



Partnership for Urban South Hampshire

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SENT VIA EMAIL ONLY

Alan C Scott,
Department for Communities and Local Government
Zone 1/H6 Eland House
DCLG,
Eland House,
Bressenden Place,
SW1E 5DU

17 October 2011

Dear Mr Scott

Re: The Partnership for Urban South Hampshire (PUSH) Consultation response on the Draft National Planning Policy Framework

The Partnership for Urban South Hampshire, PUSH, is a group of ten local authorities that work together to promote the economic development of South Hampshire and seek to improve the quality of life and well-being for our residents. We are constituted as a Joint Committee and the boundaries of PUSH reflect the functional economic area of the sub-region rather than administrative boundaries. The South Hampshire sub-region therefore reflects a functional economic area anchored around the two cities of Portsmouth and Southampton and the M27 corridor. Geographically it sits within an area surrounded by sensitive environmental assets. The PUSH area also has economic linkages with its neighbouring areas, and also with the regional, national and global economy.

PUSH local authorities will be responding individually to this consultation setting out their own views and the response below is on behalf of PUSH in relation to *strategic* issues that affect the Partnership as a whole. They are largely focused on the policy issues of sustainable development, joint working, business and economic development and the need to include transition arrangements as Local Authorities consider the impact of the removal of large elements of planning policy as detailed in paragraph 38 of the consultation document.

Q 1 a and b Delivering sustainable development

PUSH broadly supports the concept of a presumption in favour of sustainable economic development and recognises that the planning system has a key role to play in promoting and supporting economic growth. We note that the framework includes a strong presumption in favour of sustainable development. However in relation to the consultation PUSH does not agree that the framework has the right approach to defining the presumption, and the ambiguity will result in generating more uncertainty to communities, developers and investors, thereby undermining the intention to provide the positive framework needed to support economic growth. The framework should define what is meant by sustainable development and it needs to take into account the need to prioritise housing needs alongside economic and social priorities, and also acknowledge broader considerations. It is noted that within the framework there is a reference to heritage, sport and recreation, but not culture, and therefore the NPPF should acknowledge that cultural provision is also an important component of a sustainable community. This is particularly important in the PUSH area as we have set out a vision for the future which includes a higher level of employment in the sub-region and greater levels of participation among our workforce so that the benefits of growth are open to our residents. This is a vision of a more sustainable economic future that utilises the assets we already have in the sub-region and in order to deliver this, our strategy is centred on sustainable development and on ensuring that the quality of life which we value so highly is enhanced and enriched

Q 2 a and c Plan-making and joint working

PUSH notes the intention to introduce a duty to cooperate and notes that this duty will be a key element of proposals for strategic working once Regional Strategies are abolished. PUSH is a highly successful local Authority led partnership that was established in 2003. In developing the strategy for the PUSH area in 2004, the ambition of the partnership was to define a sustainable growth strategy for the sub-region, built upon enhanced economic performance. Key objectives of the strategy were to tackle identified pockets of deprivation and offer a better quality of life for everyone who lives, works and spends their leisure time in the area. Since then the partnership has continued to collaborate on establishing a robust evidence base, which is critical to understanding the needs of the area, including:

- The development and adoption of a new Economic Development Strategy in 2010 for the area.
- The annual preparation of a strategic housing market assessment
- In partnership with the HCA, the preparation of a Local Investment Plan (this is due to be refreshed in early 2012)
- The preparation of a revised spatial strategy for the PUSH area, to take account of the refreshed Economic Development Strategy, the emerging Government policy and work undertaken on LDF Core strategies. This is due to complete in summer 2012

PUSH welcomes the inclusion of a strong Duty to Co-operate within the NPPF (paragraphs 44 to 47) and is confident that authorities within PUSH will be able to satisfy this requirement through our ongoing arrangements for joint working.

Q 5 a to c and 6 a Business and Economic Development

PUSH broadly supports the 'planning for business' policies and the concept that seeks to encourage economic activity and give business the certainty and confidence to invest. Therefore the emphasis on enabling sustainable economic growth is welcome and is closely aligned to the purpose and vision of the PUSH partnership. However PUSH does not support paragraph 75 of the draft NPPF which proposes that planning policies should avoid the long term protection of employment land. PUSH recognises the need to support the cities within our sub-region to fulfil their potential as engines for economic growth in area. Our cities accommodate almost half of all jobs in the sub-region and deliver high levels of GVA per worker. They have the potential to become much stronger economic powerhouses, building on the presence of key assets including universities and international gateways. However, whilst our cities perform strongly in terms of the value of economic output they generate, over recent years they have experienced employment decline. There are also substantial pockets of deprivation with working age residents disengaged from the labour market. We must therefore support the regeneration and renaissance of our cities in order that we capture the potential they offer for the whole sub-region, as attractors of people, skills, investment and jobs.

Therefore it is necessary to protect employment land for a considerable period of time in order to provide business with the secure land supply that it requires for sustained growth. Other uses can often outbid employment, so it is an important function of the planning system to protect strategically important sites for employment and business uses – perhaps for many years in advance of their delivery. Examples include: waterfront sites for marine industry, sites requiring deep water access, large sites in key strategic locations for the logistics industry, large employment sites where phased clustering of spin-off and related industries are locating, or prime office locations adjacent to transport hubs. As written, the policy will make it possible for housing developers and others to challenge virtually any employment designation in a Local Plan. Para 75 should be replaced with a more restricted test of viability and deliverability for the employment site in question.

PUSH also notes the key objective of promoting the vitality and viability of town centres and this is strongly supported. However, the removal of commercial/office development from the list of town centre uses is in our view a critical omission which needs to be reviewed. This is a fundamental weakening of town centre policy which will lead to an expansion of less sustainable commercial development in locations which are only really suitable for car-borne staff. Locally, the changes are likely to lead to more applications for business parks on the M27 and will undermine the PUSH strategy to attract commercial development to suitable sites in the city centres and older urban areas. It is fully acknowledged that it will also be necessary to develop business parks in other locations (and new town centres in some cases), but the retention of the sequential test is vital to ensure that central area redevelopment sites are not treated as locations of last resort.

Within our sub-region there are proposals for major redevelopment projects in both Portsmouth and Southampton city centres as well as a range of other development sites which have the opportunity to accommodate employment and housing development. Investment is also required in transport infrastructure. A major factor in the relatively strong employment growth outside the cities has been that locations along the M27 are more easily accessed by car than city centre locations. However going forward we will support the redevelopment and regeneration of the cities of Portsmouth and Southampton in order to facilitate the development of the business services, retail and creative industries sectors in a sustainable manner and maximise the use of brownfield land in achieving our ambitions.

As a result PUSH contends that this change to town centre policy is in direct conflict with the requirement within the draft NPPF that "planning policies and decisions should actively manage patterns of growth to make the fullest use of public transport, walking and cycling and focus development in locations which are or can be made sustainable". Offices are large scale generators of transport movements and are best placed in city and town centres, where practicable, because that is where they can take advantage of public transport hubs and networks.

Other considerations

PUSH notes that the NPPF is a radical streamlining of existing Planning Policy Statements, Planning Policy Guidance notes and circulars to form a single consolidated document. Whilst we are supportive of decentralisation and the move to empower local communities, it is recognised that many existing local development plans and core strategies make reference to or rely upon parts of national planning policy for the expression of local policy intent. The deletion and streamlining of existing Planning Policy Statements, Planning Policy Guidance notes etc. (as detailed in paragraph 38 of the consultation document), will create a policy vacuum and gaps will appear in many local plans and will leave local communities vulnerable. Therefore it is critical that this is recognised and that a transition timetable is introduced to allow Local Authorities to respond to the introduction and full implementation of the NPPF, and to ensure that their Local Plan and early-adopter Core Strategies can be updated and more importantly reflect local choice, remain deliverable and be in conformity with the NPPF when it is implemented.

Yours Sincerely

Councillor Seán Woodward
Chairman of the Partnership for Urban South Hampshire