduces the need to travel and protects greenfield sites.
19. The employment floorspace figures in policy CS2 are net rather than gross. Therefore any loss of floorspace will necessitate an increase in the amount of floorspace built in the borough or the wider sub-region. This could include greenfield land.
20. Differences in land values particularly between employment and residential land make it essential to safeguard sites that are fit for purpose. Although residential re-development of existing employment sites can deliver new homes it is important that people who live in these homes can find employment locally. This is an important part of building a sustainable community.
21. It is not the intention of the Council to be overly restrictive on the redevelopment of existing employment sites. It is simply setting certain policy tests to ensure that existing sites that are fit for purpose are not lost to other uses. In order to provide further clarity the council proposes to amend Policy CS2 criterion 5 to emphasise the importance of 'fitness for purpose' as follows:  
  
'Safeguard existing employment sites and allocations *that are fit for purpose* from development proposals for non-employment uses.' (Change 2, Proposed Pre-Examination Schedule of Changes).
22. The policy approach set out in DM3 seeks to consolidate an informal approach that has been used by the council's development control team in conjunction with saved Local Plan policy EMP6 for over three years. The approach is applied early on in the pre-application stage and has been found to be both consistent and reasonable by developers and the council. The required marketing period creates a time for taking stock without creating development blight and ensures that employment uses are not lost on a whim.

23. Individual employment sites have not been identified for protection. Policy CS2 seeks to protect all sites that are fit for purpose. All applications that would result in the loss of employment floorspace will need to demonstrate through an active and exhaustive marketing exercise that the site is no longer fit for purpose as an employment site. This is a market led approach to employment protection rather than a prescriptive council led approach.
24. Criterion 6 of policy CS2 does treat the protection of marine businesses as a special case on waterfront locations. The borough's location on the Solent means that marine businesses form an important part of the local and sub-regional economy. Direct waterfront access is critical for some marine businesses and benefits accrue when specialised marine businesses are located together in a cluster. The ELR identified and assessed all the waterfront marine businesses in the borough and these will be allocated and protected as appropriate in the Development Delivery (Allocations) DPD.

### **General Response to the Comments Received on the Submission Version of the Core Strategy**

#### **Too restrictive**

25. A number of representors consider the HBCS approach to protecting employment sites to be overly restrictive. As explained previously it is not the council's intention to be overly restrictive in regard to redevelopment, but is simply setting certain policy tests in place. If the proposed changes were put in place as suggested by Scottish and Southern it would no longer be possible to safeguard sites that are fit for purpose and would put at risk the overarching objective of promoting Havant Borough's economy and achieving GVA growth of 3.5% by 2026.

#### **Supply of employment land**

26. A representation by Scottish and Southern states that table 1.37 of the ELR demonstrates that there is an over-supply of employment land and thus justifies a less restrictive approach to safeguarding employment sites. It appears that the representer calculated the figure by applying a standard plot ratio to the total potential land area of saved Local Plan policies and draft Development Delivery (Allocations) sites. This is incorrect as the potential figure shows the entire unseised supply demonstrating simple potential rather than suitability. Some sites such as an existing allotment site were not considered suitable for economic development. Some sites particularly town centre sites were suitable for a mixture of uses and so would not deliver the full quantum of employment floorspace. Some sites were subject to a number of constraints such as protected trees, which reduced the amount of deliverable floorspace. It is only through the production of the Development Delivery (Allocations) that the site specific quantum of employment development will be agreed.

#### **Non-conforming uses**

27. A number of representors considered that issues other than fitness for purpose should be considered such as bad neighbour uses. The ELR assessed all existing employment sites against a large number of criteria including neighbouring uses and these assessments will be duly considered by the council in change of use applications. It is not necessary to add a separate policy criterion on non-conforming uses.

**Small losses of employment land**

28. A number of representors consider that a small amount of floorspace should be lost where it allows for upgrading. While the policy CS2 seeks to minimise the loss of employment floorspace, the council will continue the pragmatic approach used in saved Local Plan policy EMP7. Therefore where a unit remains in employment use, but there are functional issues with the internal layout etc, then improvements and/or redevelopment that does not involve a significant loss of employment, is likely to be supported in principle.