



GOVERNMENT OFFICE
FOR THE SOUTH EAST

Matter 8Bi / South Hampshire: Strategy & Economy

Government Office for the South East of England (7447)

Draft RSS for The South East of England -The South East Plan
Examination in Public - November 2006 to March 2007
Written Statement on behalf of HM Government - December 2006

8Bi.1 Does the sub-regional strategy provide a positive steer that will achieve the proposed increase in GVA of 3.5% per annum, while taking account of the environmental assets of South Hampshire and its surroundings?

1. We have outlined our concerns regarding the possible need for a stronger economic steer post 2016 in our statement on matter 1G.
2. In order to support their ambitions for growth whilst retaining their environmental assets, the Government has agreed and accepted the PUSH sub-region's case for New Growth Point status. This status recognises that it is vital that new homes are built alongside jobs growth and infrastructure investment in order to deliver sustainable communities for the future. That is why, alongside other measures on planning, affordable housing and infrastructure funding, we invited local authorities and partners to put forward proposals for new homes as part of sustainable growth. Following a review of all the New Growth Point proposals across government and in particular in consultation with DEFRA and DfT and their Agencies, we felt able to include the PUSH sub-region in the announcement.
3. New Growth Point status means that Government and local partners agree the potential for growth, and are committed to working together to ensure that growth will be sustainable, realistic and affordable.
4. We suggest that the Panel should consider if there is sufficient consistency between the approach by the Regional Assembly and the approach promoted by SEEDA through the Regional Economic Strategy. Our statement on Sub Matter 1G makes clear that the RSS should complement and implement the RES.

8Bi.2 Is there sufficient guidance about what action needs to be taken by LPAs to assist the achievement of this GVA growth rate, in term of identification of employment land and of priorities for employment sites?

1. We commend the work done by the PUSH authorities in identifying the key issues they need to address in order to achieve higher rates of economic growth.
2. The Panel may wish to consider testing the evidence base, in particular how far the figures set out in SH6 and the types of land use proposed will contribute to a 3.5% per annum GVA growth.

3. The identification of employment land in terms of preferred locations and the priority for employment sites in terms of how much floorspace is to be provided is set out in Policy SH6, and office floorspace figures are proposed by PUSH for inclusion within the revised text accompanying Policy SH8. The Panel may wish to consider whether the figures are being provided as requested by PPS6 (paragraph 2.13), which asks for regional and where appropriate, sub-regional centres to be identified where major growth should be encouraged. As the South East plan has provided figures for the sub-region overall, the Panel may wish to consider whether it is sufficiently clear which major centres have been identified for growth, which would inform the relevant DPDs.
4. It is also suggested that the Panel note the priority for the location of office development set out in Policy SH6 and question whether it fully accords with PPS6, in that policy SH6 seeks to locate offices in cities and towns, "particularly their centres". PPS6 makes clear that its policy application applies to offices and that in applying the sequential test, locations in existing centres should be the first choice (paragraphs 1.8, 2.44).
5. The proposed PUSH revision to Policy SH6 seeks to omit the reference to "particularly their centres". In doing so, the Panel may wish to seek clarification in regard to offices, that the sequential test set out in PPS6 will be applied.
6. We also refer the Panel to our comments in response to question 8Bi.4 regarding the location of offices.

8Bi.3 Does the proposed strategy adequately reflect the role and potential of Southampton and Portsmouth, including Southampton Airport and Southampton Port?

1. The draft Regional Transport Strategy Map T2 identifies Southampton and Portsmouth as Regional Hubs, and Southampton Airport and Southampton Port as International Gateways.
2. Specific concerns with policies relating to ports and airports was spelt out in Government's response to Matter 3 (specifically retention of existing RTS policy relating to airport operator master plans, and forthcoming ports policy review).
3. The Panel may wish to consider whether the Eddington Report to Government, which makes recommendations about the importance of access to international gateways, and about strategic transport planning for growing urban areas, raises issues which should be considered.

8Bi.4 Is there sufficient focus on the needs and potential of the city centres? Are the proposals for office development appropriate and properly justified, having regard to the guidance in PPS6 (Policy SH8). (Note that a revised form of Policy SH8 is given in the PUSH rep 7138).

1. It is suggested that the Panel give consideration to testing whether the evidence base supports the approach to town centres (including the designation of new town centres in the PUSH revision to Policy SH8), and that national policy set out in PPS6 (in particular that in paragraph 2.13) has also been taken into account.
2. The PUSH revision to Policy SH8 refers to "a proactive programme of high quality mixed-use development". The Panel may wish to clarify which

parties are expected to deliver this. PPS11 (paragraph 1.18) states that RSS should make clear if policies are to be delivered through LDDs or through other means as agreed with the bodies concerned.

3. In terms of focusing on the needs and potential of centres, we note the reference to a “network of local centres” (PUSH proposed revision to SH8 accompanying text). The Panel could explore whether this level of detail goes beyond the advice set out in PPS6 (paragraph 2.12) which refers to higher level centres and development of more than local importance. We refer to our statement on 8Bi.2.
4. The Panel may also wish to clarify why a D2 Leisure use floorspace figure is not provided, as it is noted that reference is made to major leisure uses in the PUSH area (PUSH proposed revision to SH8 accompanying text). It is not clear if consideration was given to the advice in PPS6 (paragraph 2.13) which refers to assessing in broad terms leisure needs over the RSS timeframe. We note the inclusion of floorspace figures for A3/A4/A5 uses (food and drink) but question whether providing figures for these uses accords with the PPS6 definition of “major leisure development” (PPS6 paragraph 2.12).
5. The PUSH proposed revision to SH8 accompanying text refers to “additional opportunities”, which infers in addition to the floorspace figures set out in the table. The Panel may wish to consider how this approach impacts on the needs and potential of the city and town centres.
6. In addressing the needs and potential of the city centres, the Panel may wish to consider the PUSH revision to Policy SH8 which addresses new centres and out of centre development, and the evidence base which underpins this policy approach, in particular the proposed intensification and designation of Gun Wharf Quays as a town centre in the context of PPS6 (Annex A). We also note that Gunwharf Quays does not appear in Policy TC2. If the Panel conclude that Gunwharf Quays is an out of centre retail development, we would question whether intensification at this centre would be consistent with Policy TC4.
7. In addition, the Panel may wish to clarify the status of the two new centres proposed in the strategic development areas, which are not to have full town centre status but then are also referred to as district centres. If it is concluded that the two new centres are not town centres, we would question how these centres would function and how they would relate to the growth in housing. If the conclusion is that they are town centres, we suggest that the impact on adjoining centres be considered.
8. In terms of offices, we note the reference to the new centres serving a wider sub-regional role, and suggest that the Panel consider whether this approach accords with PPG13. If the Panel conclude the new centres are appropriate as district centres, we would expect office development to be in scale with this designation (PPS6 paragraph 2.41).
9. Finally, it is suggested that the Panel consider whether the out of centre wording in the Policy SH8 PUSH revision is appropriate in the context of national policy set out in PPS6. Need must be demonstrated for edge of centre and out of centre applications if the development plan is not up to date (PPS6 paragraph 3.9). In addition, local planning authorities should review all existing allocations and reallocate sites which do not comply with PPS6 (PPS6, paragraph 2.16).

10. With regards to office development, we are not in a position to comment on whether the proposals for office development are appropriate and properly justified. However, we will want to be assured that PPS6 was taken into account in formulating Policy SH8 and the proposed PUSH revision.
11. In particular, we suggest that the Panel give consideration to re-wording Policy SH8, in order to accord with the advice set out in PPS6 (paragraph 2.28) on site selection and land assembly for development plan documents. The policy currently reads as though PPS6 (paragraph 2.28) will not be taken into account in allocating office sites within development plan documents.
12. We note that the PUSH proposed revision to SH8 accompanying text refers to the sequential approach but question whether PPS6 (paragraph 2.28) has been adequately covered in the revision, as this also refers to need, scale, etc.
13. Finally, for clarity, the Panel may wish to consider if the revision to Policy SH8 regarding the office floorspace figures accords with the office floorspace figures set out in Policy SH6.