

For EBC use only
Respondent no:
Representation no:

Draft Eastleigh Borough Local Plan 2011-2029

Consultation 28 October 2011 – 3 January 2012

Consultation form

Please use a separate form for each policy or paragraph of the draft local plan you wish to comment on.

Your address/ other contact details will be treated as confidential. However, please note that your name and your comments will be open to view by the general public.

Who is making this representation?

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Agent (if any)

Name:.....

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E-mail:.....

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What do you wish to object to/ support?

Please give the policy or paragraph number from the draft Local Plan

Paragraph/ policy no: PLEASE SEE 3-PAGE TEXT RESPONSE ATTACHED AND TABLE OF POLICIES.

Object or Support?. OBJECT AND SUPPORT

What are the reasons for your objection/ support?

Please explain your reasons, including any change to the local plan you would like to see (attach further sheets if necessary)

PLEASE SEE TEXT RESPONSE ATTACHED

We will acknowledge receipt of your comments.

Do you wish to be notified of the next stage of this plan? YES Y N

Please return this form by 3 January 2012

You can e-mail it to:

localplan@eastleigh.gov.uk

Or return it to: Eastleigh Borough Council, Planning Policy & Design, Civic Offices, Leigh Road, Eastleigh, SO50 9YN

HAMPSHIRE CHAMBER OF COMMERCE RESPONSE

ON THE DRAFT EASTLEIGH LOCAL PLAN CONSULTATION

AFTER PRESENTATION BY EASTLEIGH COUNCIL - JANUARY 2012

The Chamber is grateful for the opportunity to comment and has been greatly helped in understanding the Local Plan by the presentation given by Tony Wright and Kathryn Rankin at its Planning and Transport committee meeting on 4th January 2012 and a Chamber Eastleigh sub-group meeting was also held to draft the response.

The Chamber of Commerce is a membership organisation with members from every sector of the business community across Hampshire, which enables it to represent the views of local businesses on local matters, as well as on a regional and national basis.

The interests of the Chamber are to promote a thriving economy. What it looks for in planning policies is the recognition of the varying needs of the economy and local businesses. These needs include land for expansion, for modernisation, to replace premises where land is zoned for other uses, and land for new firms coming into the area. On the other hand, the Chamber seeks to avoid constraints to business development from policies which may not be necessary or are too onerous or costly. While the need for environmental and sustainability principles is fully accepted, the Chamber is concerned to ensure that these should not be too costly or over bureaucratic or duplicate other controls. In this respect we believe the contributions required from developers have now reached the point where desirable development is being made uneconomic.

The Chamber welcomes the aspirations to make provision for firms, to improve the quality of jobs etc. However, it has major concerns about the Local Plan proposals, in particular:-

1. The heavy reliance on Riverside which is acknowledged to be expensive and uncertain.
2. The loss of a significant number of major employment sites to housing.
3. The lack of allocations to make up the loss of employment land.
4. The reduction in employment land
5. The conflict between the Airport's aspirations for its land in the NE sector and that of the Local Plan.
6. The lack of alternative provision for firms displaced at Riverside or elsewhere in the Borough.

The Chamber considers the Eastleigh Local Plan strategy is in conflict with the Government's policy of encouraging economic growth. We believe it would be sensible for the Plan to take into account the needs of both the Eastleigh and Southampton business communities with a view to encouraging growth in the sub-regional economy.

The Chamber understands that this draft Local Plan has been put forward before three key studies have been prepared. These are:

- Employment Land Review
- Transport Plan
- Sustainability Plan

Of these the most important is the Employment Land review (cf EBLP para 2.29.) Without this information, the Chamber considers that the policies and proposals of the plan for the economy are unsound as they lack an appropriate evidence base.

The Local Plan no longer has the benefit of the South East Plan to underpin its proposals; it is not clear whether the extensive evidence base assembled for the SE Plan has been used, nor whether the Local Plan adopts the economic policies of the SE Plan as its starting point.

The Chamber notes the "duty to cooperate" imposed on Local Planning Authorities and considers this to be vital in the case of any plan for the Eastleigh economy. The Local Plan acknowledges, again in para 2.29: "the Borough's economy .. is inextricably linked to that of Southampton and the South Hampshire sub-region". However, there is little evidence of the level of cooperation to satisfy the Borough Council's duty.

The Chamber notes the general reliance on PUSH for a wider view of strategic matters. However, the Chamber notes that PUSH is revising and updating the spatial aspects of its economic plan in partnership with Solent LEP. This too is a vital input.

The Chamber considers that the Borough Council should revise its policies and proposals for the economy after publication of the three studies referred to above and the Chamber requests that it is included in consultation on these revised proposals.

While the focus of the Chamber is on the needs of business sectors and individual companies, the focus of this plan appears to be provision of employment. The Chamber's view is that jobs are created by businesses, not by the Local Plan; it is business and its land use needs for which the planning system must make provision. Our wish is that the plan should focus first and foremost on the needs of businesses, with the growth of business and employment provision as a consequence. An example is the logistics, storage and distribution industry for which there is a severe shortage of quality industrial/warehouse units.

The Chamber recommends that the Council, in carrying out its revisions, takes into account the following points:

1. The economic policies of the Eastleigh Local Plan need to be placed within the overall spatial framework for South Hampshire and in cooperation with neighbouring local authorities, PUSH and Solent LEP.

2. Riverside should be discounted as making provision towards Eastleigh's employment needs in the short to medium term and other uses of those areas should be considered. There are numerous uncertainties and exceptionally high infrastructure costs, in particular that of the Chickenhall Lane Link Road which is a project we cannot rely on being delivered.
3. Additional provision of land should be made for firms:
 - a. Displaced at Riverside and in other parts of the Borough
 - b. To replace land zoned for housing at Riverside and elsewhere in the Borough
 - c. For general growth of Eastleigh and Southampton firms in specific sectors with special needs. Sites with potential to attract high value prestige firms such as Stoneham Lane should be identified and given priority over housing allocations. The Chamber would like to suggest a SHLAA approach as with housing is used to establish the definition of land for business.
4. The land north east of the Airport should be made available for Airport use.
5. Hampshire Chamber is willing to work with the Council to help develop an economic spatial strategy for Eastleigh's Local Plan.
6. The use of gaps: The Chamber understands the longstanding policy, but questions whether EBC's aspirations for higher quality employment can be achieved without the use of more gap land for employment. This point was raised at EBC's workshop 4 October on meeting Eastleigh's employment land needs, where it was proposed that the playing fields on Wide Lane should be considered for a business park with good transport links and the fields relocated at Eastleigh Riverside. The Chamber notes that EBC has made major alterations to gap boundaries both in this plan and over the last 3 years without undermining the policy. This supports the Chamber's attitude to gaps.

The points outlined in this statement would result in changes to many of the economic policies and proposals, for example:

G1	Gaps	Assess. This land is key to raising job quality, because of its attractions for key firms.
P2	Eastleigh Riverside	Over reliance on its implementation
P4	Re-zoning of Employment Land for Housing	Need for alternative provision is made
P9	Eastleigh Town Centre	Unlikely to attract high quality office etc. Should not be used to block alternative provision.

BL7, 8, 9 & BO2	Housing around Hedge End and Botley	No matching employment
S5	New Employment	Inadequate provision of additional land. Over reliance on Riverside and Eastleigh Town centre
S8	Southampton Airport	Should be encouraged to use land in NE sector for airside uses.

Examples of policies and proposals supported by the Chamber include P1, P3, CF1 and AL2 and those relating to the marine industries.

These are examples only and are not exhaustive.