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CONSULTATION RESPONSE FROM HAMPSHIRE CHAMBER OF COMMERCE ON THE EMERGING EASTLEIGH BOROUGH LOCAL PLAN 2011 - 2036

FIRST STAGE – ISSUES AND OPTIONS CONSULTATION ENDING 17 FEBRUARY 2016

Hampshire Chamber of Commerce is the Independent Voice of Local Business across the county and is one of the largest business representational groups in the UK. It brings together the combined influence, expertise and business support of the county's three former major Chambers of Commerce. This substantial business network engages businesses of all sizes and in all sectors, whether throughout Hampshire, or in local groupings as and when required to focus on the areas of Solent LEP, Enterprise M3 LEP, South Hampshire, the New Forest, North or East Hampshire, or the city regions of Portsmouth, Southampton, Winchester and main towns such as Aldershot, Andover, Basingstoke, Eastleigh, Fareham, Farnborough, Fleet, Gosport, Havant.

Hampshire Chamber would like to submit the following views on the emerging Eastleigh Borough Local Plan, based on a presentation by Eastleigh Borough Council and discussion at the February meetings of the Chamber's Eastleigh Area Committee and Planning & Transport Committee.

A. THE CURRENT CONSULTATION AND ITS CONTEXT

1. The emerging Eastleigh Local Plan is wide in focus and proposes eight options for housing and employment provision. It looks to the refresh of the PUSH Spatial Strategy to give it a lead, but the draft update of the PUSH strategy has not been published yet, or shared with the LEP or others. So there has been little independent business input or evidence to the new EBC Local Plan. The Solent LEP has itself identified South Hampshire as an underperforming region in economic terms and Hampshire Chamber has reservations about the current PUSH strategy. Radical changes will need to be made to PUSH's current economic policies to increase productivity and support innovation and enterprise. These changes are bound to impact on Eastleigh as a centre of employment.
2. The current consultation by Eastleigh Borough Council on its new, emerging Local Plan is therefore considered premature by Hampshire Chamber. Before anyone can properly respond, there needs to be the top down guidance. The consultation should be held over until the PUSH strategy is settled, after which the consultation document can then be rewritten to take account of the PUSH strategy update, rather than remain a very high level consultation in advance of the more specific PUSH Strategy draft update.
3. To ensure the best deal and consistency of housing and commercial provision are available for Eastleigh, there needs to be clear links between the strategies of PUSH, Solent LEP, Solent Transport and local government – possibly soon to be in the form of a combined local authority for Hampshire and the Isle of Wight. Full duties to co-operate with neighbouring authorities are required to meet current and future demands together.
4. There also needs to be a much fuller analysis of the reasons for the underperformance of South Hampshire and the degree to which planning policies have contributed to this. It is not



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enough to be satisfied with Eastleigh meeting its PUSH growth targets, but rather we should look at comparisons with other cities and sub regions of the country. Figures on employment land should take account of demolitions and losses to other uses such as flats, student accommodation and other housing.

B CITY LED APPROACH

1. The current PUSH strategy has a city led approach to new development which was adopted as a policy decision, rather than an economic one. This policy was the supposed driver of city refurbishment, which was to be the main location of employment growth so as to maximise the use of public transport. As a result the other councils in the PUSH strategy did not have to allocate so much commercial or industrial land in their plans.
2. However, this policy simply has not happened. In fact, there has been net loss of city offices and key office sites, mainly to student housing. There is also a lack of high specification office space which needs to be addressed to attract more inward investment, but prime office rental in Southampton is below construction costs and is not expected to change soon.
3. It is now widely accepted that provision of office development in the adopted Southampton Local Plan was very ambitious and that it would be fantasy to continue with this in the current plan. This situation has very far reaching consequences for the economic strategy for South Hampshire and should be flagged as such in the consultations on Local Plans by other local authorities in South Hampshire.

C LACK OF EMPLOYMENT LAND PROVISION

1. One element which the Chamber has referred to consistently in its responses to local plans is the lack of land to replace the many sites lost to housing. The right land is needed and in the right places to allow for expansion of local firms and inward investment. In the Chamber's view, rectifying this situation cannot be left to PUSH, a local authority body over which the business community has little influence.
2. In terms of development briefs, we would of course wish to ensure as much land as possible is kept available for commercial usage, rather than being used for housing, and more especially so in Eastleigh with its connections to the M3 and M27 motorway nearby.
3. We need to see more clarity on changes in population growth by sector (residents, commuters, students, retirees, second homes, whole life homes, age bands etc) with special understanding of catering for an ageing population and all its needs.
4. We would like to recommend mention in the Plan of industrial clusters/sectors identified by LEP as growth areas, or how to plan for their growth, eg. logistics, advanced materials and composites, oil and gas, construction and rail.

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D TRANSPORT AND INFRASTRUCTURE

- 1 There needs to be close links between the planning objectives of the Local Plan with a co-ordinated and sustainable Local Transport Plan. There is a need to ensure the two are bold, co-ordinated and fully multi-modal to ensure there is enough provision and capacity to allow environmentally friendly and sustainable access throughout the area.
- 2 We would wish to see all development meeting air quality, low carbon and energy efficient BREEAM excellent standards.
- 3 Every opportunity should be looked at to increase the use of rail for public transport with particular reference to a new rail route Portsmouth, Eastleigh, through to Botley.
- 4 The local plan needs to promote measures to reduce car use by locating new housing and commercial development close to good quality public transport, cycle and pedestrian links and the facilities residents and users require, or in places where such links can be provided.
- 5 The local plan should seek to improve the public transport offer in long term revenue and capital investments within and around the new developments.
- 6 There is an opportunity to provide an important improved road link from J9 on the M27 to the M3 at Allbrook by joining up several pieces of planned road improvements (Option A) and new road (Whiteley road linking J9 to Curbridge) to make one stretch of road that would avoid J5/M27 Airport and ease congestion on motorways used as local roads. Also this new link road would mean all HGV traffic could miss Eastleigh town. (Sketch attached)

SUMMARY

- a) Like the Southampton Local Plan, the Eastleigh Local Plan is also premature. Eastleigh Council needs to work together more with other local authorities and agencies like Highways England and PUSH.
- b) There is a fundamental flaw in PUSH's current strategy based on the "cities first" approach which should be addressed in the current emerging local plans in the PUSH area.
- c) There is very little employment land in the Plan, considering that Eastleigh Riverside land should not be relied on.
- d) There needs to be close links between the planning objectives of the Local Plan with a co-ordinated and sustainable Local Transport Plan, so as to seek to improve the public transport offer and promote measures to reduce car use.

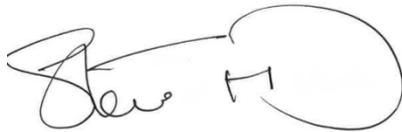
The Chamber wishes to be assured that:

1. The Chamber's previous four representations on this plan will still be taken into account
2. The commercial land released in the draft plan will continue to be allocated.
3. The conclusions of the current logistics study by Solent LEP will be fully taken into account.
4. The economic issues will be given proper prominence in future versions of this plan.

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Finally, Hampshire Chamber would like to stress again its concern about the timing of this consultation being ahead of the publication of the PUSH strategy draft update. A premature consultation such as this devalues the whole process when there are good reasons to hold over the process, such as the prospect of reorganisation with pending devolution proposals put to government, as well as the imminent publication of the PUSH draft update.

Hampshire Chamber of Commerce would like to thank Eastleigh Borough Council for the presentation on this vital stage of planning for the future of Eastleigh Borough. The opportunity to give detailed input to the Local Plan at this early stage is appreciated and we look forward to further involvement, in particular on the forthcoming Eastleigh Employment Sites Study.



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