

**STATEMENT PREPARED BY
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**REPRESENTATIONS IN RELATION TO
EMPLOYMENT POLICY CS2 AND POLICY DM3
EMPLOYMENT AND TOURISM SITES**

HEARING SESSION 3 - EMPLOYMENT

August 2010

1.0 INTRODUCTION

- 1.1 This statement amplifies the representations made to the Submission Core Strategy in relation to Employment Policies.
- 1.2 Specific objections were made to **Policy CS2** and **Policy DM3** and this statement addresses both representations.
- 1.3 The background to these representations is that Vail Williams act on behalf of BAE Systems who own a site known as The Systems Technology Park, a site of approximately 6.5ha containing over 26,000sqm of floor space within the Brambles Farm Industrial Estate to the north west of Waterlooville town centre. The principle building on this site is a former headquarters office containing nearly 20,000sqm of floorspace which, despite extensive marketing, is now largely vacant, dated and unsuited to modern occupiers' needs.

2.0 REPRESENTATIONS

Will the core strategy provide adequate employment opportunities of the right type?

- 2.1 The Preferred Options Core Strategy published in March 2008 included **Policy CS6 – Employment Land** which is attached as **Appendix 1**. The last paragraph of this policy recognised the need to “*safeguard and improve existing sites in employment use*” but also recognises “*that there may be opportunities for employment generating non-business uses and mixed use developments, as well as the transfer of sites to other uses.*”
- 2.2 This wording provided flexibility to allow alternative uses recognising the need in the draft policy to respond to differing economic circumstances.
- 2.3 The Draft Core Strategy published in June/July 2009 replaced **Policy CS6** with **Policy CS2**. The flexibility previously included was deleted and the policy became more restrictive, criterion 5 of Policy CS2 will “*safeguard existing employment sites and allocations from development proposals for non employment uses.*”
- 2.4 Policy CS2 of the Draft Core Strategy attracted a considerable number of objections, including those from Vail Williams, and was subject to modification including a commitment

to make reference to other uses within the supporting text which is now found in paragraph 3.08 and a revised objective to “promote and protect a dynamic, diverse and knowledge-based economy to meet the challenges of a rapidly changing global economy”. However, the flexibility in paragraph 3.08 is not reflected in the upper case policy and supporting only B uses does not promote a dynamic or diverse economy.

- 2.5 The approach of Policy CS2 is considered inconsistent with PPS4. Paragraph 4 of PPS4 explains that “economic development” is more than just traditional B use classes and includes a much wider range including other development which provides employment opportunities, generates wealth, or produces or generates an economic output or product. We consider that the Core Strategy should be amended to reflect this approach.
- 2.6 This widened definition of employment development and increasing importance it plays in the economy is recognised in the DTZ Employment Land Review. For example figures 1.2 and 1.7 indicate the sectors which have experienced employment growth which include education and health, hotels and catering and retail. This growth far exceeds that experienced by traditional B use classes. Sectors identified as having the greatest employment decline include electronics, metals & engineering and transport equipment which, being associated with industry, can be land hungry uses. Paragraphs 1.36 is clear that, “a large proportion of employment growth is in non-B employment sectors”.
- 2.7 It is of note that figure 2.9 contained within the Havant Borough Employment Land Review (February 2010) indicates that the second largest net additional floor space/land take requirement for South Hampshire is in the retail and leisure sector for which sites will be required. Moreover, paragraph 3.12 of the same document indicates that over 18 per cent of office floor space could be classified as surplus vacant property, particularly those sites that contain dated office buildings of poor quality and unsuited to modern occupier needs possibly because they are suited to large corporate occupiers rather than smaller occupiers. The BAE site at Waterlooville and the significant former headquarters building it contains is a prime example of this issue.
- 2.8 The policy at present is therefore out of step with current national employment policy. It appears to protect every existing and proposed employment site for just B class uses. These sites are not identified on the Core Strategy Proposals Map, nor is there any hierarchy proposed which would protect, for example, those of strategic importance compared with those of lesser importance which may require less or no protection. The

policy is simply a blanket protection to all sites in B1, B2 and B8 use and would prevent other PPS4 “economic development” uses and therefore frustrate economic growth, job diversity and regeneration potential. Flexibility to enable investment in a range of job creating uses should be the underlying material consideration.

Changes Sought

- 2.9 The Core Strategy should define employment to include both B use classes and those set out in paragraph 4 of PPS4.
- 2.10 Policy CS2 should clarify whether it refers to all employment sites or whether it is only those considered of strategic importance, this should in turn be referred to a plan identifying the boundaries of those sites.
- 2.11 The policy provides no hierarchy in terms of whether certain sites are more important than others.
- 2.12 Criterion 5 of policy CS2 should be replaced with –
- *Safeguard and improve existing sites in employment use and sites allocated for employment development.*
- 2.13 The wording of **Policy CS6** of the March 2008 Preferred Options set out in paragraph 2.1 above should be reinstated in the text of the policy as follows:

“Proposals to redevelop existing employment floorspace will be considered on a case by case basis. There may be opportunities for employment generating non-business uses and mixed use developments, as well as the transfer of sites to other uses. In each case it will be important that the changes proposed do not undermine the role of the key areas of business activity in the Borough.”

Is the policy for the protection of existing employment sites appropriate?

- 2.14 **Policy DM3** seeks to protect all land or premises currently or last used for B use class employment purposes unless they are “financially unviable”. However, this is considered an unacceptably narrow test, for example many sites may be unsuited to employment

development because they are unsuitably located, perhaps in close proximity to residential properties, subject to poor access or otherwise inappropriately located in sustainability terms. The benefits of removing an un-neighbourly employment use and replacing it with a more suitable neighbour is not contemplated by the policy.

- 2.15 The second paragraph of **Policy DM3** indicates that when a site is “no longer suitable for B use class employment other commercial uses should be considered in the first instance.”
- 2.16 The first point to note is that the text in this paragraph refers to “suitable” rather than “financially unviable” in contrast to the test set out in the first paragraph. This is confusing and supports our argument above that many sites may be unsuited to continued employment use.
- 2.17 Moreover, the policy then indicates that other “commercial” uses should be considered in the first instance. What constitutes a “commercial use” is not defined. It is assumed that the range of other “commercial” uses would include those identified in paragraph 3.08 of Policy CS2, that is to say leisure, retail, tourism. If that is the intention then it should be clarified in the text of the policy.
- 2.18 The marketing period set out in **Policy DM3** is considered unacceptable. A period of 18 months is required for major sites and 12 months for other sites. No justification is provided as to why such an extensive marketing period is required, especially in the case of a major site. **Policy EMP6** of the current Adopted Local Plan specifies a 12 month period and no justification is provided to deviate from this period.
- 2.19 It is also of relevance to note that a marketing period of 6 months in the case of a local shop and 12 months in the case of a community facility is set out in **Policy DM2** immediately proceeding Policy DM3.
- 2.20 The 18 month marketing period is considered too onerous and has not been justified. What planning purpose is served by leaving buildings empty for such a long period? Even more concerning is the sentence in paragraph 10.08 that “in certain circumstances the marketing period may be extended”; this is without any explanation or justification and should be deleted.

2.21 The policy should also include an additional criteria indicating that:-

“the loss of a proportion of floor space to a non employment use will be considered acceptable where this would lead to a significant upgrade of the remaining employment floor space on the site.”

2.22 Such wording would allow the retention and potential upgrading of the existing employment floor space and “kick start” redevelopment of part of the site for an alternative non employment use which could bring about wider economic social and environmental benefits for the community. For example, allowing commercial, leisure tourism or Sui Generis uses (e.g.. car showroom) on a large employment site may mean that the remainder can be redeveloped more efficiently for employment purposes, perhaps providing modern and better quality employment units of a more appropriate size, which in tandem with the supporting development would provide a diverse range of jobs and also potentially regenerate the surrounding area.

Have the right sites been identified for protection?

2.23 It is unclear which sites are to be protected; currently policies CS2 and DM3 protect all land currently or last used for B use class employment purposes. However, certain sites will be more suited to continued employment use whereas others will be inappropriately located and may offer the opportunity for alternative uses.

2.24 The Core Strategy could envisage a hierarchy of sites, perhaps those of strategic importance being protected with those of lesser importance being allowed some flexibility of uses.

2.25 The wording, at present, would simply place a blanket protection on all employment sites preventing any alternative employment generating proposals unless stringent and onerous marketing tests are met. This blanket protection has the strong potential to stifle development leaving sites vacant for considerable periods of time when they could be providing economic benefits

2.26 The policy should therefore make it clear which sites are protected by reference to a schedule, plan or if sites are to be identified in a Development Plan Document.