

	Southampton City Council Response
<b>Day 1 Action</b>	
<p>1. Clarify our various numerical targets for housing, office, retail, etc – are they approx ranges, minima or maxima?</p>	<p><b>Offices</b>  The office targets are set by the PUSH policy framework for employment floorspace (CD71). This document explains, at paragraph 4.2, that the office targets for Southampton are a minimum.</p> <p>This should be reflected in the core strategy where it refers to the office targets, at:</p> <ul style="list-style-type: none"> <li>• Policies CS1, CS6, CS8</li> <li>• Paragraphs 3.2.1, 4.3.1, 4.6.3, 4.6.11, 4.6.12, and 7.2.5.</li> <li>• The monitoring table</li> </ul> <p>(For clarity the reference should be to “a minimum of”, deleting references to “approximately”).</p> <p><b>Industrial / Warehouse</b>  The industrial and warehouse targets are set by the PUSH policy framework for employment floorspace (CD71). The Council considers the targets to be approximate. This is because CD71 explains that whilst each Council is expected to meet the targets, performance will be monitored and managed at the sub regional level (CD71, paragraphs 4.1, 7.2). This is also stated in the South East Plan (CD51, paragraph 16.12).</p> <p>The core strategy refers to these targets as approximate in policy CS6 and paragraph 7.2.6. (The representation from PUSH supported policy CS6, explaining the targets were consistent with the PUSH framework).</p> <p>However the core strategy should also refer to the targets as approximate at:</p> <ul style="list-style-type: none"> <li>• Paragraphs 3.2.1, 4.3.1, and 4.6.3.</li> </ul>

	<ul style="list-style-type: none"> <li>• The monitoring table.</li> </ul> <p><b>Retail</b> The retail targets are set out in policies CS1 and CS2 as a range. The specific targets for Southampton are underpinned by evidence produced by DTZ.</p> <p>The Council considers that to be consistent with PPS6 and the South East Plan, the targets should be regarded as approximate or broad guidelines, and be subject to ongoing monitoring.</p> <p>The approximate nature of these targets is already recognised in policy CS1, at paragraphs 4.4.6, 4.4.15 and 7.2.8, and in the monitoring table.</p> <p>This should also be stated at paragraphs 3.2.1 and 4.3.1.</p> <p>The A3 – A5 targets are at least 20,000 – 30,000 sq m. (They equate to the lower end of a range set out in the DTZ 2005 report). This is correctly stated at paragraphs 4.3.1 and 4.4.6.</p>
<p>2. Clarify why the MDQ boundary extends onto operational port land – do we wish to propose any revisions to that?</p>	<p>The city centre boundary should extend into two parts of the operational port land as indicated on the proposals map. However the MDQ area should not be shown to extend into the operational port land. It should stop to the north (map attached).</p>
<p>3. Check our reaction to NFDC Core Strategy changes (re Dibden Bay). What's our view on the changes? Do we want to cross-ref to the revised NFDC Core Strategy approach re Dibden Bay in our port policy?</p>	<p>Suggested Changes to paragraph 4.6.15. The penultimate sentence should be further amended as follows: “The longer term ability for the port to grow will relate to land and sites outside the city’s boundary, <u>specifically Dibden Bay (see the New Forest District Council Core Strategy and regional and national policy).</u>”</p>

<p>4. Provide a brief note on our reaction to draft PPS4 – are there any implications for our approach?</p>	<p>A note on draft PPS4 and the Southampton core strategy in relation to employment</p> <p>The existing policy framework (including PPG4, PPS1, PPG13, the South East Plan and the Regional Economic Strategy) promote economic growth and competitiveness, social inclusion, urban regeneration, sustainable and accessible development.</p> <p>Draft PPS4 continues these themes and also provides new points of emphasis. Specifically it:</p> <ol style="list-style-type: none"> <li>1. Seeks that plans can provide a quick response to changing circumstances, and incorporate a flexible approach;</li> <li>2. Promotes positive and pro-active planning for economic growth (based on sustainable development). For example, it supports existing clusters and the need for businesses to co-locate; and new / emerging sectors (eg the low carbon economy).</li> <li>3. Requires the regional spatial strategy to set employment development targets for districts.</li> <li>4. Advises local planning authorities to prioritise the re-use of previously developed land, support new working practices (eg working from home), and to provide a range of business sites. Employment land should be safeguarded where necessary (where there is a need or prospect of take up). Otherwise wider economic uses or housing should be considered.</li> <li>5. Planning applications for economic development should be considered favourably unless the costs clearly outweigh the benefits (taking into account economic, environmental and social factors, including any long</li> </ol>
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	<p>term economic benefits).</p> <p>The core strategy is considered to be consistent with this approach:</p> <ol style="list-style-type: none"> <li>1. It is based on the RSS which has planned positively for a significant increase in economic growth in South Hampshire, and has set the employment development targets to achieve this (which have been apportioned to individual districts and incorporated in the core strategy).</li> <li>2. It clearly establishes the objectives of economic growth and competitiveness.</li> <li>3. It has, in the suggested changes, explicitly recognised the importance of key sectors; and is based on background evidence regarding these sectors (specifically the marine and distribution / logistics sectors).</li> <li>4. Focuses on urban development.</li> <li>5. Seeks to safeguard employment land to provide a range of sites in the urban area, unless there are strong reasons not to do so.</li> </ol>
<p>5. Clarify our vision for employment/regeneration in each part of the city (for the Employment day)</p>	<p>See below</p>
<p>6. Consider amendments to CS21/CS22 and para 5.6.5 re development contributions – noting that they may need to be spent outside our area</p>	<p>Policy CS21 add in as follows: The council will seek to retain the quantity and improve the quality and accessibility of the city’s diverse and multi-functional open spaces <i>and help deliver new open space both within and beyond the city</i> to meet the needs of all age groups through....</p>

	Amend table following 5.6.5 (page 68) to add in reference to policy CS 22 (in addition to CS21) in connection with open space and leisure and cultural facilities
7. Comment on the suggested EA/GOSE amendment to Strategic Objective S20, adding 'avoid' and referring directly to the city centre	<p>Flood Risk</p> <p>Strategic Objectives – S20</p> <p>The Council can accept an amendment to S20 to include the “avoid” aspect of the flood risk hierarchy. Incorporating the suggested changes in CD73 aswell, S20 would read:</p> <p>“Adopt an ‘avoid, reduce and mitigate’ approach to flooding to achieve an appropriate degree of safety, so adapting positively to sea level rise”.</p> <p>The Council’s support for “avoid” is on the condition that the core strategy also makes it clear that:</p> <ol style="list-style-type: none"> <li>1. The strategic sequential approach has been applied as part of the core strategy, and this has established that development in flood zones 2 and 3 cannot be avoided.</li> <li>2. There are strong reasons relating to sustainable development and regeneration for delivering development in the central area of Southampton, including within flood zones 2 and 3.</li> <li>3. The local sequential approach (within flood zones 2 / 3, steering development to those areas least at risk) needs to be considered alongside other planning objectives. For example there may be circumstances where a site may not meet the local sequential approach but its redevelopment could still be acceptable where it delivers wider</li> </ol>

	<p>planning / regeneration benefits and measures can be put in place such that the flood risk is reduced to acceptable levels.</p> <p>To some extent some of these points are already addressed by the core strategy at paragraph 4.1.2 (3<sup>rd</sup> bullet point). To a large extent these points will be addressed provided the suggested changes are made, specifically at paragraphs 5.4.22 d and g.</p> <p>For clarity it is considered it would also be helpful to amend paragraph 4.1.2 slightly, to read:</p> <p>“Reducing the risk and impact of flooding and directing new housing development to low flood risk areas. However, where there are strong reasons to allocate sites and encourage development within medium and high flood risk zones, <u>avoidance may not be appropriate, and</u> mitigation measures will be required when a planning application is submitted...”</p>
8. Clarify the status of the rail gauge improvements to the port	Reported to the Inspector
9. Provide brief information on Pagham Harbour Nature Reserve	See 9. below
10. Provide additional information on the Lordswood Country Park proposal – what is envisaged, how will it be implemented and does the delay in the TVBC Core Strategy present a difficulty or delay?	See 10. below
11. Draft a brief vision section for local	Spatial description section proposed before 4.3.1 to:

<p>suburban areas (to go into Spatial Strategy). This will incorporate material from elsewhere in the Core Strategy but will not add any anything new.</p>	<ul style="list-style-type: none"> <li>• Show wards, centres and provide a description of the area</li> <li>• Flag up the future approach to these specific areas, key development sites and important other sites and facilities</li> </ul> <p>Maps 2 and 3 to be amended to include the boundary of each area</p>
<p><b>Day 2 Action</b></p>	
<p>1. Policy CS3 (Town, district centres etc). Provide alternate wording for the paragraph in the policy text dealing with the potential loss of community facilities. This should make clear that pubs are subject to a test of commercial viability, whilst other facilities remain subject to the broader test as currently stated in the policy.</p>	<p>Proposals that result in the loss of a community facility throughout the city will not be supported if it is viable for the commercial <i>(for public houses in particular)</i>, public or community sector to operate it....</p>
<p>2. Policy CS2 last para (non retail development adjacent to the Primary Shopping Area). Consider whether we wish to amend the wording in the light of the discussion.</p>	<p>Policy CS2 Suggested Change from the Council</p> <p>The Council wish to maintain their existing suggested changes to policy CS2 (as set out in CD73). These include reference to the sequential approach, and to the City Centre Action Plan providing further guidance on the phasing, layout and extent of expansion.</p> <p>In addition, following the discussion at the hearing, the Council wish to propose the following changes to the final two paragraphs of policy CS2:</p> <p><del>Subject to ongoing monitoring, it is likely that an expansion of the primary shopping area in the major development quarter will be needed before 2026 to meet the retail needs set out in policy CS1.</del></p> <p><b>Subject to ongoing monitoring the need for retail expansion into the MDQ</b></p>

	<p><b>to meet the needs set out in policy CS1 is unlikely to occur before 2016 and is likely to arise in the period between 2016 and 2026.</b></p> <p><del>Non-retail</del> development adjacent to the existing primary shopping area within the major development quarter <b>may include a mix of uses but</b> will not be permitted if <del>this</del> it is likely to prejudice the provision of the required retail development <b>in that location.</b></p>
<b>Day 3 Action</b>	
<p>1. Policy CS5 (Housing Density) – new wording above the table agreed ... ‘Density levels to generally accord with:’ Also make clear (in the supporting text 4.5.24) that the PTAL will be updated as appropriate.</p>	<p>New wording above the table agreed ... ‘Density levels to generally accord with:’</p> <p>Also suggested that the policy should refer to net density so suggest the proposed wording above be amended to read: ‘Net density levels to generally accord with:’</p> <p>Add a new sentence to the end of the supporting text in paragraph 4.5.24 to read: ‘The PTAL map will be updated as appropriate.’</p> <p>There should be a similar reference made in paragraph 5.3.10 to read: as mentioned in paragraph 4.5.24 this map will be updated as appropriate.’</p>
<p>2. Policy CS15 (Affordable Housing) – revise wording to make clear there is no intention of getting a greater contribution for the use of alternative sites or commuted payments. Can we clarify the meaning of ‘dispersed’ in point 1 of the hierarchy of provision? Need to clarify whether the application of the policy is to be based on the net or gross number of new units.</p>	<p>Minor amendment to wording of 2<sup>nd</sup> criteria on hierarchy of provision – delete ‘an enhanced affordable provision’ to read:</p> <p><i>“On an alternative site, where it would result in a more effective use of available resources, or would meet an identified housing need such as providing a better social mix and wider housing choice.”</i></p> <p>Minor amendment to wording of 1<sup>st</sup> criteria on hierarchy of provision to read:</p> <p><i>“On-site as part of the development, distributed across the development as much as is reasonable and practical, to create a balanced, sustainable community.”</i></p>



	With regard to the third point the policy states that it will be applied to the total number of housing units which are being proposed (and therefore would be based on gross figures).
<b>Day 5 Actions</b>	
Redraw the key diagram incorporating amendments in the schedule of suggested changes and considering how mixed use developments are shown and how housing figures are represented'.	To be submitted to the Inspector when completed (not needed before the end of the examination).